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April 14, 1996

3684

The Honorable Shirley Jackson
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Reference 1: SONGS Amendment Request (copy enclosed)

Dear Chairman Jackson:

Your help is needed to reject the San Onofre Nuclear Generating Station (SONGS) amendment request described in the enclosure (Reference 1). This amendment would extend the allowed outage time of critical safety equipment using probabilistic analysis as justification. Among the equipment included in the amendment request is Safety Injection System components. Please be aware of the fact that on September 3, 1981 the SONGS Unit 1 Safety Injection System (SIS) failed at or near full power. Fortunately the core remained covered so there was no fuel melt down. The nuclear industry has always contended using probability methods and other hand waving techniques that the SIS is assured to function properly when called upon and the "crazies" do not know what they are talking about. But the SIS failed at SONGS on at least one occasion and it did not save the core at TMI either. Unlike SONGS Unit 1, the TMI SIS was a modern improved design built to much better engineering and Quality Assurance standards.

There is an attempt to justify most of the reductions in safety margins requested in Reference 1 with Probabilistic Safety Analysis (PSA) and other probabilistic risk assessments techniques. One only has to look at the WASH-1400 (Rasmussen/MIT) Report and the history of SIS failures to realize that public safety can not be assured with probabilistic analysis.

If SONGS is justified in reducing allowed outage times as requested in Reference 1 why did they commit to the the longer times in the first place? Could it have been to get their operating license following TMI and then pull a bait and switch later when they think no one is watching to reduce regulatory requirements so the nuclear plant can compete with clean, safe, cheap, and abundant natural gas.

SONGS is owned by Edison International which has almost unlimited financial power to employ what ever legal, technical and public relation forces is needed to steam roll over those of us who own homes in south San Clemente. Please help level the playing field. It is necessary for the NRC to reject reductions in safety as proposed in Reference 1 to assure our health and safety. We already have too much spent fuel dumped in our backyard. In Licensee Event Report No. 81-011 SONGS admitted to contamination of the beach. What contamination events occurred which we have yet to discover since it is so difficult for the public to obtain correspondence between SONGS and the NRC?

Sincerely,

Glen R. Mills
Glen R. Mills

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Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, San Diego County, California

Date of amendment requests: November 2, 1995

Description of amendment requests: The licensee proposes to revise Technical Specification (TS) 3.8.1, "AC Sources - Operating," of the improved TS, to (1) extend the offsite circuit allowed outage time (AOT) from "72 hours AND 6 days from discovery of failure to meet LCO" to "72 hours AND 10 days from discovery of failure to meet LCO" and (2) extend the emergency diesel generator (EDG) AOT from "72 hours AND 6 days from discovery of failure to meet LCO" to "7 days AND 10 days from discovery of failure to meet LCO." Additionally, the licensee proposes to further extend the EDG AOT to "10 days AND 10 days from discovery of failure to meet LCO" on a once-per-refueling cycle frequency for maintenance purposes.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The Emergency Diesel Generators (EDGs) are backup alternating current power sources designed to power essential safety systems in the event of a loss of offsite power. EDGs are not accident initiators in any accident previously evaluated. Therefore, this change does not involve an increase in the probability of an accident previously evaluated.

The EDGs provide backup power to components that mitigate the consequences of accidents. The proposed changes to the Allowed Outage Times (AOTs) do not affect

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Federal Register Volume 61, Number 70 Page 15996//

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any of the assumptions used in the deterministic safety analysis.

To fully evaluate the effect of the EDG AOT extension, Probabilistic Safety Analysis (PSA) methods were utilized. The results of these analyses show no significant increase in the core damage frequency. As a result, there would be no significant increase in the consequences of accidents previously evaluated.

Therefore, this change does not involve a significant increase in the probability or consequences of any accident previously

evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed change does not alter the design, configuration, or method of operation of the plant. Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed changes do not affect the Limiting Conditions for Operation or their Bases that are used in the deterministic analyses to establish the margin of safety. PSA evaluations were used to evaluate these changes, and these evaluations determined that the changes are either risk neutral or risk beneficial.

Therefore, this change does not involve a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

Local Public Document Room location: Main Library, University of California, P.O. Box 19557, Irvine, California 92713

Attorney for licensee: T. E. Oubre, Esquire, Southern California Edison Company, P.O. Box 800, Rosemead, California 91770

NRC Project Director: William H. Bateman

Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, San Diego County, California

Date of amendment requests: November 6, 1995

Description of amendment requests: The licensee proposes to revise Technical Specification (TS) 3.5.1, "Safety Injection Tanks (SITs)," of the improved TS to extend, in general, the allowed outage time (AOT) for a single inoperable SIT from 1 hour to 24 hours. Additionally, the licensee proposes to extend the SIT AOT from 1 hour to 72 hours if a single SIT becomes inoperable due to malfunctioning SIT water level and/or nitrogen cover pressure instrumentation.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The Safety Injection Tanks (SITs) are passive components in the Emergency Core Cooling System (ECCS). The SITs are not accident initiators in any accident previously evaluated.

Therefore, this change does not involve an increase in the probability of an accident previously evaluated.

The SITs are designed to mitigate the consequences of Loss of Coolant Accidents (LOCAs). The proposed changes do not affect any of the assumptions used in deterministic LOCA analysis. Therefore, the consequences of accidents previously evaluated do not change.

To fully evaluate the SIT Allowed Outage Time (AOT) extension, Probabilistic Safety Analysis (PSA) methods were utilized. The results of these analyses show no significant increase in core damage frequency. As a result, there would be no significant increase in the consequences of an accident previously evaluated.

The proposed change pertaining to SIT inoperability based solely on instrumentation malfunction does not involve a significant increase in the consequences of an accident as evaluated and endorsed by the Nuclear Regulatory Commission (NRC) in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements."

Therefore, this change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed change does not change the design, configuration, or method of operation of the plant. Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed changes do not affect the limiting conditions for operation or their bases that are used in the deterministic analyses to establish the margin of safety. PSA evaluations were used to evaluate these changes. These evaluations demonstrate that the changes are either risk neutral or risk beneficial.

Therefore, this change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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NRC Project Director: William H. Bateman

Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, San Diego County, California

Date of amendment requests: November 8, 1995

Description of amendment requests: The licensee proposes to revise Technical Specification (TS) 3.5.2, "ECCS - Operating," in the improved TS to extend the allowed outage time from 72 hours to 7 days for a single low pressure safety injection (LPSI) train.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The Low Pressure Safety Injection (LPSI) system is a part of the Emergency Core Cooling System (ECCS). Inoperable LPSI components are not considered to be accident initiators. Therefore, this change does not involve an increase in the probability of an accident previously evaluated.

The LPSI system is primarily designed to mitigate the consequences of a large Loss of Coolant Accident (LOCA). This proposed change does not affect any of the assumptions used in the deterministic LOCA analysis. Therefore, the consequences of accidents previously evaluated do not change.

To fully evaluate the LPSI Allowed Outage Time (AOT) extension, Probabilistic Safety Analysis (PSA) methods were utilized. The results of these analyses show no significant increase in core damage frequency. As a result, there would be no significant increase in the consequences of an accident previously evaluated.

Therefore, this change does not involve a significant increase in the probability or consequences of any accident previously

evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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Federal Register Volume 61, Number 70 Page 15997//

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This proposed change does not change the design, configuration, or method of operation of the plant. Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed change does not affect the limiting conditions for operation or their bases that are used in the deterministic analyses to establish the margin of safety. PSA evaluations were used to evaluate these changes.

Therefore, this change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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NRC Project Director: William H. Bateman

Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, San Diego County, California

Date of amendment requests: December 6, 1995

Description of amendment requests: The licensee proposes to revise Technical Specification (TS) 4.3, "Fuel Storage," of the improved TS, to allow fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent to be stored in both the spent fuel racks and the new fuel racks.

Basis for proposed no significant hazards consideration

determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

There is no increase in the probability of an accident because the physical characteristics of a fuel assembly are not changed when fuel enrichment is increased. No changes will be made to any safety related equipment or systems. Fuel assembly movement will continue to be controlled by approved fuel handling procedures.

Fuel cycle designs will continue to be analyzed with Nuclear Regulatory Commission (NRC)-approved codes and methods to ensure the design bases for San Onofre Units 2 and 3 are satisfied.

The double contingency principle of American National Standards Institute/American Nuclear Society (ANSI/ANS) Standard 8.1-1983 can be applied to any postulated accident in the Spent Fuel Pool (SFP) which could cause reactivity to increase. In conjunction with administrative controls for heavy loads and impact zones, a boron concentration of 1850 parts per million (PPM) (the current Technical Specification (TS) limit) is sufficient to maintain k_{eff} less than or equal to 0.95 for all normal and postulated accident conditions.

Regarding the new fuel storage racks, there is no postulated accident which could cause reactivity to increase above 0.95 for all moderator densities from 0.0 to 1.0 grams/cubic centimeter (gms/cc).

The radiological consequence analyses performed in the Updated Final Safety Analysis Report (UFSAR) include the development of source terms which bound discharge fuel burnups to 60,000 megawatt days per ton (MWD/T). Increasing the San Onofre Units 2 and 3 enrichment to 4.8 weight percent (w/o) does not result in discharge fuel assembly burnups greater than 60,000 MWD/T. Thus, the consequences of the fuel handling accident are unchanged from the current UFSAR bases.

Therefore, this proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve any physical changes to the plant or any changes to the method in which the plant is operated. They do not affect the performance or qualification of safety related equipment. Fuel handling accidents were previously considered. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

3. The proposed change does not involve a significant reduction in a margin of safety.

For the SFP, the NRC acceptance criteria is k-eff less than or equal to 0.95 under all normal and accident conditions and including uncertainties. For the new fuel storage racks, k-eff must remain less than 0.95 if completely flooded with unborated water, and must remain below 0.98 in an optimum moderation event. Analyses have been performed which demonstrate that these acceptance criteria will continue to be met when the enrichment is increased to 4.8 w/o.

The current UFSAR design bases SFP decay heat loads bound the proposed enrichment increase due to the reduced fuel batch size.

Radiological effects of fuel handling accidents are unchanged by this enrichment increase.

The proposed design of the higher enriched fuel will result in a slight weight increase. However, the seismic event is bounded by the analyses performed for the rerack project.

Therefore, there will not be a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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NRC Project Director: William H. Bateman

Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, San Diego County, California

Date of amendment requests: January 4, 1996

Description of amendment requests: The licensee proposes to delete License Conditions 2.C(26) and 2.C(27). These license conditions require the licensee to implement and maintain a plan for scheduling all capital modifications based on an NRC approved Integrated Implementation Schedule Program Plan.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change deletes an administrative means of tracking and scheduling NRC required plant modifications and license commitments. It does not affect the plant configuration nor NRC mandated schedules for implementation of modifications. Because the deletion of the license condition does not affect the plant configuration, no accident analyses are affected; therefore, the proposed change does not increase the probability or consequences of any previously evaluated accident.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change will not alter the configuration of the plant or its operation; therefore, the proposed change does not create a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed change is administrative and does not affect any accident analyses or

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Federal Register Volume 61, Number 70 Page 15998//

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involve any modification to the plant configuration; therefore, the proposed change does not involve a reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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