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SUBJECT: Requests to discontinue weekly sample surveillances re fuel  
 handling isolation sys iodine & particulate radiation  
 monitors for plant.

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January 24, 1991

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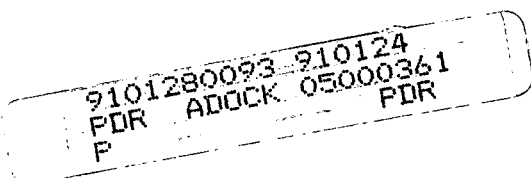
Gentlemen:

SUBJECT: Docket Nos. 50-361 and 50-362  
Weekly Iodine/Particulate Sample Surveillances for the  
Fuel Handling Isolation System Airborne Radiation  
Monitors  
San Onofre Nuclear Generating Station  
Units 2 and 3

REFERENCES:

- (1) Harold B. Ray to U.S. Nuclear Regulatory Commission, Document Control Desk, October 19, 1989, Docket Nos. 50-361 and 50-362, "Amendment Application Nos. 83 and 68," San Onofre Nuclear Generating Station, Units 2 and 3.
- (2) F. R. Nandy to U.S. Nuclear Regulatory Commission, Document Control Desk, February 9, 1990, Docket Nos. 50-361 and 50-362, "Amendment Application Nos. 83 and 68, Proposed Change Notice NPF-10/15-297," San Onofre Nuclear Generating Station, Units 2 and 3.
- (3) L. E. Kokajko to Harold B. Ray, April 12, 1990, "Issuance of Amendment No. 86 to Facility Operating License No. NPF-10 and Amendment No. 76 to Facility Operating License No. NPF-15 San Onofre Nuclear Generating Station, Unit Nos. 2 and 3 (TAC Nos. 75193 and 75194)."

This is a request to discontinue the weekly sample surveillances for the Fuel Handling Isolation System (FHIS) iodine and particulate radiation monitors for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3.



### Background

Southern California Edison (SCE) requested removal of the technical specification (TS) requirements for the FHIS iodine and particulate channels when it submitted Proposed Change No. 297 (PCN-297) on October 19, 1989 (Reference 1). On February 9, 1990, SCE submitted additional information in response to the NRC staff questions on PCN-297 (Reference 2). PCN-297 was a request to amend TS 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation," and TS 3/4.3.3.1, "Radiation Monitoring Instrumentation." PCN-297 asked to remove the operability requirements, the setpoints, and the surveillances for the iodine and particulate channels of the FHIS airborne radiation monitors. The change request stated that the detector equipment and filters would be abandoned in place preserving the capability for iodine grab sampling in the process stream. The proposed change did not remove the requirements for the two FHIS noble gas monitors. the noble gas monitors remain capable of generating the FHIS and isolating the Fuel Handling Building (FHB) ventilation system.

On April 12, 1990, the NRC approved PCN-297 and issued Amendment Nos. 86 and 76 for SONGS Units 2 and 3, respectively (Reference 3). The amendments deleted the technical specification requirements for the FHIS iodine and particulate radiation monitors. However, the NRC's Safety Evaluation Report (SER) stated: "The licensee proposes to remove the isolation function of the particulate and radioiodine monitors, but otherwise leave the air sampling media in place to be analyzed weekly for integrated activity." Due to this statement in the SER, we are presently taking weekly continuous samples from the FHIS iodine and particulate channels and analyzing them. Prior to this SER, SCE only replaced the FHIS iodine and particulate filters every week and did not analyze them.

### Discussion

The analysis of the FHIS iodine and particulate continuous samples is not necessary. SCE wishes to discontinue the weekly sample analyses. The filters will remain in place preserving the "in-process" iodine sample point for the FHB ventilation system as required in the Standard Review Plan (SRP), Section 11.5, Table 1. The filters will continue to be replaced weekly, but not be analyzed, and the sample point will be kept functional.

The sample point provides a means to investigate unusual activity readings in the Plant Vent Stack. There are three gaseous effluent pathways from SONGS Units 2 and 3: the Plant Vent Stack and the two unit specific containment purge pathways. The Fuel Handling Building (FHB) effluent stream is discharged through the

Stack radiation monitor satisfies the SRP requirements, Section 11.5 and Appendix 11.5-A, for continuous effluent stream sampling for iodine and particulates. Representative samples from the Plant Vent Stack are analyzed weekly. Gaseous effluent accountability is met with the Plant Vent Stack samples. Under normal circumstances, no specific accounting for the source of the activity is made. However, elevated activity readings at the Plant Vent Stack would trigger operating personnel to investigate and identify the source. Thus, for normal plant operations deleting the weekly FHIS iodine and particulate sample surveillances will not impact gaseous effluent accountability.

The results obtained to-date have shown either no detectable radioactivity or less than  $10^{-13}$   $\mu\text{Ci/cc}$ . The very low activity in each sample requires long counting times to meet the necessary lower limit of detectability. The sample collection process and analysis require approximately three man-hours to complete. Deleting the weekly FHIS sample analysis would allow SCE to re-direct the resources used for handling, measuring, and documenting the samples to meet other requirements and reduce the administrative burden. There are neither TS nor Offsite Dose Calculation Manual requirements related to either the FHIS channels or the analysis of weekly samples.

#### Summary

Based on the above discussion, SCE requests NRC approval to discontinue the weekly FHIS iodine and particulate samples analysis. Deleting the samples analysis does not impact either the safety analysis or the gaseous effluent accountability. Maintaining the filters in-place will allow a means to investigate unusual activity in the Plant Vent Stack.

If you have any questions regarding this request, please feel free to contact me.

Very truly yours,



cc: J. B. Martin, Regional Administrator, NRC Region V  
C. Caldwell, NRC Senior Resident INspector, San Onofre  
Units 1, 2 and 3