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 AUTH. NAME: AUTHOR AFFILIATION
 BASKIN, K.P. Southern California Edison Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Submits second progress rept. for post-accident sampling sys (PASS) as of 830701. Test verifying total as capability completed Mod outage for sys maint will be completed by 830820.

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Southern California Edison Company



P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

July 11, 1983

TELEPHONE
(213) 572-1401

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station, Units 2 and 3

Facility Operating License Nos. NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3), respectively, require that, "until September 1, 1983, SCE shall provide monthly progress reports on PASS testing, surveillance, maintenance and modifications, and operator training." This requirement appears as License Condition Nos. 2.C.(19)i.4 and 2.C.(17).d.4 for SONGS 2 and 3, respectively. The purpose of this letter is to provide the second such progress report as of July 1, 1983, for the SONGS 2 and 3 Post Accident Sampling System (PASS).

During the month of June, SONGS 3 remained in Operating Mode 5 and SONGS 2 operated at power levels up to 100 percent. On June 16, SONGS 2 reactor tripped from 100 percent power due to a low condenser vacuum signal resulting in turbine and reactor trip. SONGS 2 was shutdown for the remainder of the month of June to replace seals on all four reactor coolant pumps.

License Condition Nos. 2.C.(19)i.3 and 2.C.(17)d.3 for SONGS 2 and 3, respectively, require that the PASS be operable and the Post Accident Sampling (PAS) Program be implemented by September 1, 1983. Southern California Edison (SCE) considers the PASS operable and the PAS Program fully implemented on June 15, 1983, based on the following:

- A. The conditions of operability stated in Chemistry Procedure S0123-III-8.1 and the Safety Evaluation amendment of the NRC letter of April 29, 1983, have been met.
- B. The PASS surveillances required by Chemistry Procedure S0123-III-8.1 which include maintaining in effect the availability of Alternate Methods in accordance with Chemistry Procedure S0123-III-8.8 are being performed.

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July 11, 1983

- C. The PASS was operated repeatedly during "hands-on" training of PASS Operators. During training periods in May and June, the PASS consistently demonstrated reliable operation with no evidence of system leakage or system malfunction.
- D. The License Condition Nos. 2.C.(19)i.1 and 2.C.(17)d.1 for SONGS 2 and 3 concerning PASS procedures was previously met and reported in the SCE letter of April 14, 1983.
- E. As mentioned in SCE's letter dated June 10, 1983, "hands-on" training of four additional PASS Operators was initiated May 31, 1983. This training was completed June 12, 1983. At this time, SCE has six qualified PASS Operators in addition to the three Nuclear Training Division instructors who are qualified. The training records for these individuals are maintained in the Training Record Information and Management System (TRIMS).
- F. Personnel necessary to ensure that the requirements of the PAS Program are met will be on shift or on call at all times. When the PASS is available and required to be operational, SCE will have on shift or on call a qualified PASS operator and a nuclear chemical technician (who may not be a qualified PASS Operator). When the PASS is not available, such as during PASS outages, SCE will have knowledgeable personnel on shift to obtain data with the alternate methods that can be used to assess core damage in the event of an accident.

SCE considers that, under non-accident conditions, the PASS and the designated alternate methods used to assess core damage are required to be available only when either SONGS 2 or SONGS 3 is in Mode 1 or 2. This policy is consistent with the requirement for PASS surveillances as previously submitted in the SCE PAS Program Chemistry Procedure S0123-III-8.1.

On June 27, 1983, a PASS outage was initiated that is expected to last until mid-August. Work to be accomplished during the PASS outage involves modifications and improvements to the PASS that have been identified as desirable. These changes, which were discussed with the NRC between September 1982 and January 1983, will enhance the operability and maintainability of the PASS. The work involves the following:

- A. Installation of additional operator aids, such as:
 - 1. Additional indications to operators for monitoring the process.
 - 2. Remote indications in the normal sample lab of high radiation in the PASS lab.
- B. Installation of additional connections for improved surveillance testing.
- C. Installation of a dissolved oxygen analyzer which provides a new capability.

July 11, 1983

- D. Installation of isolation and drain valves for improved maintenance.
- E. Installation of a PASS lab habitability monitor to minimize the number of required support personnel.

The forecasted completion date of the outage is August 20, 1983. An updated assessment of the completion date will be addressed in next month's status report.

Progress on PASS to July 1, 1983, is as follows:

Startup Testing

Several tests were conducted to verify the total gas capability of the PASS using a method provided by Bechtel Power Corporation. The tests verified that the total gas capability will provide accurate reproducible results. Previous problems can now be attributed to high concentrations of nitrogen in the pure water source.

Surveillance

All PASS surveillances for the month of June were completed. During the PASS outage that began June 27, 1983, the designated compensatory methods delineated in Chemistry Procedure, S0123-III-8.8, will remain in effect when either unit is in Mode 1 or 2.

Maintenance and Modifications

The ongoing PASS outage is discussed above.

Operator Training

Operator Training is discussed above.

If you have any questions, please call me.

Very truly yours,

W P Buslam

cc: J. B. Martin, Regional Administrator NRC Region V
H. Rood (To be opened by addressee only)
A. E. Chaffee (Resident Inspector, San Onofre, Units 2 and 3)
R. J. Pate (Resident Inspector, San Onofre, Units 2 and 3)
P. J. Stewart (Resident Inspector, San Onofre, Units 2 and 3)