

RULES AND DIRECTIVES
BRANCH
USNRC

As of: May 14, 2013
Received: May 09, 2013
Status: Pending_Post
Tracking No. 1jx-858m-118z
Comments Due: May 16, 2013
Submission Type: Web

PUBLIC SUBMISSION 2013 MAY 14 PM 3: 17

RECEIVED

Docket: NRC-2013-0070
Application and Amendment to Facility Operating License Involving Proposed No Significant Hazards Consideration Determination

Comment On: NRC-2013-0070-0001
Application and Amendment to Facility Operating License Involving Proposed No Significant Hazards Consideration Determination; San Onofre Nuclear Generating Station, Unit 2

Document: NRC-2013-0070-DRAFT-0036
Comment on FR Doc # 2013-08888

Submitter Information

Name: Pablo Orozco
Address: CA

4/16/2013
78 FR 22576

General Comment

120

Docket Number: NRC-2013-0070

Pablo Orozco

To: Nuclear Regulatory Agency

RE-Opposition to Proposed License Amendment and No Signification Hazards Consideration Determination for Operation of San Onofre Crippled Steam Generators Without Repair or Replacement

I write regarding the San Onofre's proposed license amendment for Southern California Edison (SCE) to allow it to operate of SONGS Unit 2 with damaged steam generators that do not meet the safety requirements in its existing Technical Specifications. SCE asks that this amendment be granted, and on a no significant hazard consideration basis which would permit granting the amendment and holding the safety hearing after the fact, when it could make no difference. However this is an irresponsible decision to make, considering that there are nearly 1,600 tubes with damage and nearly 5,000 indications of wear, orders of magnitude more than in typical new steam generators. With the status of SONGS Unit 2, this makes the reactor even more vulnerable to leaking radioactivity, exposing 8.5 million people within a radius of 50 miles.

In the San Onofre license amendment request document, the assertion is made that:
"The proposed change to reduce the power level will not affect the probability of any accident initiators because the only effect on plant operations is to lower the allowable power level."

*SONSI Review Complete
Template = ADM-013*

*E-RIDS = ADM-03
Call = B. Benney (b5b)*

However, the proposal to reduce SONGS Unit 2 to 70% power indicates that it is not able to run at 100% for any extended period. Therefore, rather than fixing the damaged steam generators, SCE proposes eliminating that safety requirement. This clearly would reduce a safety margin, one of the standards that bars a no significant hazards consideration.

Additionally, removing that safety requirement in the Tech Specs so that the damaged steam generators can be allowed to run without repairing them will increase the likelihood of an accident and would permit a type of accident not analyzed in the Final Safety Analysis Re