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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Implementation of Portions of Amendments 127 and 116  
San Onofre Nuclear Generating Station  
Units 2 and 3

Reference: Letter, Mel B. Fields (NRC) to Harold B. Ray (SCE), Subject,  
"Issuance of Amendment for San Onofre Nuclear Generating Station,  
Unit No. 2 (TAC No. M86191) and Unit No. 3 (TAC No. M86192),"  
dated, February 9, 1996

This letter is to identify that portions of Amendments 127 and 116 LCO 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)" are being implemented. Specifically, the Completion Times in restoring inoperable channels of the Containment High Range Area Monitor to operable status is being implemented.

**Background**

Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Environs Conditions During and Following an Accident," requires Licensees to have instrumentation that indicates possible gross failure of fuel cladding, or that a release may have originated from the primary containment due to a break in the reactor coolant pressure boundary (Type A instrumentation). The Containment High Range Area Monitor is considered Type A instrumentation. In accordance with guidance provided in the new Combustion Engineering Standard Technical Specifications, NUREG-1432, Revision 0, operability requirements for this monitor are moved to LCO 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)," from LCO 3.3.3.1, "Radiation Monitoring Instrumentation."

Recently, problems with Containment High Range Area Monitor 2RT-7820-1 surfaced when a relatively small change in the local area temperature initiated by the fan inside containment actuated 2RT-7820-1. A special test was performed to find the dependency of 2RT-7820-1 sensitivity to the accident temperature changes associated with design basis accidents (LOCA/MSLB). The results showed that a coaxial cable which connects the RE-7820-1 detector with

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a remote readout/alarm/control module is highly sensitive to the local temperature changes. The Area Radiation Monitoring System Design Bases requires the system operate for 120 days following a design basis LOCA.

The testing also revealed that moisture may travel along the cable shield into the connector, thereby shorting out the connector. Although the SONGS Containment Penetration design is significantly different than the penetration configuration during testing, sufficient similarity exists to place the operability of the High Range Radiation Monitor (HRRM) in doubt.

### **Description of Technical Specifications**

The existing Technical Specification, 3.3.3.1, "Radiation Monitoring Instrumentation," (Table 3.3-6, Actions 18, 18a, and 19) requires restoration of inoperable channels to operable status within 48 hours, or be in Hot Shutdown within the next 12 hours. Also, a Special Report should be prepared and submitted to the NRC within 14 days in accordance with TS 6.9.2.

The revised Technical Specification, LCO 3.3.11, approved by NRC License Amendment Nos. 127 and 116, referenced above, requires inoperable channels to be restored to operable status within 30 days when one channel is inoperable. If two channels are inoperable, the LCO requires restoring one channel to operable status within 7 days, and if this requirement cannot be met, a Special Report should be submitted to the NRC within 30 days in accordance with LCO 5.7.2. Amendments 127 and 116 were issued effective as of date of issuance, February 9, 1996, to be implemented no later than August 9, 1996.

The enclosed pages provide markups to the existing Technical Specifications for Units 2 and 3 to implement the new Specification for the Containment Radiation Monitors.

### **Basis for Acceptability of Request**

There is no safety significance to early implementation of the provisions of the new Specifications based on the following. First, it is acceptable because there is no adverse interaction among the revised Specifications and other existing Technical Specification requirements. Early implementation would permit use of extended Completion Times for inoperable instruments, and avert an unnecessary plant shutdown.

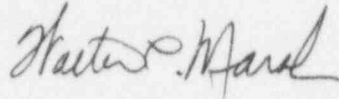
Second, in accordance with the reference to this letter, the revised Specifications are based on NUREG-1432, an approved revised set of Standard Technical Specifications. In its review the Staff found the use of the improved Specifications acceptable for continued operation of SONGS Units 2 and 3.

By the provisions of the new specifications, alternate means of monitoring will be initiated within seven days, and if not, the plant will be shut down. A Special Report will be submitted within the following 30 days. In addition to the provisions of 5.7.2.a, the Special Report will include discussion as to

whether the alternate means are equivalent to the installed PAMI channel, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAMI channels.

If you would like additional information regarding this information, please let me know.

Sincerely,



Enclosure

cc: L. J. Callan, Regional Administrator, NRC Region IV  
J. E. Dyer, Director, Division of Reactor Projects, Region IV  
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV  
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M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3