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March 3, 1993

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **Docket No. 50-206**
Operation and Surveillance of Control Room Emergency Air Treatment
System During Permanently Defueled Condition
San Onofre Nuclear Generating Station, Unit 1

Reference: Letter, R. M. Rosenblum (SCE) to Document Control Desk (NRC),
"Operation and Surveillance Requirements for Permanently Defueled
Condition for San Onofre Nuclear Generating Station, Unit 1,"
September 21, 1992.

This letter clarifies our plans concerning the operability and surveillance of the San Onofre, Unit 1 (SONGS 1) Control Room Emergency Air Treatment System (CREATS) during the permanently defueled condition. The referenced letter stated that, even though Technical Specification 3.12 requires CREATS to be operable only when the reactor is critical, the system will be maintained operable during the defueled condition. However, after further review of the defueled plant condition, we have determined it appropriate to discontinue operation and surveillance of the system's fresh air intake automatic closure function.

As discussed below, the automatic closure feature of the control room fresh air intake is not required during the defueled condition and, therefore, will not be maintained or surveilled. Specifically, the surveillance required by Technical Specification 4.11.E will no longer be performed. However, closure of the fresh air intake upon manual start of the CREATS fan will continue to be surveilled as part of the normal monthly surveillance required by Technical Specification 4.11.C.

Except for the following surveillance frequency clarification, all of the other requirements of Technical Specification 4.11 will remain in effect until the Permanently Defueled Technical Specifications (PDTs) are in place. Surveillance of the pressure drop across the HEPA filters and charcoal adsorbers that is required by Technical Specification 4.11.A to be performed at least once per refueling cycle, will be completed every 18 months (or as specified by the eventual PDTs).

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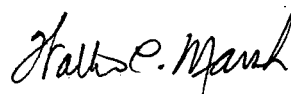
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The SONGS 1 CREATS is designed so that the fresh air intake damper closes automatically upon receipt of a containment isolation actuation signal. However, the need to maintain containment integrity is eliminated once the reactor has been defueled and all of the spent fuel has been stored in the spent fuel pool. Additionally, Technical Specifications 3.6.2 and 4.3.2 require containment automatic isolation capability only for Modes 1 through 4. Therefore, the containment isolation system and the CREATS fresh air intake auto-closure feature will not be maintained during the defueled condition. In accordance with the provisions of Technical Specification 4.0.3, surveillance of the CREATS air intake damper auto-closure capability will not be performed during the defueled condition since that CREATS function will be inoperable.

Please contact me if you have further questions on this matter.

Very truly yours,



cc: J. B. Martin, Regional Administrator, NRC Region V
S. W. Brown, NRC Project Manager, San Onofre Unit 1
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3
R. F. Dudley, Jr., Section Chief, Non-Power, Decommissioning, and
Environmental Project, Directorate of Reactor Projects - 3, 4 and 5

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SUBJECT: Clarifies plans re operability & surveillance of CR
emergency air treatment sys during permanently defueled
condition.Containment isolation sys & fresh air intake auto-
closure feature will not be maintained.

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