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September 1, 1983

Director, Office of Nuclear Reactor Regulation
Attention: D. M. Crutchfield, Chief
Operating Reactors Branch No. 5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
NUREG-0737, Item II.B.1 - Reactor Coolant System Vents
San Onofre Nuclear Generating Station
Unit 1

- References:
1. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Post-TMI Requirements, NUREG-0737 Documentation Requirements, April 1, 1982
 2. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, NUREG-0737, Item II.B.1 - Reactor Coolant System Vents, Response to Request for Additional Information, June 1, 1982
 3. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, NUREG-0737, Item II.B.1 - Reactor Coolant Systems Vents, April 30, 1982
 4. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Upgraded SRO and RO Training, June 29, 1982

References 1 and 2 provided you with design information regarding the San Onofre Unit 1 Reactor Coolant Gas Vent System. The procedure enclosed with Reference 3 was a draft of the San Onofre Unit 1 Operating Instruction S01-4-33, "Reactor Coolant Venting System Operation." It is the purpose of this correspondence to provide you with the current status of this post-TMI requirement at San Onofre Unit 1.

Subsequent to the transmittal of the system operating procedure, the procedure has been revised and accordingly, the revised procedure is submitted as an enclosure to this letter. This procedure details how the system will be operated to mitigate the consequences of an accident. As previously described in Reference 3 this procedure defines the minimum conditions necessary to allow venting, the calculations necessary to determine the void volume, and provides the criteria to terminate venting.

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Reference 3 informed you that procedural instructions to specify "when" to use the reactor coolant vent system would be addressed as part of the Westinghouse Owner's Group (WOG) generic guidelines. To date the WOG generic guidelines have not addressed exactly when the operator should enter the venting procedure. Due to the accident specific nature of the information necessary, the need to consider the plant conditions and responses during the accident, and the event oriented nature of the WOG generic guidelines, it is not anticipated that the WOG will put any such instruction in the generic guidelines. Additionally, it is not appropriate to vent the reactor coolant system unless the voiding condition is interfering with core cooling or some other essential accident mitigating function. Therefore, it is not appropriate to put an instruction in our Emergency Operating Instructions (EOI's) specifically stating that the vent system should now be operated. We will instead rely on operator training to determine the accident conditions that will determine "when" the reactor coolant gas vent system will be used. The prerequisites in S01-4-33 combined with the training to recognize voiding conditions contained in our upgraded SRO and RO Training Program, provided in Reference 4 and required as our response to IE Bulletin 79-06A, provide assurance that the operations personnel are capable of recognizing voiding in the reactor coolant system and mitigating the consequences. Any decision to use the reactor coolant gas vent system under actual accident conditions would be made by the Emergency Coordinator and with the advisement of the technical staff available to him. This role is filled initially by the on duty Shift Supervisor until relieved by the Station Manager or his designated alternate.

The reactor coolant gas vent system was completed during the current outage and subsequently inspected by D. Kirsch of the NRC Region V staff on April 25-27, 1983. This system will not be utilized for accident mitigation purposes until receipt of your formal approval. The system will be included in our IST and ISI programs prior to Unit 1 restart. This system will be used for fill and vent operations in Modes 5 and 6 only. Based upon our evaluation the use of the reactor coolant gas vent system for this purpose does not constitute an unreviewed safety question under the criteria of 10 CFR 50.59.

In response to a telephone inquiry by members of your staff, the following information is offered:

Question: What does Seismic Category A mean and what edition of the code was used?

- o As defined in Enclosure 2 to Reference 1 the system is designed to be Seismic Category I and to ANSI B31.1, 1977 Edition.

Question: What are the ISI and IST requirements for the system?

- o Based on our review of the inservice inspection (ISI) requirements detailed in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components"; USNRC Standard Review Plan, NUREG-75/087, Section 5.2.4, "Reactor Coolant Pressure Boundary Inservice Inspection and Testing"; and 10 CFR 50, we have made the following determinations:

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- 1) Those portions of the RCGVS between the reactor and valves SV-2402/SV-3402, and the Pressurizer and valves SV-2404/SV-3404 are ASME Class 2. This determination has been made on the basis of a small-break analysis as allowed by footnote 2 of 10 CFR 50.22a, which allows downgrading of lines attached to the Reactor Coolant Boundary whose failure can be overcome by normal makeup. All other portions are non-safety related, and thus exempt from inspection.
- 2) As the piping is all 3/4", it is exempt from volumetric examination by paragraph IWC-1220(e) of ASME, Section XI. The only examination requirements applicable to these components are a visual test for leakage at operating temperature and pressure prior to return to power, and a hydrostatic test of the line(s) by the completion of the 10-year inspection interval.
- 3) The valves associated with the RCGVS are currently listed in San Onofre Unit 1 procedure S01-V-2.15, Revision 4, "Inservice Testing of Valves," as Class 2 valves, which are expected to be submitted and approved prior to Unit 1 restart.

NRC Generic Letter 82-16, NUREG-0737 provided us with post-TMI model technical specifications, but did not address the reactor coolant gas vent system. The "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," NUREG-0452 do not specifically address the reactor coolant gas vent system and until such time as the model technical specifications are issued, San Onofre Unit 1 Technical Specification 3.1.4, LEAKAGE provides assurance that the integrity of the primary coolant system is maintained.

Based upon the previous discussion we will use the reactor coolant gas vent system for startup/shutdown fill and vent operations, include it in the IST and ISI programs, and train our operations personnel in both the normal and post-accident use of the system. We reiterate the fact that the actual post-accident use of the reactor coolant gas vent system is conditional upon receipt of your approval.

If you have any additional questions regarding this system, please let me know.

Very truly yours,



R. W. Krieger
Supervising Engineer
San Onofre Unit 1 Licensing

Enclosure