UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 90 TO PROVISIONAL OPERATING LICENSE NO. DPR-13

SOUTHERN CALIFORNIA EDISON COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 1

DOCKET NO. 50-206

## 1.0 INTRODUCTION

By letter dated December 13, 1984, as supplemented January 16, 1985, and revised April 10, 1985, Southern California Edison Company (the licensee) proposed changes to the Technical Specifications (TS) for San Onofre Nuclear Generating Station, Unit No. 1. These changes would (1) modify portions of the Radiological Effluent Technical Specifications (RETS) that were issued by Amendment 79 to the license, (2) update Section 5.8 of the environmental TS and redesignate this section as Section 6.19 of the Appendix A TS, and (3) delete the remaining portion of the Appendix B Environmental TS.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on May 21, 1985 (50 FR 20990). No comments or requests for hearing were received.

## 2.0 DISCUSSION

The RETS issued by Amendment No. 79 to the license became effective as of January 1, 1985. The licensee has identified corrections that reflect as-built field conditions for the liquid and gaseous effluent monitors and design changes that have been implemented since the RETS submittals of December 12, 1983 and March 20, 1984. The corrections also modify channel test requirements to assure compliance to the RETS, clarify sampling and special reporting requirements and other minor clarifications.

In the RETS issued by Amendment No. 79, footnotes on certain tables for monitors R-2100, R-2101, and R-1254 indicate "New instrumentation - conformance with Technical Specifications will have to be determined following installation." These monitors have now been installed and are operable, although certain alarm functions for these instruments are not planned to be installed in the control room until the next refueling outage. Modifications to the footnotes are proposed to reflect the current status of the new monitors. Other proposed modifications to the RETS would (1) change the auto-termination function of release from the waste gas holdup system

from gross activity monitor R-1214 to noble gas monitor R-1219, (2) delete the channel test footnote (1) from monitor R-1214 on Table 4.1.3.1 because this monitor does not perform an isolation function, (3) revise the surveillance frequency for R-1214 to be consistent with the surveillance frequency required for other stack monitoring instruments, (4) add monitor R-1254 to Section 1.d of Tables 3.5.9.1 and 4.1.3.1 because this monitor has a particulate sampler filter, (5) modify the interval for flow estimation (if the stack fan flow indicator or the sampler flow rate measuring device are inoperable) from once per 4 hours to at least once per 8 hours in Action 24 of Table 3.5.9.1 on the basis that system design characteristics can be used to estimate flow and that these characteristics are not subject to rapid change, (6) correct the provision for most of the RETS Action Statements that now indicate that Specification 3.0 is not applicable to indicate that Specifications 3.0.3 and 3.0.4 are not applicable, (7) correct the provisions in the Action Statements of Specifications 3.18.3 and 3.19 regarding the applicability of the special reporting requirement of Specification 6.9.2.b(2), (8) include the combination of the noble gas activity monitor, R-1219, the particulate sampling filter, R-1220, and the iodine sampler cartridge, R-1221, for monitoring gross activity in Table 3.5.9.1, and (9) incorporate other minor footnote corrections to add a missing footnote reference and delete another which is not applicable.

Amendment No. 79, in addition to adding the RETS to the Appendix A TS, also deleted the then existing Radiological Environmental TS from Appendix B. With the redesignation of Section 5.8 of the Appendix B TS, discussed above, all that remains of Appendix B are definitions and administrative controls for TS that have been deleted. Because the definitions are no longer applicable and the administrative controls are duplicated in the Appendix A TS, the licensee has requested that Appendix B be deleted in its entirety. References to Appendix B would also be deleted consistent with the deletion of Appendix B.

## 3.0 EVALUATION

### 3.1 Modification to the RETS

The proposed changes to the RETS for San Onofre Unit No. 1 have been reviewed, evaluated, and found to be in compliance with the requirements of the NRC regulations and with the intent of the staff's model RETS for pressurized water reactors, NUREG-0472, Revision 2, February 1, 1980. In connection with the issuance of Amendment No. 79, the staff's evaluation and determination of acceptability were based on a Technical Evaluation Report (TER) prepared by its consultant, EG&G, Idaho, Inc. EGG-PBS-6569, March 1984. The changes to be authorized by the current amendment are consistent with the foregoing TER and staff evaluation and thus are acceptable.

### 3.2 Redesignation of Updated Section 5.8 of the Appendix B TS and Deletion of the Remaining Portion of the Appendix B TS

The proposed updating of Section 5.8 of the Appendix B TS and redesignation of the revised section as Section 6.19 of Appendix A, have been reviewed. The descriptive updating of the section on heat treatment used for incrustation control clarifies that normally only the intake conduit is treated. In addition, the description of the temperature of the water

has been updated to reflect the temperature of the water in the conduit rather than the temperature of the water as it is discharged from the condenser. This is a descriptive change only and has no environmental implication because the thermal discharge is regulated through the licensee's National Pollution Discharge Elimination System (NPDES) permit. During the staff's review of this updated section, it was noted that the licensee had inadvertently omitted the description of the estimated length of time that reversed flow is maintained in the conduit and the frequency at which the heat treatment is employed for incrustation control. The staff discussed this inadvertent omission with the licensee and it was mutually agreed to add this description to the proposed TS. These changes are descriptive in nature and have no safety or environmental significance; therefore, they are acceptable.

Two sentences in the section on land management were deleted because the information was no longer accurate, due in part, to the construction of San Onofre Units 2 and 3. This change has no safety or environmental impact.

The redesignation of Section 5.8 of the Appendix B TS as Section 6.19 of Appendix A is an administrative change that has no safety or environmental significance; therefore, it is acceptable. Section 6.9.3.g has been added to reference the special reporting requirements in new Section 6.19. This is an administrative change made in conjunction with the addition of Section 6.19 to the Appendix A TS. This change has no significant environmental or safety impact; therefore, it is acceptable.

With the redesignation of Section 5.8 of the Appendix B TS, discussed above, all that remains in Appendix B are definitions and administrative controls for TS that have been deleted. The RETS were added to Appendix A by Amendment 79 to the license. This amendment also deleted the RETS in Appendix B. Because the administrative controls are duplicated in Appendix A and the definitions are no longer applicable, the staff finds that the deletion of the Appendix B TS would have no environmental or safety impact. Therefore, the staff concludes that the deletion is acceptable. Consistent with this deletion, the modification of Paragraph 3.B of the license to delete the reference to Appendix B is also acceptable because it is a strictly administrative change with no safety or environmental impact. Similarly, the deletion of the parenthetical references to Appendices A and B in TS 6.5.2.1 is acceptable because with the deletion of the Appendix B TS, only Appendix A TS remain. This change is also administrative and has no safety or environmental impact.

## 4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves changes to requirements with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements as well as changes to reporting and administrative procedures. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant

increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

## 5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

## 6.0 ACKNOWLEDGEMENT

This Safety Evaluation has been prepared by W. Meinke and W. Paulson.

Dated: August 5, 1985