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 AUTH. NAME AUTHOR AFFILIATION
 BASKIN, K. P. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MIRAGLIA, F. Licensing Branch 3

SUBJECT: Forwards Proposed Change NPF-10-42 to License NPF-10
 consisting of request to defer implementation date of
 post-accident sampling sys. Formal request for amend to
 license & appropriate fees will be submitted wk of 820913.

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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

September 11, 1982

TELEPHONE
(213) 572-1401

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

Gentlemen:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station
Unit 2

Enclosed for your review and approval is a copy of Proposed Change NPF-10-42 to Facility Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2. The proposed change is a request to defer the implementation date of the Post-Accident Sampling System (PASS).

License Condition 2.C(19)i and Technical Specification 6.8.4.d currently require that the PASS be operable prior to exceeding five(5) percent power (Mode 1). NRC approval of the proposed change is requested to facilitate the entry of Unit 2 into Operational Mode 1. A formal request for an amendment to Facility Operating License No. NPF-10 detailing this proposed change will be transmitted to the NRC during the week of September 13, 1982. The formal request will include a check in the amount of \$4,000.00 for this change which has been determined to be a Class III change in accordance with 10 CFR 170.22.

The reason for the request is that a number of problems have been recently identified in the course of PASS demonstration testing. These problems are not singly significant but collectively prevent the Company from declaring the PASS operable. Prior to this determination, it was believed that the problems were few in number, and of a maintenance nature that could be corrected routinely.

Representative problems are:

- 1) heat tracing of piping external to skid is undersized,
- 2) hydrogen and oxygen monitor analysis results are not reliable,
- 3) level indicator modification is required on the burette and the depressurized liquid sample vessel, and
- 4) valve replacement or modification is required to process the containment sump sample.

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Mr. Frank Miraglia

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September 11, 1982

These problems involve design and material lead time, fabrication and installation times that preclude their correction prior to the scheduled 5% power date. It is estimated that the problems can be satisfactorily resolved within about three and one half months.

The SONGS 2 PASS is a prototype system still in the development stages. In order to satisfy schedule commitments the system was accepted from CE before it had undergone the usual proof testing for proto typical type systems. As previously mentioned, the problems encountered were only judged to be significant during the process of system type demonstration testing. These problems would not be expected to identify themselves during prerequisite and preoperational testing. Therefore, rather than trying to accept a marginally operable system, the Company believes that the problems should be corrected now while power levels are low and there is minimal radiation exposure to workers in the area.

Alternate means are available to sample reactor coolant and containment atmosphere. The sampling system used during normal operation is available and is working properly. Samples are routinely being taken as required by Technical Specifications. In addition, the post LOCA containment hydrogen monitor is operable and capable of analyzing containment atmosphere samples. The post-accident sampling system is non-safety related and there are no surveillance Technical Specifications on the system at this time.

Accordingly, it is respectfully requested that Proposed Change NPF-10-42 be reviewed promptly and appropriate action taken. If you have any questions concerning the enclosed information, please call me.

Very truly yours,

M. O. Medford for KPB

Enclosure

DESCRIPTION OF PROPOSED CHANGE NPF-10-42 AND SAFETY ANALYSIS
OPERATING LICENSE NPF-10

This is a request to revise Section 2.C.(19)i of Facility Operating License NPF-10 and to revise Technical Specification 6.8.4.d.

Existing Condition and Technical Specification

Section 2.C.(19)i Post-Accident Sampling (II.B.3, SSER No.1, SSER No. 4, Section 1-12, SSER No. 5)

Prior to exceeding five (5) percent power, the post-accident sampling system shall be operable and the post-accident sampling program shall be fully implemented.

Technical Specification 6.8.4.d Post-Accident Sampling

A program* which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program* shall include the training of personnel, the procedures for sampling and analysis and the provisions for maintenance of sampling and analysis equipment.

* Not required to be implemented prior to first exceeding 5%
RATED THERMAL POWER.

Proposed Changes

Section 2.C(19)i Post Accident Sampling (II.B.3, SSER No. 1, SSER No. 4, Section 1-12, SSER No. 5)

The post-accident sampling system shall be operable and the post-accident sampling program shall be fully implemented by January 1, 1983.

Technical Specification 6.8.4.d Post-Accident Sampling

A program* which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program* shall include the training of personnel, the procedures for sampling and analysis and the provisions for maintenance of sampling and analysis equipment.

* Not required to be implemented prior to January 1, 1983.

Reason for Proposed Changes

SCE is seeking to defer the implementation date of the post-accident sampling program for the following reasons:

1. During final acceptance testing of the post-accident sampling system(PASS) using actual reactor coolant sample, with the reactor operating at low power, numerous hardware problems

1. continued

were encountered which precluded SCE from obtaining certain required analyses. Additionally, repeatability of results could not be demonstrated for some analyses. These deficiencies were not experienced during preoperational testing. Hardware modifications to correct the deficiencies encountered require a material delivery lead time of from one to two months. After the hardware modifications are completed additional time is needed to train station personnel on the modified system to insure reliable and repeatable sampling capability.

2. Alternate means are available to sample reactor coolant and containment atmosphere. The sampling system used during normal operation is available and is working properly. Samples are being taken as required by Technical Specifications. The high range containment radiation monitor, the containment hydrogen monitor, and the containment purge wide range radiation monitor are available and do provide additional information regarding post-accident conditions.
3. SCE was one of the first utilities to order and install a PASS. This was done on an accelerated engineering schedule for a system with no previous operating history.

Safety Analysis

The proposed change delays the implementation dates of the PASS. The proposed change will significantly reduce exposure to operating and construction personnel during the implementation period for the subject modification.

The unavailability of the PASS will not present a significant loss of information necessary to assess containment and reactor conditions should a major accident occur during the period in question. Alternate containment monitoring equipment as described above is installed and operable. In addition, off-site post-accident sampling equipment developed since TMI could be contracted for and utilized if the need arose. Further the PASS performs no direct safety system.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-42 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.