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SUBJECT: Discusses compliance w/NUREG-0737, Item II.B.1 requiring installation of RCS vents. C-E Owners Group emergency operating procedure guidelines acceptable basis for plant-specific RCS vent sys operating procedures.

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October 19, 1984

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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

NUREG-0737, "Clarification of TMI Action Plan Requirements," Item II.B.1 required the installation of Reactor Coolant System (RCS) Vents at San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. The RCS vents were installed prior to issuance of operating licenses for both units. The RCS vents are designed to be utilized for both normal venting and filling operations (e.g., in Mode 5) and emergency post accident situations. The NRC staff evaluation of the SONGS 2 and 3 RCS vents is contained in NUREG-0712, "Safety Evaluation Report Related to the Operation of San Onofre Nuclear Generating Station, Units 2 and 3," Supplement Nos. 1 and 4. Supplement No. 4 prohibits use of the RCS vent system prior to NRC staff review of the operating procedures. Operating procedures were submitted for NRC staff review by letter dated April 27, 1984.

The NRC's letter to the Southern California Edison Company (SCE), (D. M. Crutchfield to R. Dietch), dated August 29, 1983, provided the staff's evaluation of RCS vents for San Onofre Nuclear Generating Station, Unit 1, Docket No. 50-206. In this letter, the staff's position is that the NUREG-0737, Item II.B.1 requirement for RCS vents is superseded by 10 CFR 50.44(c)(3)(iii). 10 CFR 50.44 requires that all operating reactors, in order to provide the improved operational capability required by the rule must have the RCS vents installed, operational, procedures established and personnel trained in accordance with the schedule provided in the rule. The rule does not require prior NRC approval of the procedures.

In addition, in its evaluation of the SONGS 1 RCS vents relative to the NUREG-0737 requirements, this letter indicates that the staff considers that staff approved owners group emergency operating procedure guidelines provide an acceptable basis for plant specific RCS vent system operating procedures. SCE considers that this position applies equally to SONGS Units 2 and 3. The SONGS 2 and 3 RCS vent system operating procedures are based upon the staff approved Combustion Engineering Topical Report, CEN-152, Revision 1, "Combustion Engineering Emergency Operating Procedure Guidelines," which addresses the use of RCS vents.

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Mr. G. W. Knighton

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October 19, 1984

Based on the staff's position on RCS vent operating procedures for SONGS Unit 1 and the fact that 10 CFR 50.44 supercedes the NUREG-0737 requirements relating to RCS vents, SCE concludes that NRC approval of the SONGS 2 and 3 RCS vent system operating procedures is no longer required prior to use of the system.

If you have any questions regarding this position, please call me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. D. Medford".

cc: Harry Rood, NRC (To be opened by addressee only)  
A. E. Chaffee, NRC Resident Inspector