

DESCRIPTION OF PROPOSED CHANGE NPF-15-69 AND SAFETY ANALYSIS
OPERATING LICENSE NPF-15

This is a request to revise Section 2.C(17)d and Technical Specification 6.8.4.d of Facility Operating License NPF-15.

Existing Conditions

Section 2.C(17)d - Post-Accident Sampling

Prior to exceeding five (5) percent power, the post-accident sampling system shall be operable and post-accident sampling program shall be fully implemented.

Technical Specification 6.8.4.d - Post-Accident Sampling

A program* which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program* shall include the training of the personnel, the procedures for sampling and analysis and the provisions for maintenance of sampling and analysis equipment.

Proposed Changes

Section 2.C(17)d - Post-Accident Sampling

By September 1, 1983 the post-accident sampling system shall be operable and the post-accident sampling program shall be fully implemented.

Technical Specification 6.8.4.d - Post-Accident Sampling

A program** which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program** shall include the training of personnel, the procedures for sampling and analysis and the provisions for maintenance of sampling and analysis equipment.

Reason for Proposed Changes

SCE is seeking to defer the date when the post-accident sampling system (PASS) shall be operable and the post-accident sampling program shall be fully implemented for the following reasons:

1. By letters dated September 11, 14 and 15, 1982 and in a meeting with the NRC on September 13, 1982, SCE reported on a number of problems that were identified in the process of testing the PASS. The problems were not singly significant but collectively prevented SCE from declaring the PASS operable. Accordingly, SCE requested to defer the implementation date of the PASS for SONGS 2.

*Not required to be implemented prior to first exceeding 5% RATED THERMAL POWER.

**Not required to be implemented until September 1, 1983.

2. On September 17, 1982 the NRC issued an amendment to Facility Operating License No. NPF-10 in response to SCE's request and changed the date for operability of the PASS and for implementation of the post-accident sampling program to January 1, 1983.
3. By letter to the NRC dated September 27, 1982, SCE requested that the operating license for SONGS 3 provide relief for PASS implementation to "prior to first exceeding five (5) percent power." Accordingly, Facility Operating License No. NPF-15 includes such a requirement.
4. On December 21, 1982 SCE reported by letter to the NRC that the improvements and modifications required to correct the problems to the PASS that were identified in the September, 1982 letters and meeting have been completed. Individual testing of each individual item has also be completed but an extended unscheduled plant shutdown to replace reactor coolant pump seals prevented completion of the PASS Demonstration Test and the enhanced operating training on the PASS. SCE committed to complete these activities when the Unit 2 returned to power in early January, 1983.
5. In January, upon re-establishing proper test conditions following the plant outage, repairs to eliminate minor leakage of the fittings and valves and modifications to enhance reliability were shown to be necessary. These modifications delayed completion of the Demonstration Test until January 22, 1983. Operating instructions have continued to be refined during preparation for and conduct of the Demonstration Test. By letter dated February 9, 1983, SCE informed the NRC of the above circumstances and indicated that station operating procedures and "hands-on" training will require additional time.
6. On February 10, 1983, in the process of demonstrating the PASS, using the station procedures available at that time, to the NRC inspector from Region V additional shortcomings were identified with the PASS equipment. In addition, it was obvious that greater sophistication was required in the procedures and in the operator training to assure that a sample can be obtained and analyzed in the required 3 hour time period.
7. All of the above circumstances lead SCE to seek additional schedular relief from the license and technical specification requirements to make additional improvements to the PASS equipment, procedures and training program.

Safety Analysis

The proposed change defers the date when the PASS shall be operable and the post-accident sampling program shall be fully implemented. Proposed Change NPF-10-42 enclosed with SCE's letter to the NRC dated September 11, 1983 and

clarified by letters dated September 14 and 15, 1983, discussed alternate means to assess containment and reactor conditions should a major accident occur during the period of PASS implementation. Those alternate means discussed in the above documents, continue to be in effect.

Accordingly, it is concluded that: (1) Proposed Change NPF-15-69 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.