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SUBJECT: Discusses recent problem re interpretation of Tech Spec
 3/4.4.7 specifying limits on RCS activity. Escalation through
 modes while complying w/applicable RCS sampling & analysis
 surveillance requirements considered 3.0.4 exception intent.

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July 10, 1985

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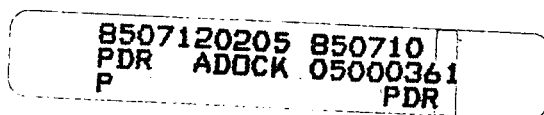
Gentlemen:

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

The purpose of this letter is to discuss a recent problem encountered with the interpretation of Technical Specification 3/4.4.7, "Specific Activity," for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. Technical Specification 3/4.4.7 specifies limits on activity in the Reactor Coolant System (RCS). This Technical Specification is applicable in Modes 1 through 5. If the plant is at greater than 500°F in Modes 1 through 3 and the specific activity limits are exceeded, Action "a" is invoked. Action "a" allows operation to continue with the activity limits exceeded for up to 48 hours. Action "a" includes an exception to Specification 3.0.4 which permits escalation to higher operational modes while complying with the action requirements. In parallel with Action "a," Action "d" is invoked in Modes 1 through 5 if the specified activity limits are exceeded. Action "d" is a reporting requirement and restates the applicable RCS sampling and analysis surveillance requirements which must be followed, regardless of being specified in the action.

The problem arises because Action "d" does not have a 3.0.4 exception. One interpretation is to assume that, while complying with Action "d" (which is any time when one is in Action "a"), proceeding to a higher mode, is prohibited. Under this interpretation, the 3.0.4 exception for Action "a" would be nullified.

SCE's position is that compliance with Action "d" does not constitute reliance on an action statement for continued operation. Since 3.0.4 applies only where continued operation is contingent upon "reliance" on the provisions of an action statement, a 3.0.4 exception is not required for Action "d". Under this interpretation, escalation through the modes while in compliance with Action "a" and "d" is permitted. We believe that this was the original intent of the 3.0.4 exception. SCE will continue to operate according to this interpretation unless advised otherwise.



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- Mr. G. W. Knighton

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It should be noted that Technical Specification 3/4.4.7 is a Standard Technical Specification common to the other three PWR vendors, and the proper interpretation has generic implications.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. L. Meador".

cc: H. Rood (To be opened by addressed only)
F. R. Huey