

February 12, 1992

Docket No. 50-206

Mr. Harold B. Ray
Senior Vice President
Southern California Edison Company
Irvine Operations Center
23 Parker Street
Irvine, California 92718

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Dear Mr. Ray:

SUBJECT: CHANGES TO THE BASES SECTION OF THE UNIT 1 TECHNICAL SPECIFICATIONS (TAC No. M82616)

By letters dated October 4, 1991, and December 4, 1991, you proposed changes to the bases of the San Onofre Unit 1 Technical Specifications. We have reviewed the proposed changes and agree that the changes are desirable, they are administrative in nature, and do not change the requirements of the specifications.

Proposed changes included in the October 4, 1991, letter consist of an addition to the basis section of Specification 4.1.9, "Auxiliary Feedwater System Surveillance." The addition summarizes several operationally significant auxiliary feed pump testing requirements. The basis additions are testing requirements that are included in the existing Unit 1 inservice testing (IST) program.

Proposed changes included in the December 4, 1991, letter consist of an addition of a paragraph to the basis section of Specification 4.12, "Miscellaneous Radioactive Materials Sources." The added paragraph clarifies requirements applicable to sealed sources that are enclosed within a shielded mechanism. The paragraph had been part of the Technical Specifications previously but was inadvertently deleted during the processing of Amendment Request No. 168.

We have changed the basis sections of Specifications 4.1.9 and 4.12 as requested. The enclosed are copies of pages 4.1-29 and 4.12-1 with the revisions incorporated.

Sincerely,
Original signed by George Kalman
George Kalman, Sr. Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

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NAME	DFoster <i>DFoster</i>	JBradfute <i>JBradfute</i>	GKalman <i>GKalman</i>	TQuay <i>TQuay</i>	
DATE	2/11/92	1/11/92	2/11/92	2/11/92	

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Sincerely,

A handwritten signature in cursive script that reads "George Kalman".

George Kalman, Sr. Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

Mr. Harold B. Ray
Southern California Edison Company

San Onofre Nuclear Generating
Station, Unit No. 1

cc:

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4.12 MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES

APPLICABILITY: Applies to the leakage of radioactive source materials.

OBJECTIVE: To verify the physical integrity of portable and fixed radioactive calibration sources.

SPECIFICATION: A. Byproduct material sealed sources which exceed the quantities listed in 10 CFR 30.71, Schedule B, and all other sealed sources containing greater than 0.1 microcuries shall be leak tested in accordance with Specification B, C and D below.

Exception: Notwithstanding the periodic leak test required by this specification, any licensed sealed source is exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.

B. Each sealed source containing radioactive material, other than Hydrogen 3, with a half life greater than thirty days and in any form other than gas, shall be tested for leakage and/or contamination prior to use out of storage and prior to transfer to another person and thereafter at intervals not to exceed six months. This test does not apply to sealed sources that are stored and not in use.

C. The leakage test shall be capable of detecting the presence of .005 microcuries of radioactive material. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate.

D. If testing reveals the presence of .005 microcuries or more of removable contamination, it shall immediately be withdrawn from use, decontaminated, and repaired, or disposed of in accordance with applicable regulatory requirements and reported in the subsequent annual report filed pursuant to Specification 6.9.1.4.

BASIS: This Specification assures that leakage from radioactive material sources does not exceed allowable total body or organ limits. In the unlikely event that those quantities of radioactive byproduct materials of interest to this Specification which are exempt from leakage testing are ingested or inhaled, they represent less than one maximum permissible body burden for total body irradiation. The limits for all other sources (including alpha emitters) are based upon 10 CFR 70.39 (c) limits for plutonium.

Sealed sources which are continuously enclosed within a shielded mechanism (i.e., sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

pressure above 500 psig. The flow tests shall be conducted with the auxiliary feedwater system valves in their emergency alignment. Within 72 hours after entering MODE 3, the steam driven auxiliary pump shall be similarly tested.

- E. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 for the steam driven auxiliary feedwater pump. However, the steam driven AFW pump must be OPERABLE in all other respects.

BASIS:

The OPERABILITY of the auxiliary feedwater system ensures that the Reactor Coolant System can be cooled down to less than 350°F from normal operating conditions in the event of a total loss of offsite power.

The design of the auxiliary feedwater system further ensures sufficient AFW flow into the intact feedwater lines without exceeding pump run-out or water hammer limits for any applicable design basis event with or without concurrent loss of offsite power and a single active failure.^(2,3)

Specification 4.1.9.A demonstrates the operability of the AFW pumps by testing requirements of the Seciton XI IST program.⁽⁴⁾ During normal power operation, pump G-10W is substantial flow tested and pumps G-10 and G-10S are tested on minimum flow. During this test differential pressure, pump speeds, and bearing vibration are measured for all 3 pumps. Pump discharge flow is measured for AFW pump G-10W. At each return from a MODE 3, 4, or 5 shutdown following power operations, pumps G-10 and G-10S are full flow tested unless tested in the previous 92 days. G-10S is tested prior to MODE 3. G-10 is tested in MODE 1 at about 20% power.

REFERENCES:

- (1) NRC letter dated July 2, 1980, from D. G. Eisenhut to all pressurized water reactor licensees.
- (2) SCE letter dated November 6, 1987, from M. O. Medford to NRC Document Control Desk.
- (3) SCE letter dated November 20, 1987, from M. O. Medford to NRC Document Control Desk.
- (4) SCE letter dated January 3, 1991, from F. R. Nandy to NRC Document Control Desk.