

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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SEE P. 81

SUBJECT: Forwards for review & approval "Procedural Guidelines for Reactor Coolant Gas Vent Sys" & Operating Instruction 5023-3-2.33 to satisfy requirements of TMI Action Item II.B.1 re RCS vents.

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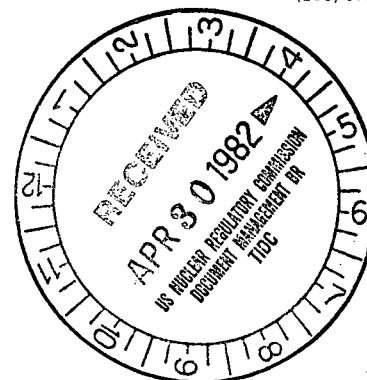
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April 27, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Item II.B.1, Reactor Coolant System Vents, of NUREG-0737 required SCE to install RCS vents that are remotely operated from the control room to vent noncondensable gases from the RCS which may inhibit core cooling during natural circulation. Item II.B.1 also indicated that operating procedures should not be implemented and valves should be placed in a condition so as to minimize the potential for inadvertent actuation until NRC staff approval is obtained. This requirement has also been identified as license condition (19)h of Operating License No. NPF-10 for San Onofre Unit 2, which indicates that SCE should provide to the NRC procedures or procedure guidelines for Reactor Coolant Gas Vent System (RCGVS) operation and testing by May 1, 1982.

Consistent with the above requirement enclosed for your review and approval are seven (7) copies of the following information (NRC Mail Code B028):

- ENCLOSURE I. Procedural Guidelines For Reactor Coolant Gas Vent System For Southern California Edison, San Onofre Nuclear Generating Station Units 2 and 3
- ENCLOSURE II. San Onofre Nuclear Generating Stations Units 2 and 3 Operating Instruction S023-3-2.33, Reactor Coolant Gas Vent System.

Enclosure I was prepared for San Onofre Units 2 and 3 by Combustion Engineering and was previously provided to the NRC by SCE letter dated February 13, 1981 which transmitted clarification for several NUREG-0737 items. Enclosure I served as a basis for preparation of the Enclosure II procedure.

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It should be noted that the requirements of NUREG-0737, Item II.B.1 address use of the RCGVS during emergency post accident conditions. Whereas, the RCGVS for San Onofre Units 2 and 3 was designed to be utilized for both (1) normal venting and filling operations (e.g., MODES 5 and 6) and (2) emergency post accident situations. The Enclosure II procedure indicates that the RCGVS is to be used for both normal and emergency post accident operation. Consistent with the NRC requirement for not using the RCGVS during emergency post accident situations without NRC staff approval of the procedure, the "Emergency RCGVS Operation" section of the Enclosure II procedure includes a caution statement prohibiting the operator from using the RCGVS unless approval is first obtained from the NRC.

The "Implementation" section of NUREG-0737, Item II.B.1 also requires that the valves be placed in a condition so as to minimize the potential for inadvertent actuation (e.g., remove power) until staff approval is obtained. Accordingly the procedure contains provisions for de-energizing the RCGVS valves when the system is not in use to preclude inadvertent actuation of the system (Check Off List No. 2 of Enclosure II). In order to operate the RCGVS the operator must first energize the valves by closing associated electrical disconnects (Check-Off List No. 1 of Enclosure II) and then, lift the protective cover and depress the actuation switch for each valve. SCE considers that these two positive actions, which must be performed before the RCGVS can be operated, ensure that the RCGVS will not be inadvertently actuated during normal or emergency post accident conditions. SCE plans to utilize the existing emergency protective measures and responses delineated in the Emergency Operating Instructions during emergency post accident conditions for San Onofre Units 2 and 3 before utilizing the RCGVS.

SCE considers that the enclosed information satisfies condition (19)h of Operating License No. NPF-10 for San Onofre Unit 2, Should the NRC require additional information SCE is available to meet with the staff in order to facilitate prompt approval of the RCGVS procedure.

If you have any questions or comments, please let me know.

Very truly yours,

am. d. Mreched
for KPB

Enclosure

ENCLOSURE I