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July 9, 1984

Director, Office of Nuclear Reactor Regulation
Attention: Mr. 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.F.1.4-Containment Pressure Monitor
San Onofre Nuclear Generating Station
Unit 1

Reference: Letter, D. M. Crutchfield, NRC, to K. P. Baskin, SCE, NUREG-0737 Items II.F.1.4, Containment Pressure Monitor, II.F.1.5, Containment Water Level Monitor and II.F.1.6, Containment Hydrogen Monitor, April 16, 1984

The referenced letter provided the Safety Evaluation (SE) for TMI Action Items II.F.1.4, 5 and 6. The only open item noted in the SE regarding our compliance with the design requirements concerned the present method of recording the containment pressure parameter. The current method of recording utilizes the Technical Support Center (TSC) computer to record instantaneous data once-per-minute. The NRC staff review indicated a concern that the post-accident pressure spikes will not adequately be recorded due to the very short duration of hydrogen burn induced pressure transients (approximately 1 second) in comparison to the relatively long time over which the data is sampled (once-per-minute). The following information is provided regarding the plan to modify the containment wide range pressure monitor recording capability at San Onofre Unit 1.

A software modification to the TSC computer will allow the collection of post-accident containment pressure data on a once-per-second basis. Every minute the TSC computer will sample the once-per-second data and record the highest of the 60 data points during that minute. The remainder of the information will not be retained. This method of recording will assure that the peak pressure of the transient will be adequately recorded and is an equivalent alternative to continuous monitoring for this application.

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In the case of the limiting design basis pressure transient, shown in Enclosure 1, the modified method of recording is adequate for recording the containment pressure transient. The initial pressurization to the initial peak is sustained for sufficient duration that the peak pressure will be correctly recorded. The remainder of the transient is of such a slow nature in comparison to the sampling time that adequate recording is assured. For the case of the peak pressure seen due to an in-containment hydrogen explosion, the once-per-second sampling frequency is adequate for the recording of the peak containment pressure seen during the transient. Although the rapid depressurization that follows may not be recorded, the lack of ability to completely record the hydrogen burn induced containment pressure transient is not a safety concern because the information of primary importance is not the rate of containment depressurization after the transient, but the peak containment pressure during the transient. Therefore, the loss of recorded information pertaining to the depressurization will not result in any operator misaction. The post-accident recording of the containment pressure is useful for operator reference to the peak pressure during the transient and post-shutdown review of the transient. Therefore, as detailed above, the modified method of post-accident containment pressure recording at San Onofre Unit 1 is adequate and no further modifications are planned.

If you have any additional questions regarding the above discussed information, please let me know.

Very truly yours,

M O Medford

Enclosure