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SUBJECT: Forwards addl info re post-accident sampling sys,Normal plant sampling sys capable of being utilized under accident conditions that result in up to & including 1% failed fuel & meets requirements of NUREG-0737,Item II.B.3.

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September 15, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, Branch Chief
Licensing Branch No. 3
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station
Unit 2

By letter dated September 11, 1982 Southern California Edison Company(SCE) requested NRC approval of Proposed Change NPF-10-42 to Facility Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2. Proposed Change NPF-10-42 changes the implementation date of the Post Accident Sampling System from "prior to exceeding five (5) percent power" to January 1, 1983. By letter dated September 14, 1982 supplemental information was provided to the NRC. The purpose of this letter is to supplement the information provided by the previous letters.

The normal nuclear plant sampling system is capable of being utilized under accident conditions that result in up to and including 1% failed fuel. This capability meets all of the requirements of NUREG-0737, Item II.B.3 - "Post Accident Sampling Capability". In particular, sampling and analysis can be completed to meet the 3-hour time requirement while limiting personnel radiation exposure consistent with Item II.B.3. For reference, FSAR Section 12.2.1.5 discusses normal plant sampling system capabilities associated with 1% failed fuel.

Proposed Change NPF-10-42 indicates that post-accident sampling equipment developed since TMI could be contracted for and utilized if the need arose. During the interim period, prior to declaring the PASS operational, capability exists to obtain grab samples for RCS gaseous and liquid analysis and containment sump analysis. Containment atmospheric samples can be obtained utilizing either the normal sampling system or Radiation Monitor 2RE-7804-1 as long as a significant percentage of failed fuel has not occurred. In addition, station procedures are available for transporting and shipping those samples to an offsite facility for analyses. A contract has been awarded to Torrey Pines Technology, a division of General Atomics to provide such hot cell and radiochemistry facilities.

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The contract to Torrey Pines has only recently been let and Torrey Pines is in the process of readying their facilities and preparing necessary procedures for receiving and processing samples from San Onofre. It is expected that Torrey Pines facility and procedures will be ready in about one(1) month. At that time, Torrey Pines will be capable of analyzing samples in a timely manner, but not necessarily within the 3-hour time limit required by NUREG-0737, Item II.B.3.

Extending the implementation date of the PASS from "prior to exceeding five (5) percent power" to January 1, 1983 does not compromise the Company's capabilities to perform all of the necessary radiological assessing and monitoring in the plume EPZ in the event of an emergency. The source term used in radiological assessments can be conservatively derived using the high range in-containment monitors as discussed in Enclosure 1, Item I.B to letter dated September 14, 1982.

As stated in previous letters, approval of Proposed Change NPF-10-42 is needed urgently. If you have any questions concerning the enclosed information, please contact me.

Very truly yours,

K P Baskin

cc: H. Rood, To be opened by addressee only