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RECIP.NAME RECIPIENT AFFILIATION
MIRAGLIA,F.J. Licensing Branch 3

SUBJECT: Requests mod to proposed Tech Specs 3/4.3.6.1.7 to increase time limit for operation w/purge supply &/or exhaust isolation valves open w/vacuum/pressure relief isolation valves open,up to 1,000-h.

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July 9, 1981

Mr. Frank J. Miraglia, Jr., Chief
Licensing Branch No. 3
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-275
Docket No. 50-323
Diablo Canyon Units 1 and 2

Dear Mr. Miraglia:

Subject: Technical Specification
Containment Ventilation System

Pacific Gas and Electric Company requests a modification to the Diablo Canyon Technical Specification section 3/4.3.6.1.7. This change would increase the time limit for operation with the purge supply and/or exhaust isolation valves open or with the vacuum/pressure relief isolation valves open from less than or equal to 90 hours per 365 days to less than or equal to 1000 hours per 365 days. We are proposing this change to provide a means of maintaining containment pressure within technical specification limits and to maintain activity levels within the containment atmosphere sufficiently low to permit personnel access for inspection and maintenance.

During normal plant operation, air leakage into containment from instrumentation and air-component operation will cause a gradual pressure buildup. Technical Specification 3/4.3.6.1.4 requires containment internal pressure to be maintained less than 0.3 psig. Therefore, normal plant evolution to decrease containment pressure is by the use of the containment excess pressure relief system. Our analysis has shown that this system (which includes the vacuum/pressure relief isolation valves) will be required to be in operation between 50 and 100 hours per year just to relieve pressure buildup previously noted. This time could be further increased if the present requirement (T. S. 3/4.3.6.1.7) to have the vacuum/pressure relief isolation valves "blocked to prevent opening beyond 50°" is maintained.

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Containment pressure buildup will also occur during a plant heatup or when there is a large drop in barometric pressure. There will be several occurrences of these events each year which will also contribute to the amount of time the containment excess pressure relief system will be required to be in operation.

Additionally, periodic containment entries are required during operation for routine inspections and safety-related maintenance. These entries will require containment purging to ensure as low as reasonably achievable exposure from airborne radioactivity to the personnel entering containment. The exact amount of time that the containment purge system will be required to operate each year to achieve this is unknown but indications are that it will be substantial.

Accordingly, we believe that the present 90 hour limitation on containment ventilation system operation is overly restrictive, considering:

1. The in-depth analysis performed on this system to satisfy the requirements of Branch Technical Position (8TP) CSB 6-4.

2. The information provided when this issue was previously addressed in "PGandE Response to U. S., NRC letter dated March 21, 1978, Question 6.45"

3. The arguments presented in this letter

For the foregoing reasons we believe a limit of 1000 hours for purge system operation is reasonable and justified at the present time. However, we recognize that, as operational experience is gained at Diablo Canyon, this time could require adjustment.

Very truly yours,

Richard F. Locke

for Philip A. Crane, Jr.

CC: Service List