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 ENGELKEN, R.H. Region 5, San Francisco, Office of the Director

SUBJECT: Responds to IE Bulletin 80-03, "Loss of Charcoal from Std Type II, Two-Inch, Tray Adsorber Cells." No potential for loss of charcoal incidental to handling, storage or use exists in control room emergency air treatment sys.

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March 6, 1980

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region V  
Suite 202, Walnut Creek Plaza  
1990 North California Boulevard  
Walnut Creek, California 94596

Attention: Mr. R. H. Engelken, Director

Docket No. 50-206  
San Onofre Unit 1

Dear Sir:

IE Bulletin 80-03  
Loss of Charcoal From  
Standard Type II, 2 Inch,  
Tray Adsorber Cells

Reference is made to your correspondence of February 6, 1980 forwarding the subject IE Bulletin. Identified therein was a potential leakage problem in certain ventilation systems due to loss of charcoal from standard type II, 2 inch, tray adsorber cells.

Responses to individual items are listed below in the order given in the Bulletin:

- Item 1. "Determine if charcoal adsorber cells in use, or proposed for use, have the potential for a loss of charcoal incidental to handling, storage or use (as appropriate). Particular attention should be directed to examination of a) rivet spacing resulting in separation of screen and cell housing and b) adsorber cell or filter housing deformation causing loss of charcoal and/or channeling. Either of these items could result in a degraded filtration system incapable of performing its intended function. The preferred method of this determination is a visual inspection of the filter housing and adsorber cells as described in Section 5 of ANSI N510-1975. If this method is not feasible, state in the report required by Paragraph 4 how the determination was made."

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Response: The Control Room Emergency Air Treatment System at San Onofre Unit 1 is the only safety related equipment that employs a charcoal adsorber cell (Flanders type II). The cell is normally replaced on an annual basis, the most recent replacement being in September of 1979.

The unit replaced is still onsite and was visually inspected as indicative of the condition of the unit in service at end of life. The inspection showed no evidence of charcoal loss. The rivets securing the perforated screens to the cell housing were approximately 1-1/2 inches apart, and the screen showed no sagging away from the casing between rivets. There was a very slight sagging on the screen face; however, there was no light penetration through the cells. The method of inspection is consistent with that described in Section 5 of ANSI N510-1975.

We have concluded from this inspection that there is no potential for loss of charcoal incidental to handling, storage or use.

Item 2. "For ESF filtration systems, any identified defective cells shall be replaced and the operability of the system (after cell replacement) demonstrated by leak testing within 7 days. Preferred method of leak testing is as described in Regulatory Guide 1.52 and Section 12 of ANSI N510-1975."

Response: This item does not apply to San Onofre Unit 1.

Item 3. "For normal ventilation exhaust filtration systems which employ charcoal adsorber cells and for which radioactive removal efficiency has been assumed in determining compliance with the "as low as reasonably achievable" design criteria of 10 CFR 50, Appendix I, any identified defective cells shall be replaced as soon as possible but at least within 30 days. After replacement, the system should be demonstrated operable by leak testing within an additional 30 days. Preferred method of testing is as described in Regulatory Guide 1.140 and Section 12 of ANSI N510-1975."

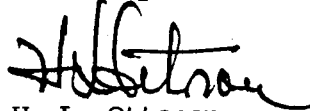
Response: San Onofre Unit 1 does not employ charcoal adsorber cells on normal ventilation exhaust filtration systems for which credit has been taken in achieving compliance with "as low as reasonably achievable" criteria as specified in 10 CFR 50, Appendix I.

Item 4. "Report in writing within 45 days of the date of this Bulletin the results of the determination required by Paragraph 1. The report shall include the type of cells employed (manufacturer and cell design), system containing the cells, observed cell condition (degradation/sagging) and a discussion of visual inspection procedure and results.

Response: This letter constitutes our response to this item.

Should you have any further questions on this matter, please call me.

Sincerely,



H. L. Ottoson  
Manager, Nuclear Generation

cc: Director, Office of Inspection and Enforcement  
Division of Reactor Operations Inspection  
~~Director~~ Director, Office of Inspection and Enforcement  
Division of Fuel Facility and Materials Safety Inspection