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November 7, 1983

Director 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
SEP Topic V-10.A
Residual Heat Removal System Heat Exchanger Tube Failures
San Onofre Nuclear Generating Station
Unit 1

By letter dated January 5, 1979 the NRC transmitted their draft evaluation for SEP Topic V-10.A Residual Heat Removal Heat Exchanger Tube Failures. The evaluation identified the following open items:

1. The NRC staff indicates in the evaluation that additional assurance of leak detection for leakage from the Component Cooling Water System into the primary system is typically provided by the inclusion of limits and sampling frequencies in the plant Technical Specifications. San Onofre Unit 1 operating procedures adequately cover primary system sampling but there is no related technical specification. It is the NRC staff's opinion that such specifications for the primary system, during power operation and while shutdown, should be made a part of the license.

2. The procedure for sampling of the Component Cooling Water system should be expanded to include sampling when shutdown and should also include chloride samples.

3. Installation of a radiation detector should be considered on the discharge of the Saltwater Cooling system. The staff indicated this may be satisfied if the Component Cooling Water radiation detector was included in the unit Technical Specifications.

We responded to the draft evaluation by letter dated March 5, 1979. We commented that including a radiation detector on the saltwater cooling system was unnecessary since multiple failures were required for the leakage of radioactive material to the environment. Your letter of January 7, 1980 indicated that the final decision on the radiation monitor would be made during the integrated assessment.

In subsequent review of this topic we have developed additional information which should be considered as part of the integrated assessment. As indicated in the original draft evaluation, San Onofre Unit 1 has an extensive sampling and chemistry control procedure for the primary system. SO123-III-1.1.1, Unit 1 Primary Plant Chemistry Control. The sampling of the Component Cooling Water system is included in the procedure. The procedure

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applies during all modes of plant operation (i.e., operation and shutdown) for the Component Cooling Water System. The procedure includes a monthly sampling frequency of the Component Cooling Water for chlorides. This resolves the NRC's open item regarding the sampling of the CCW system.

The Component Cooling Water radiation monitor is included as part of the Radiological Effluent Technical Specifications (RETS). The specification requires that the monitor be channel checked, source checked, calibrated and tested. The RETS have been reviewed by the NRC and are currently in the process of being resubmitted to the NRC. Inclusion of this monitor in the technical specifications resolves the need to include a radiation monitor on the saltwater cooling discharge.

The remaining open item is the need to include a specification in the San Onofre Unit 1 Technical Specifications for sampling of the primary system. As indicated in your January 7, 1980 letter, this will be addressed in the integrated assessment.

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

Very truly yours,

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