

October 30, 1987

Docket Nos.: 50-361
and 50-362

Mr. Kenneth P. Baskin
Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

Mr. James C. Holcombe
Vice President - Power Supply
San Diego Gas & Electric Company
101 Ash Street
Post Office Box 1831
San Diego, California 92112

Gentlemen:

SUBJECT: ISSUANCE OF NOTICE OF DENIAL OF AMENDMENTS - SAN ONOFRE NUCLEAR
GENERATING STATION, UNITS 2 AND 3 (TAC NOS. 66003 AND 66004)

By letter dated July 31, 1987 (Reference PCN-236), Southern California Edison Company forwarded an application for amendments to the Technical Specifications (TS) for San Onofre Nuclear Generating Station, Units 2 and 3. The proposed change would revise TS 6.9.1.14, "Hazardous Cargo Traffic Report," by deleting the requirement to monitor and report the toxic gas cargo traffic on Interstate 5. The Notice of Consideration of Issuance of Amendments was published in the Federal Register on October 7, 1987 (52 FR 37553).

Proposed change PCN-236 was not approved, for the reasons given in the enclosed Safety Evaluation. Enclosed for your information is a copy of the related notice of denial, which has been forwarded to the Office of the Federal Register for publication.

Sincerely,

original signed by

Original signed by:
Harry Rood

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
Notice of Denial

cc: See next page

*See previous concurrence

DRSP/PDV*	DRSP/PDV*	OGC	DRSP/D:PDV*
JLee	HRood:cd		GWKnighton
10/23/87	10/23/87	10/30/87	10/23/87

Telephone concurrence from B. Vogler 10/30/87

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PDR ADDCK 05000361
P PDR

Mr. Kenneth P. Baskin
Southern California Edison Company

San Onofre Nuclear Generating
Station, Units 2 and 3

cc:

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Vice President - Power Supply
San Diego Gas & Electric Company
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Encinitas, California 92024

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Regional Administrator, Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane/Suite 210
Walnut Creek, California 94596

Mr. Dennis F. Kirsh
U.S. Nuclear Regulatory Commission
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Walnut Creek, California 94596

Resident Inspector, San Onofre NPS
c/o U. S. Nuclear Regulatory Commission
Post Office Box 4329
San Clemente, California 92672

Mr. Dennis M. Smith, Chief
Radiological Programs Division
Governor's Office of Emergency Services
2800 Meadowview Road
Sacramento, California 95832

Southern California Edison Company - 2 - San Onofre 2/3 (when specified)

cc:

California State Library
Government Publications Section
Library & Courts Building
Sacramento, CA 95841
ATTN: Ms. Mary Schnell

Mayor, City of San Clemente
San Clemente, CA 92672

Chairman, Board Supervisors
San Diego County
1600 Pacific Highway, Room 335
San Diego, CA 92101

California Department of Health
ATTN: Chief, Environmental
Radiation Control Unit
Radiological Health Section
714 P Street, Room 498
Sacramento, CA 95814

Mr. Joseph O. Ward, Chief
Radiological Health Branch
State Department of Health Services
714 P Street, Building #8
Sacramento, California 95814



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SOUTHERN CALIFORNIA EDISON COMPANY
DOCKET NOS. 50-361 AND 50-362

In an attachment to a letter dated July 31, 1987, Southern California Edison Company, the licensee, submitted a proposal Technical Specification (TS) change regarding the requirement to survey periodically (every three years) the hazardous cargo traffic on Interstate 5 (I-5) near San Onofre Nuclear Generating Station (SONGS), Units 2 & 3. Specifically, in a proposed change to the Operating Licenses NPF-10 and NPF-15 (proposed change PCN-236), TS 6.9.1.14 would be revised to remove the requirement to monitor and report the toxic gas cargo traffic on I-5.

The proposed change is based on the licensee's analysis which was submitted as an enclosure to the above letter. The analysis is used to demonstrate that the expected mix of toxic substance spills (in terms of toxicity and quantity spilled) is relatively constant with time. Hence, the licensee concludes that there is no need for a TS which requires a periodic survey of the hazardous cargo traffic on I-5 near SONGS 2 & 3.

Our review of the licensee's analysis indicates that there is no sound basis for concluding that the commodity mix associated with the cargo traffic on I-5 can be expected to be constant for the duration of the facility license. Specifically, there is no apparent evidence that toxic substance spill data averaged over the entire United States is applicable to projecting what might happen on I-5, near SONGS 2 & 3. The licensee goes so far as to relate the national spill data with that of the State of California. Conceptually, this may be reasonable, inasmuch as there may be sufficient diversity in the geographical distribution of shipments within California so that it would be similar to nationally averaged conditions. However, we do not have any basis for perceiving a similar spill data correlation between the United States and the local traffic on I-5. The apparent constancy of nationally averaged spill data is understandable. Local shipment and accident variations are not observable when viewing the aggregate data for the nation. However, commodity shipments at a single point are expected to be subject to fluctuations which are not necessarily the same as the national average.

In view of the above, we do not find the proposed elimination of the TS requirement to be justifiable on the basis of the submitted analysis. We believe that the requisite data should be obtained in the forthcoming traffic survey. We note, however, that the data to be obtained, in conjunction with the previous data obtained with respect to the I-5 cargo traffic, may provide a meaningful basis for projecting the expected spill rates near the facility.

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P PDR

UNITED STATES NUCLEAR REGULATORY COMMISSION
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.
DOCKET NO. 50-361 AND 50-362
NOTICE OF DENIAL OF AMENDMENTS TO
FACILITY OPERATING LICENSES AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) has denied a request by the licensees for an amendment to Facility Operating License Nos. NPF-10 and NPF-15, issued to the Southern California Edison Company, San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California for operation of the San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 & 3) in San Diego County, California. The notice of Consideration of Issuance of Amendments was published in the Federal Register on October 7, 1987 (52 F.R. 37553).

The amendments, as proposed by the licensees, would change the Unit 2 and 3 Technical Specifications (TS) by deleting the requirement to monitor and report the toxic gas cargo traffic on Interstate 5 (I-5). The requirement to monitor and report explosive and flammability hazard cargo on I-5 and hazardous cargo traffic on the AT & SF railway would remain in effect. The licensees contend that the nearby traffic of hazardous cargo on I-5 is sufficiently low so that the risk of control room operator incapacitation is acceptably low. Furthermore, the licensees state that the same traffic is likely to remain unchanged for the duration of their facility licenses.

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Hence, they propose that the need for periodic surveying of the traffic is unnecessary. The NRC staff has reviewed the licensees' risk assessment and finds that there is no basis for expecting that the hazardous cargo traffic on I-5 near SONGS 2 & 3 will remain unchanged for the duration of the facilities' licenses. The licensees' conclusions are based primarily on the application of nationally averaged spill data to the description of potential spills near SONGS 2 & 3. Nationally averaged data intrinsically are insensitive to local variations. The risk at SONGS 2 & 3 is derived from local potential events (i.e., spills within a few miles of the plant). Hence, in the absence of supporting data, we conclude that there is no basis for the proposed TS elimination. Therefore, the proposed Technical Specification change is not acceptable.

By December 8, 1987 the licensees may demand a hearing with respect to the denial described above and any person whose interest may be affected by this proceeding may file a written petition for leave to intervene.

A request for a hearing or petition for leave to intervene must be filed with the Secretary for the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., by the above date.

A copy of any petitions should also be sent to the Executive Legal Director, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and to Charles R. Kocher, Esq., Southern California Edison Company, 2244 Walnut Grove Avenue, P.O. Box 800, Rosemead, California 91770 and Orrick, Herrington and Sutcliffe, Attention: David R. Pigott, Esq., 600 Montgomery Street, San Francisco, California 94111, attorney for the licensees.

For further details with respect to this action, see (1) the application for amendments dated July 31, 1987, and (2) the Commission's Safety Evaluation forwarded to the licensees by letter dated October 30, 1987, which are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the General Library, University of California at Irvine, Irvine, California 92713. A copy of Item (2) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Reactor Projects - III, IV, V and Special Projects.

Dated at Bethesda, Maryland, this 30th day of October, 1987.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script that reads "Harry Rood".

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

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Docket File

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