SAFETY EVALUATION
AMENDMENT 9 to NPF-10
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2
DOCKET NO. 50-361

Introduction

By letters dated September 11, 14, and 15, 1982, the licensees requested that the date for operability of the post-accident sampling system (PASS) and implementation of the post-accident sampling program be changed. The present operability date is "prior to exceeding five (5) percent power". The licensee proposes to change this date to "January 1, 1983". This would require a change in condition 2.C(19)i of the San Onofre 2 Operating License, NPF-10, and the associated Technical Specification, 6.8.4.d.

In their letter of September 11, 1982, the licensees stated that their request for relief is necessitated by a number of hardware problems that have recently been identified in the course of testing the PASS. These problems collectively prevent the licensees from declaring the PASS operable. Specifically, the licensees stated that these problems involve design and material lead time, fabrication and installation times that preclude their correction prior to exceeding the scheduled 5% power date. The licensees estimate that the problems can be satisfactorily resolved within about 3 1/2 months. Also, in their above-referenced letters, the licensees describe the potential capability that the PASS will provide and the alternate methods that will be available to perform each of the PASS functions prior to January 1, 1983. Our evaluation of the proposed change is given below.

Evaluation

In Supplement No. 1 to the SER (NUREG-0712), issued in February 1981, we stated that we found the San Onofre 2 and 3 post-accident sampling and analysis system to be acceptable because it met the NRC's post-TMI requirements. We further stated that the licensees had committed to install the system prior to operation of Unit 2 above 5% power, but not later than January 1, 1982. This commitment met the implementation date requirements of NUREG-0737, and was found to be acceptable on that basis.

In Supplement No. 4 to the SER, issued in January 1982, we granted the licensees relief from the January 1, 1982 date. On February 16, 1982, Operating License NPF-10 was issued with a condition requiring completion of the post-accident sampling system and implementation of the post-accident sampling program prior to exceeding five percent power.

In their letter of September 11, 1982 and in a meeting held on September 13, 1982 the licensees described the more serious problems that prevent them from

declaring the PASS operable. These include:

1. Undersized heat tracing of containment atmosphere sample line.

2. Unreliable oxygen monitor analysis results due to inability to vent back pressure from the analyser.

3. Inability to sample containment sump due to incorrectly sized orifice, and no alternate path to bypass the orifice.

The licensees stated that these are system problems, and therefore had not been detected during component testing. The system demonstration testing that revealed the problems was not started until about September 1, 1982, because this testing was previously precluded by the system alignments required for low power physics testing.

The staff has reviewed the licensees' proposed change to NPF-10 and the licensees' description of the partial capability of the PASS and alternate methods that are currently available for performing each of the PASS functions during the interim period. Based on this review, the staff concludes that the requested relief pertaining to the implementation date for operability of the PASS is acceptable for the following principal reasons:

1. The currently available normal sampling and analysis system has the capability to sample and analyze all the sources listed in Item II.B.3 of NUREG-0737 under accident conditions that result in up to and including 1 percent failed fuel. Specifically, this capability meets the 3-hour time requirement and the personnel radiation exposure limits stated in Item II.B.3.

2. The reactor coolant system (RCS) liquid sampling function of the PASS will be available during the interim period as much as is possible consistent with the need to take this function out of service to work on the remainder of the PASS functions. The RCS liquid sampling function of the PASS is expected to be available for about 75 percent of the time during the interim period.

3. The containment high radiation area monitor with a range up to 10^8 Rads/hour is currently available and can be used to estimate the extent of core damage for a spectrum of accidents including the design basis LOCA.

4. The currently available safety grade, containment hydrogen monitor is capable of monitoring and providing continuous readout of the hydrogen concentration in containment for concentrations from 0 to 10 percent.

5. An off-site contract facility will be available if needed to perform RCS liquid and gaseous analyses and containment sump analysis in a timely manner in about a month. Capability presently exists to obtain grab samples of the sources refered above and procedures are presently available to transport and ship those samples to the off-site facility for analysis.

6. The post-accident sampling system is non-safety related and there are no surveillance Technical Specifications on the system at this time.

7. Granting this relief does not affect the licensees' capability to meet the requirements of 10 CFR 50.47 (b)(9) regarding assessment and monitoring actual or potential offsite consequences of a radiological emergency condition.

Environmental Consideration

We have determined that this amendment does not authorize a change in effluent types or total amount nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that this amendment involves action which is insignificant from the standpoint of environmental impact, and, pursuant to 10 CFR Section 51.5(d)(4), that an environmental impact statement or negative declaration and environental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

Based upon our evaluation of the proposed changes to the San Onofre, Unit 2 Technical Specifications, we have concluded that: (1) because this amendment does not involve a significant increase in the probability or consequences of accidents previously considered, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant decrease in a safety margin, this amendment does not involve a significant safety hazards consideration; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that the proposed changes are acceptable.

Dated: SEP 17 1982

OFFICE ▶							
SURNAME ▶							
DATE ▶							