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 MEDFORD, M.O. Southern California Edison Co.  
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 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Requests inclusion of manual actuation of turbine generator isolation sys on detection of chlorine or ammonia. Requirement will be implemented after Proposed Change NPF-10/15-135 become effective.

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*Southern California Edison Company*

**SCE**

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M.O. MEDFORD  
MANAGER, NUCLEAR LICENSING

November 9, 1984

TELEPHONE  
(213) 572-1749

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

The Southern California Edison Company's (SCE) letter dated April 6, 1984 submitted Proposed Change NPF-10/15-135 relating to toxic gas isolation system (TGIS) setpoints. The proposed change will revise the setpoints from 6.0 ppm to 14.3 ppm for chlorine, 42.4 ppm to 97 ppm for ammonia and 84.8 ppm to 193 ppm for butane/propane. The proposed change deletes the requirement to actuate TGIS on carbon dioxide. These setpoint changes will help reduce the number of spurious TGIS actuations currently being experienced.

In recent discussions the staff raised a new concern regarding the revised ammonia and chlorine setpoints. The revised setpoints are above the threshold limit values for exposure to these substances. Thus, it would be possible for concentrations exceeding the chronic exposure limits to exist without an alarm or automatic protective action. Because of this concern the staff requested that SCE include in operating procedures a requirement to manually actuate TGIS on detection of chlorine or ammonia if such a requirement does not already exist. Such a provision would resolve this concern.

SCE has reviewed the SONGS 2 and 3 operating procedures and has confirmed that currently there is no such provision. Accordingly, SCE will implement a procedural requirement to manually actuate TGIS in the event that an airborne irritant, from an unidentified source, is detected by the control room staff. The non-specific reference to "airborne irritant" instead of ammonia and chlorine addresses the fact that, although man would notice the presence of an irritant at ammonia concentrations below the threshold limit value of 25 ppm, man cannot identify the irritant as ammonia at concentrations of less than 40 ppm. The procedure will not require manual TGIS actuation if the source of the irritant is identified, e.g., ammonia cleaners being used by the janitorial staff.

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November 9, 1984

SCE will implement the procedural requirements for manual TGIS actuation described above, prior to making the ammonia and chlorine detector setpoint changes which will be allowed after the license amendment approving Proposed Change NPF-10/15-135 becomes effective. SCE considers that this commitment resolves any remaining staff concerns regarding the TGIS setpoint change.

If you have any questions regarding the information provided by this letter, please call me.

Very truly yours,



cc: Harry Rood, USNRC (to be opened by addressee only)  
Joseph O. Ward, (California Department of Health Services)  
F. R. Huey, (USNRC Senior Resident Inspector, Units 1, 2, & 3)  
J. B. Martin (USNRC Regional Administrator, Region V)