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November 25, 1981



Director, Office 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
Post-TMI Requirements
NUREG-0737, Item II.F.1, Attachment 2
Sampling and Analysis of Plant Effluents
San Onofre Nuclear Generating Station
Unit 1

Reference: Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Response to
Order confirming commitments for TMI Related Requirements,
August 6, 1981

We are proceeding with the design and installation of a Stack Effluent Radiation Monitoring System in response to the guidance provided in NUREG-0578 and NUREG-0737. The clarification provided in NUREG-0737 required the capability to maintain isokinetic conditions with variations in stack or duct design flow velocity of $\pm 20\%$. Enclosure 1 to our August 6, 1981 response to your July 7, 1981 order confirming our commitments for TMI related requirements for the San Onofre Nuclear Generating Station, described our modifications to comply with the subject requirement.

The purpose of this letter is to advise you that the Stack Effluent Monitoring System described in our August 6, 1981 letter will not include the capability to sample at isokinetic conditions in the $\pm 20\%$ of stack design flow range. Our decision, not to include this capability, is based on the following:

- The San Onofre stack design flow rate is 40,000 SCFM. Strict adherence to the clarification presented in NUREG-0737 would require the ability to sample at stack flow rates of 32,000 to 48,000 SCFM. Since the rated discharge of the three air handling units feeding the vent stack is 20,000 SCFM, flows of 20,000, 40,000, and 60,000 SCFM would be expected. Only the case when two units are discharging to the vent stack is the flow within the recommended range. Although the mode of operation where three units are discharging to the stack would exceed the stack design flow, it

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would result in a flow rate of 150% of design flow. This is outside of the 120% sample limit recommended in NUREG-0737. Also, operation of all three air handling units to discharge directly to the stack is considered very unlikely and would be considered an unusual operating mode, since the normal mode is to use one unit for air makeup to the containment. In response to a concern that three units could in fact be operated, discharging to the plant stack, procedures will be implemented, prior to placing the stack effluent monitoring system into service, preventing this ventilation configuration when expected releases would exceed the monitoring capability of the stack effluent monitors.

In our August 6, 1981 response to your July 7, 1981 Order Confirming Commitments for TMI Related Requirements we identified difficulties in achieving the isokinetic conditions necessary for particulate sampling in the low radiation/high flow sample line. This is to inform you that redesign of nozzle configuration has resolved these problems and that the system will be capable of sampling airborne particulates at isokinetic conditions.

If you disagree with the previously stated position or have any questions, please let me know.

Very truly yours,

K P Beshin 