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ATTORNEYS

June 26, 1980

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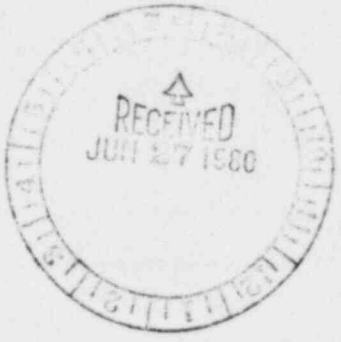
Region V
U. S. Nuclear Regulatory Commission
1990 N. California Boulevard
Walnut Creek Plaza, Suite 202
Walnut Creek, California 94596



Re: Docket No. 50-133
License No. DPR-7

Dear Mr. Engelken:

This is in response to your letter dated May 6, 1980, which enclosed IE Bulletin No. 80-10 concerning the possible contamination of non-radioactive systems.

The action statements of the Bulletin and our responses are given in Attachment A.

Very truly yours,

Philip A. Crane, Jr.

Attachment

CC w/attachment: Director
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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80-35

PACIFIC GAS AND ELECTRIC COMPANY
HUMBOLDT BAY POWER PLANT UNIT NO. 3
Docket No. 50-133
License No. DPR-7
ATTACHMENT A
RESPONSE TO IE BULLETIN NO. 80-10 DATED MAY 6, 1980

The subject Bulletin lists four actions to be taken by licensees with an operating license. These action statements are listed below with our response.

"1. Review your facility design and operation to identify systems that are considered as nonradioactive (or described as nonradioactive in the FSAR), but could possibly become radioactive through interfaces with radioactive systems, i.e., a nonradioactive system that could become contaminated due to leakage, valving errors or other operating conditions in radioactive systems. In particular, special consideration should be given to the following systems: auxiliary boiler system, demineralized water system, isolation condenser system, PWR secondary water clean-up system, instrument air system, and the sanitary waste system."

This review was performed and the following nonradioactive systems were identified as being capable of becoming contaminated through interfaces with radioactive systems: auxiliary boiler systems (i.e. Units 1 and 2), demineralized water system, isolation condenser system, instrument air system, sanitary waste system, domestic water system, closed cooling water system, salt (circulating) water system, and the turbine lube oil system.

"2. Establish a routine sampling/analysis or monitoring program for these systems in order to promptly identify any contaminating events which could lead to unmonitored, uncontrolled liquid or gaseous releases to the environment, including releases to on-site leaching fields or retention ponds."

All but two of the systems identified above are monitored by a routine program to promptly identify any contaminating events.

The two unmonitored systems are the instrument air and auxiliary boiler systems. Monitoring programs for these two systems are presently being developed and will be established by June 20, 1980.

"3. If these nonradioactive systems are or become contaminated, further use of the system shall be restricted until the cause of the contamination is identified and corrected and the system has been decontaminated. Decontamination should be performed as soon as possible. However, if it is considered necessary to continue operation of the system as contaminated, an immediate safety evaluation of the operation of the system as a radioactive system must be performed in accordance with the requirements of 10CFR50.59. The 10CFR50.59 safety evaluation must consider the level of contamination (i.e., concentration and

total curie inventory) and any potential releases (either routine or accident) of radioactivity to the environment. The relationship of such releases to the radioactive effluent limits of 10CFR20 and the facility's Technical Specification and to the environmental radiation dose limits of 40CFR190 must also be evaluated. The record of the safety evaluation must set forth the basis and criteria on which the determination was made."

"4. If it is determined in the 10CFR50.59 safety evaluation that operation of the system as a radioactive system is acceptable (i.e., does not involve an unreviewed safety question or a change to the Technical Specifications), provisions must be made to comply with the requirements of 10CFR20.201, General Design Criterion 64 to 10CFR50, Appendix I to 10CFR50 and the facility's Technical Specifications. In specific, any potential release points must be monitored and all releases must be controlled and maintained to "As Low As is Reasonably Achievable" levels as addressed in Appendix I to 10CFR50 and within the corresponding environmental dose limits of 40CFR190. However, if in the 10CFR50.59 determination it is determined that operation of the system as a radioactive system does constitute an unreviewed safety question or does require a change to the Technical Specifications, the system shall not be operated as contaminated without prior Commission approval."

A radiation control procedure has been prepared which incorporates the requirements of the above two action statements. This procedure will be reviewed and adopted as plant policy by June 20, 1980.