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SUBJECT: Responds to Generic Ltr 82-16, "Clarification at TMI Action Plan Requirements." Comparison of Tech Specs for both units vs NUREG-0737 requirements encl.

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December 7, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, 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

The NRC's letter of September 20, 1982 (Generic Letter No. 82-16) requested all licensees of power reactors to provide information regarding NUREG-0737 "Clarification of TMI Action Plan Requirements" and those items for which Technical Specifications are required.

Consistent with the NRC's request, enclosed please find the comparison of San Onofre Units 2 and 3 Technical Specifications versus NUREG-0737 Requirements.

Very truly yours,

K P Baskin

Enclosure

cc: Mr. H. Rood, Project Manager
Licensing Branch No. 3

B001

NUREG-0737 TECHNICAL SPECIFICATIONS

(ITEMS SCHEDULED BY DECEMBER 31, 1981)

Requirement

(1) STA Training (I.A.1.1.3)

Our July 2, 1980 letter provided model TSs for TMI lessons learned Category "A" items. Included were TSs that specified the qualifications, training and on-duty requirements for the Shift Technical Advisors (STA). STA training requirements are under the consideration by the Commission. Further guidance will be provided pending the decision on the requirements by the Commission.

SO23 Position

Although STA training requirements are under consideration by the Commission, we are in full compliance with the July 2, 1980 letter as of the issuance of Technical Specification Amendment 4 for Unit 2 and final issuance for Unit 3 Technical Specifications. The Technical Specification for both plants which addresses this concern is 6.4.1.

Action Required

None

Requirement

(2) Limit Overtime (I.A.1.3)

On June 15, 1982 we transmitted to licensees of operating plants a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In the same letter we also transmitted revised pages of NUREG-0737 (Item I.A.1.3). The administrative section of the technical specifications should be revised to require procedures that follow the policy statement guidelines. An acceptable specification would be "the amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12)," or following the model TSs in Enclosure 2.

SO23 Position

Unit 3 has incorporated the overtime requirements as Technical Specification 6.2.2.f. Facility Operating License NPF-10 for Unit 2 does contain the limits imposed by the NRC Policy Statement on working hours prior to June 15, 1982. However, an amendment application to Unit 2 Technical Specifications will be submitted to the NRC by December 29, 1982 to incorporate the revised version of the Commission's Policy Statement on Staff working hours.

Action Required

By December 29, 1982 an amendment to incorporate overtime requirements as Technical Specification 6.2.2.f for Unit 2 will be formally submitted to the NRC.

Requirement

(3) Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)

The objective of this item is to improve the reliability and performance of the auxiliary feedwater (AFW) system. TSs depend on the results of the licensee's evaluation and the staff review, and are being developed separately for each plant. The limiting conditions of operation (LCO's) and surveillance requirements for the AFW system should be similar to other safety-related systems.

SO23 Position

An evaluation to improve the reliability and performance of the Auxiliary Feedwater System was completed in October 1981. This review addressed the concerns outlined in NUREG-0737 and the AFW system was found satisfactory.

Action Required

None

Requirement

(4) Safety Grade AFW System Initiation and Flow Indication (II.E.1.2)

The AFW system automatic initiation system was to have been control grade by June 1, 1980 and safety grade by July 1, 1981; the AFW system flow indication was to have been control grade by January 1, 1980 and safety grade by July 1, 1981. The control grade requirement was part of the short term lessons learned activities, and model TSs were included with our July 2, 1980 letter. These TSs are considered adequate as TSs for the safety grade requirement.

SO23 Position

AFW system automatic initiation for Unit 2 and Unit 3 as specified in Technical Specification 3/4.7.1.2 conforms with NRC Standard Technical Specifications prepared for CE plants, NUREG-0212 Revision 3.

AFW system flow indication for Unit 2 and Unit 3 as specified in Technical Specification 3.3.3.6 (Table 3.3-10) conforms with NRC Standard Technical Specifications prepared for CE plants, NUREG-0212 Revision 3.

Action Required

None

Requirement

(5) Dedicated Hydrogen Penetrations (II.E.4.1)

Plants that use external recombiners or purge systems for post-accident combustible gas control of the containment atmosphere should provide containment penetrations dedicated to that service. In satisfying this item, some plants may have to add some additional piping and valves. If so, these valves should be subjected to the requirements of Appendix J, and the TSs should be modified accordingly.

S023 Position

San Onofre Units 2 and 3 utilize recombiners inside of containment and thus this requirement is not applicable to S023.

Action Requried

None

Requirement

(6) Containment Pressure Setpoint (II.E.4.2.5)

The containment pressure setpoint that initiates containment isolation must be reduced to the minimum compatible with normal operating conditions. Most plants provided justification for not changing their setpoint and we approved their justification by separate correspondence. The remaining plants must submit a change to the TSs with the lower containment pressure setpoint and provide justification if this setpoint is more than 1 psi above maximum expected containment pressure during normal operation.

SO23 Position

An evaluation was performed and outlined in the San Onofre Units 2 and 3 Responses to NUREG-0737. The containment isolation actuation system setpoint is < 2.95 psig (per Technical Specification 3/4.3.2, Table 3.3-4) and is considered to be the minimum compatible with normal operation. No change was deemed necessary.

Action Required

None

Requirement

(7) Containment Purge Valve (II.E.4.2.6)

Model TSs are being sent separately to each plant as part of the overall containment purge review. These TSs include the requirement that the containment purge valves be locked closed except for safety-related activities, verified closed at least every 31 days, and be subjected to leakage rate limits.

S023 Position

These proposed specifications have been incorporated in Unit 2 and Unit 3 Technical Specification 3/4.6.1.7.

Action Required

None

Requirement

(8) Radiation Signal on Purge Valves (II.E.4.2.7)

The containment purge valves must close promptly to reduce the amount of radiation released outside containment following a release of radioactive materials to containment. TSs should include the requirement that at least one radiation monitor that automatically closes the purge valves upon sensing high radiation in the containment atmosphere be operable at all times except cold shutdowns and refueling outages. If not operable, either the plant should be proceeding to cold shutdown within 24 hours or the purge valves should be closed within 24 hours. Model TSs are provided in Enclosure 2 in Standard Technical Specifications format for those plants that are using safety grade components to satisfy the requirement.

SO23 Position

Unit 2 and Unit 3 Technical Specification 3/4.3.2 conforms with NRC Standard Technical Specifications prepared for CE plants, NUREG-0212, Revision 3.

Action Required

None

Requirement

(9) Upgrade B&W AFW System (II.K.2.8)

Acceptance criteria for proposed TSs are identical to that described in (2) and (3) above.

(10) Not utilized in the Generic letter.

(11) B&W Thermal-Mechanical Report (II.K.2.13)

Licensees of B&W operating reactors are requried to submit by January 1, 1981 an analysis of the thermal-mechanical conditions in the reactor vessel during recovery from small breaks with an extended loss of all feedwater. TSs, if required, will be determined following staff review.

SO23 Position

Items 9 and 11 are applicable to B&W plants only and therefore do not apply to San Onofre Units 2 and 3 which are CE plants. Note that Item 10 was not utilized in the generic letter.

Action Required

None

Requirement

(12) Reporting SV and RV Failures and Challenges (II.K.3.3)

NUREG-0660 stated that safety and relief valve failures be reported promptly and challenges be reported annually. The sections of your TSs that discuss reporting requirements should be accordingly changed; model TSs are given in Enclosure 2. Note that an acceptable alternative would be to report challenges monthly.

S023 Position

Unit 3 Technical Specification 6.9 has incorporated the NUREG-0737 Requirements for reporting SV and RV failures and challenges.

On December 1, 1982, an amendment to incorporate reporting requirements for SV and RV failures and challenges in the Unit 2 Technical Specification 6.9 was formally submitted to the NRC.

Action Required

None

Requirement

(13) Anticipatory Trip on Turbine Trip (II.K.3.12)

Licensees with Westinghouse-designed operating plants have confirmed that their plants have an anticipatory reactor trip upon turbine trip. Many of these plants already have this trip in their TSs. For those that do not, the anticipatory trip should be added to the TSs. Model TSs are included in Enclosure 2 in the format of Standard Technical Specifications.

SO23 Position

Item 13 applies to Westinghouse plants only and therefore do not apply to San Onofre Units 2 and 3 which are CE plants.

Action Required

None

HRP:6151