



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. TO PROVISIONAL OPERATING LICENSE NO. DPR-13

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 1

DOCKET NO. 50-206

1.0 INTRODUCTION

By letter dated May 27, 1987, Southern California Edison Company (SCE or the licensee) requested a change to the Technical Specifications appended to Provisional Operating License No. DPR-13 for operation of San Onofre Nuclear Generating Station, Unit No. 1 in San Diego County, California.

2.0 DISCUSSION

In their letter dated May 27, 1987, Southern California Edison Company proposed changes to the San Onofre Nuclear Generating Station, Unit 1, Technical Specification (TS) to 1) include testing requirements of a planned modification, 2) revise the surveillance standards to more closely reflect system design, 3) revise the Technical Specifications to more closely follow the Standard Technical Specifications (STS) and the current regulatory guidance, and 4) allow for suspension of pressurizer relief valve block valve testing during periods when the block valve needs to be closed because of an inoperable relief valve.

The planned modification is the installation of Control Room Emergency Air Treatment System duct heaters. The proposed change to TS 4.11.B.(2) would explicitly provide the option of replacing the charcoal adsorbent with an adsorbent meeting the physical property requirements of Regulatory Guide (RG) 1.52 in lieu of obtaining a representative sample for testing. Also, the required conditions of the laboratory sample analysis test would be revised to be in accordance with ASTM D-3803, 1979. The proposed change to TS 4.11.A would require that, once per refueling cycle, the pressure drop across the combined HEPA filters and charcoal filters be demonstrated to be less than 1.8 inches of water. Also, the flow rate reference would be changed from less than or equal to the design flow rate to $\pm 10\%$ of the design flow rate. The proposed change to TS 4.11.C would require that the system be operated at least 10 hours every month with the heaters on. Finally, the basis for TS 4.11 would be revised to specifically define the

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physical property requirements necessary to maintain the required charcoal filter removal efficiencies. Other changes to the basis are proposed for consistency with the proposed changes and with the STS. Additionally, reference to the effectiveness of the specification is deleted since satisfactory field testing of the system was previously completed.

3.0 EVALUATION

In their submittal, the licensee included several items in the analysis of the effects on safety functions of the proposed Control Room Emergency Air Treatment System TS changes. Replacing the adsorbent with new adsorbent material which must meet the requirements of Table 5-1 of ANSI N509-1976 would maintain the intent of TS 4.11.B.(2). The use of the ASTM D-3803, 1979 test procedure will assure that the laboratory test, if performed, is performed at the design basis residence time and will verify the actual charcoal condition. SRP Section 6.5.1, "ESF Atmosphere Cleanup Systems," states that ANSI N509-1980 will be used as an acceptability criterion for laboratory testing of activated charcoal adsorbent. ANSI N509-1980, Table 5-1, refers to the ASTM D-3803 test method. An additional restriction imposed by the proposed TS change is the acceptance criterion for the filter(s) pressure drop test and modification of the fan flow rate specification. These changes will provide additional assurance of proper filter and fan performance. The proposed increased monthly system operation with the heaters on will serve to assure that the design adsorbency of the charcoal filters is maintained. The remaining format and wording changes are administrative in nature and do not affect the actions to be performed to confirm system operability.

Based on the review of the licensee's proposed revisions to the Control Room Emergency Air Treatment System technical specifications, the staff concludes that the changes meet the intent of the Standard Technical Specifications and the related criteria of SRP Section 6.5.1 for ensuring an operable system. The staff finds the proposed changes to be acceptable.

The proposed change regarding the pressurizer power-operated relief valve (PORV) is a clarification. The change would clarify that PORV block valve quarterly exercising should not be conducted if, when the exercising falls due, the block valve is closed because of an inoperable PORV. This would be consistent with the action statement for the PORV which states that if a PORV becomes inoperable its associated block valve must be maintained closed. This would preclude opening for any reason, including exercising. We find the proposed change acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact have been prepared and published (53 FR 36663) in the Federal Register on September 21, 1988. Accordingly, based upon the environmental assessment, the Commission has determined that the issuance of this amendment will not have a significant effect on the quality of the human environment.

5.0 CONCLUSION

We have 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,
(2) such activities will be conducted in compliance with the Commission's regulations and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: C. Nichols
C. Trammell

Dated: September 26, 1988



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