

# PUBLIC SUBMISSION

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**Docket:** NRC-2012-0192

Application and Amendment to Facility Operating License Involving Proposed No Significant Hazards Consideration Determination

**Comment On:** NRC-2012-0192-0001

Southern California Edison, San Onofre Nuclear Generating Station, Units 2 and 3; Application and Amendment to Facility Operating License Involving Proposed No Significant Hazards Consideration Determination

**Document:** NRC-2012-0192-DRAFT-0001  
Comment on FR Doc # 2012-20114

*8/16/2012* *(1)*  
*77 FR 49463*

## Submitter Information

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**Organization:** Citizens Oversight Projects (COPS)  
**Government Agency:** Public

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## General Comment

The primary change to the license is to move surveillance frequencies from the license document to a document under the control of the operator. This change would only be entertained if it were a desire to decrease the frequency of surveillance to save money. COPS objects to these changes for the following reasons.

We see two categories of surveillances:

- (1) Critical operational parameters to allow the reactor to continue to operate safely and detect a failure, and
- (2) Tests of backup and safety equipment not necessary for the normal operation of the plant but standing ready in case of emergency.

It is our observation that Category (1) surveillance frequencies are far too low (infrequent) to allow operators to detect a developing failure at the plant.

EX: checking leakage from the steam generators every 72 hours is ridiculously infrequent. A leak can progress quickly within only a matter of hours during a SGTR, and if the operator waits for 72 hours to detect that failure, the plant will certainly be experiencing a LOCA.

*SURVEILANCE Review Complete*

*FRIDS = ADM-03*

*Temp Note = ADM-013*

*all = J. Sebrosky (JM53)*

COPS says:

--> Classify all surveillances according to whether they are in class 1 or 2.

--> Increase substantially the surveillance frequencies in Class 1 to reflect the need to detect rapid deterioration in a SGTR, for example. These should NOT be moved to the Surveillance Frequency program.

--> CLASS 2 surveillances must Include minimum frequencies (or maximal time intervals between inspections) in the license document to insure that the licensee adheres to a reasonable limits for inspections of parameters in CLASS 2.

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**Document:** NRC-2012-0192-DRAFT-0002

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## Submitter Information

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## General Comment

Attachment 1 Vol 7 (Chapter 3.4 Reactor Coolant System (RCS)) - ML11251A100

ON Page 99, the proposed change is to reduce SG level from 25% to 20%. this significantly reduces the level for reactor trip. Proposal under consideration is to change 25% to 20% in two places here. This is the reverse of most changes that go from 25% to 50%, and may be a mistake. Perhaps 20% should be 50%.

The text is:

&lt;blockquote&gt;

Each OPERABLE loop consists of two RCPs providing forced flow for heat transport to an SG that is OPERABLE. SG, and hence RCS loop, OPERABILITY with regard to SG water level is ensured by the Reactor

Protection System (RPS) in MODES 1 and 2. A reactor trip places the plant in MODE 3 if any SG level is &#8804; [25]% as sensed by the RPS. The minimum water level to declare the SG OPERABLE is [25]%.</blockquote>

&lt;/blockquote&gt;

---> This proposed change is a reduction of the level of water in the steam generator to allow the reactor to run. COPS objects to this loosening of licensee requirement and puts the plant in severe danger.

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## Submitter Information

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## General Comment

COPS is concerned that that the surveillance frequency is too infrequent for checking the status of critical operational measurements to account for the rapid response needed in a real failure event.

\* Attachment 1 Vol 7 (Chapter 3.4 Reactor Coolant System (RCS)) - ML11251A100

\* Page 351 - CTS SR 3.4.13.2 requires verifying that primary to secondary LEAKAGE is 150 gallons per day through any one SG every 72 hours. ITS SRs 3.4.13.1 and 3.4.13.2 require similar surveillances and specify the periodic Frequencies as "In accordance with the Surveillance Frequency Control Program." This changes the CTS by moving the specified Frequency for the SR and the Bases for the Frequency to the Surveillance Frequency Control Program.

---> We assert that this spec (operator much check leakage rate every 72 hours) is far too lax because the leakage can progress from a small leak to a major SGTR in only an hour or two. The SONGS steam generator leak started at a 75 gpd rate and within one hour had increased to 104 gpd. Waiting 72 hours would allow this to progress to a full SGTR and perhaps LOCA.

---> Waiting for this leak to progress to 150 gal/day rate is far too lax to detect a dangerous operating condition in the plant.

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## General Comment

The operational license has a severe internal inconsistency. On one hand, it says there can be no pressure boundary leakage at all, due to material degradation.

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 From Technical Specification:

No pressure boundary LEAKAGE is allowed, being indicative of material deterioration. LEAKAGE of this type is unacceptable as the leak itself could cause further deterioration, resulting in higher LEAKAGE. Violation of this LCO could result in continued degradation of the RCPB. LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE.

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 Definition from 10CFR 50.2 (definitions)

\*Reactor coolant pressure boundary\* means all those pressure-containing components of boiling and pressurized water-cooled nuclear power reactors, such as pressure vessels, piping, pumps, and valves, which are:

(1) Part of the reactor coolant system...

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But then, it allows significant leakage to occur, up to 150 gallons per day through any one SG, and they have to check for this.

---> The definition of pressure boundary or the technical specification regarding leakage must be revised to achieve internal consistency. Now, the document is inconsistent because it first says no leakage is allowed, and then it allows leakage of up to 150 gal/day which is then released into the environment.

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**Comment On:** NRC-2012-0192-0001

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## General Comment

\* Attachment 1 Vol 10 (Chapter 3.7 Plant Systems) - ML11251A103, Page 99 - ADV - Atmospheric Dump Valve - The ISTS LCO 3.7.4 is being changed from "Two ADV lines shall be OPERABLE" to "One ADV line per required steam generator shall be OPERABLE." The ISTS is written such that there are two ADV lines per SG. SONGS has just one ADV line per SG and in MODE 4 SONGS could have one SG being utilized for heat removal. If the LCO required two ADV lines to be OPERABLE, SONGS would be in an ACTION unnecessarily. Therefore, the LCO was changed to require one ADV line per required steam generator. Also, due to SONGS just having one ADV line per steam generator, the Completion Time for ACTION A was changed from 7 days to 72 hours. These changes are also consistent with the SONGS Units 2 and 3 CTS.

---> We object to this design deficiency in the SONGS plant. This points out a design deficiency of SONGS compared with other plants.

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Page 101: This part was deleted: "Two ADV lines per steam generator are required to meet single failure assumptions following an event rendering one steam generator unavailable for Reactor Coolant System (RCS) heat removal."  
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Page 102: "The design must accommodate the single failure of one ADV to open on demand;

(following deleted:) thus, each steam generator must have at least two ADVs. (end delete)

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---> Since the design must accommodate the single failure of one ADV, how is this accomplished if there is only one ADV per SG??

---> We object to this change to the license which incorrectly allows a single ADV. The requirement for two ADVs should be maintained and SONGS should continue to be in violation of that constraint.



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**Government Agency:** Public: See CitizensOversight.org

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## General Comment

### INADEQUATE EXCLUSION AREA CONTROL

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10 CFR 50.02 (excerpt)

Exclusion area means that area surrounding the reactor, in which the reactor licensee has the authority to determine all activities including exclusion or removal of personnel and property from the area. This area may be traversed by a highway, railroad, or waterway, provided these are not so close to the facility as to interfere with normal operations of the facility and provided appropriate and effective arrangements are made to control traffic on the highway, railroad, or waterway, in case of emergency, to protect the public health and safety. Residence within the exclusion area shall normally be prohibited. In any event, residents shall be subject to ready removal in case of necessity. Activities unrelated to operation of the reactor may be permitted in an exclusion area under appropriate limitations, provided that no significant hazards to the public health and safety will result.

=====  
--> The exclusion zone at San Onofre Nuclear Generating Station includes a freeway and an accessible beach. There are no signs warning people that ingress to the area may subject them to

higher than specified radiation in the event of a rapid emergency situation.

---> Contrary to the definition of an exclusion zone, there is no means to stop traffic on the freeway in the event of a SGTR or LOCA, events that can progress within minutes and may require the complete shutdown of the freeway. Licensee should be required to install gates and turn-arounds to allow that traffic be completely stopped on the freeway and rerouted to other roads.

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## Attachments

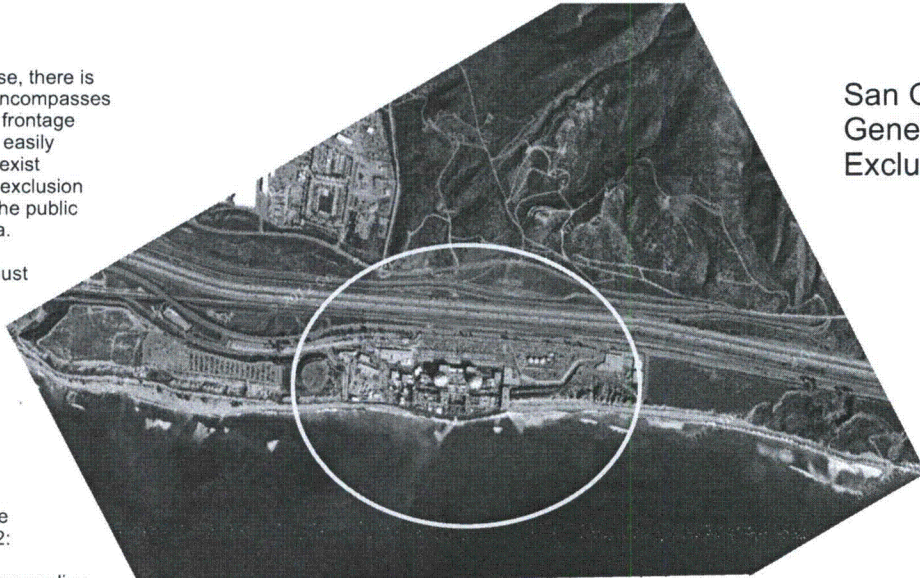
SanOnofreExclusionZone

According to the San Onofre license, there is an exclusion area defined which encompasses a large section of the freeway, the frontage road, and the beach area which is easily accessible to the public. No signs exist informing the public that this is an exclusion area and concern for radiation to the public occurs at the boundary of this area.

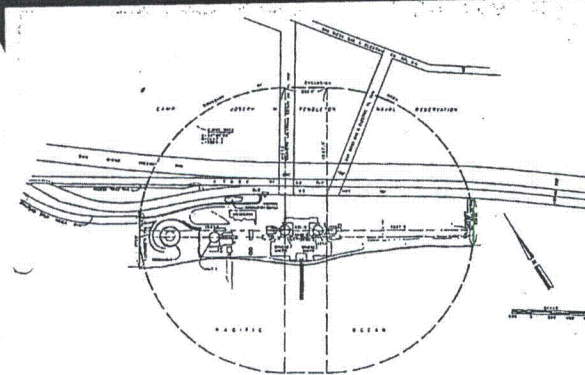
The license also says that there must be a way to control traffic on the roads next to the plant but there is no control to this area of the freeway that I have seen. I would think they would have to install lights and gates at the previous overpass so cars can be easily stopped and turned away.

The following is the definition of the "Exclusion area" from 10 CFR 50.2:

*Exclusion area* means that area surrounding the reactor, in which the reactor licensee has the authority to determine all activities including exclusion or removal of personnel and property from the area. This area may be traversed by a highway, railroad, or waterway, provided these are not so close to the facility as to interfere with normal operations of the facility and provided appropriate and effective arrangements are made to control traffic on the highway, railroad, or waterway in case of emergency, to protect the public health and safety. Residence within the exclusion area shall normally be prohibited. In any event, residents shall be subject to ready removal in case of necessity. Activities unrelated to operation of the reactor may be permitted in an exclusion area under appropriate limitations, provided that no significant hazards to the public health and safety will result.



## San Onofre Nuclear Generating Station Exclusion Zone



The diagram above is excerpted from the San Onofre operating license, and the map above it is the approximate outline when shown on a satellite map.

Citizens' Oversight Projects (COPS)  
Sept. 17, 2012 V1 (Ray Lutz)

See [CitizensOversight.org](http://CitizensOversight.org) for more information.