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MAY

ACCESSION NBR: 8309070376 DOC. DATE: 83/09/02 NOTARIZED: NO DOCKET #
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
 AUTH. NAME AUTHOR AFFILIATION
 MEDFORD, M.O. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Discusses four recommendations made by GE to reduce calibr time for improving maint. of containment integrity.

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NOTES: J Hanchett 1cv PDR Documents. ELD Chandler 1cv. 05000361
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Southern California Edison Company



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

September 2, 1983

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

Southern California Edison Company's (SCE) letters dated April 20, 1983 and July 18, 1983 regarding the in containment Post LOCA Hydrogen Monitoring System stated that SCE was evaluating methods for reducing the time during which the calibration gas containment isolation valves are open. As stated in the July 18, 1983 submittal, SCE had requested vendor (General Electric) assistance in an effort to reduce the calibration time, thereby improving the maintenance of containment integrity. Four recommendations were made by the vendor to reduce calibration time. These recommendations and corresponding actions being taken by SCE are discussed below:

1. Eliminate Use Of Calibration Gases From The 31 Day Channel Functional Test

The vendor does not consider the use of calibration gases for the 31 day channel functional test necessary to ensure instrument operability. Although, in the past, SCE has considered it good practice to do so, the use of calibration gases for the channel functional test conflicts with the requirement to minimize violation of containment integrity. SCE will eliminate the use of the calibration gases from the 31 day channel functional test procedure.

2. Use Only 0% And 4% Hydrogen Gases For The 92 Day Channel Calibration

The Technical Specifications currently require the use of 2% and 4% hydrogen gases for channel calibration. Because the zero point must be determined, SCE also uses 0% and 10% hydrogen calibration gases.

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September 2, 1983

The vendor has stated that the sensor is inherently linear and that only a 0% hydrogen and one other on scale concentration of hydrogen gas (e.g. 4%) need be used for calibration. In that the elimination of the 2% and 10% hydrogen gases will reduce the time during which the calibration gas containment isolation valves are required to be open, SCE will submit a license amendment request to allow the use of only 0% and 4% gases, and when approved, will adopt this procedure.

3. Replace Hydrogen Sensors Which Are Suspected of Having Oxidized Electrodes

Although this is not apparent from any of the vendor documentation, the vendor has informed SCE that the sensors must be exposed to hydrogen periodically (i.e. during calibration) to maintain electrolyte hydrogen ion concentration to prevent electrode oxidation. Electrode oxidation results in increased response time and therefore increased calibration time. The vendor has recommended that SCE replace any sensors which are suspected of having oxidized electrodes. SCE will replace those hydrogen sensors which show the characteristics of having oxidized electrodes, as indicated by a very long calibration response time.

4. Replace Sensors With New Faster Response Sensors

General Electric (GE) has informed SCE that they have recently developed a new hydrogen sensor which externally is physically identical to the present model but has an improved electrode design resulting in much faster response. GE has not yet environmentally qualified this sensor. However, as improved response will further reduce calibration time, SCE will follow GE's progress and consider upgrading to the new sensors in the future.

Should you have any questions regarding the information in this letter, please call me.

Very truly yours,



M. O. Medford
Supervising Engineer
San Onofre Units 2&3 Licensing

cc: Harry Rood, NRC (To be opened by Addressee only)
A. E. Chaffee, NRC Site Inspector/SONGS 2 & 3