• •, •										4
	REGUL	ATORY	EOR	MATION	DISTRIBU	TION	SY M	(RIDS	3) (Pr
ACCESSIO	N. NBR: 8401030	275	ົວດດ.	DATE:	83/12/29	NOTAP	RTZED:	NO		DOCKET #
FACIL	0=361 San Ono	fre N	ucliear	Stati	on, Unit	2. 50	thern	Galii	orn	05000361
.5	0=362 San Ono	fre N	uclear	Stati	on, Unit	3, 50	thern	Cali	forn	05000362
AUTH N	AME AU	THOR "	AFFILI	ATION		*			-	· · · · · ·
MEDFORD	, M.O. Sou	thểrn	Calif	ornia	Edison Co.)				
RECIP.	NAME RE	CIPIE	NT AFF	ILIATI	ON					
KNIGHTO	N,G.W.	Licen	sing B	ranch	3.					
SUBJECT	: Eorwands në	sponsi	estoaT	Chand	rasekaran	comme	ents of	neproc	ess	
sign more a set of	control pro	gram,	/Rev	0 to H	ealth Phys	sics	roced	ure	* ÷	
	S023-VII-8.	5.1,	Proce	ss Con	trol Progi	ram fo	or San	Onofr	'ė ^s	
	Units 2.8 3	erz −	· ·				• •	*		00
DIOTOTO	TTON CODES O	A A 40 A0	CONTE		TUPNALER	1. mar	. 1	0.776-	6.	- Uh
TITLE	UTION CUDE: B	0015	CUP1E	S RELL	LVEDILIK .	ENU		512E:		
	Licensing Jub	matcar	II POA	KALONK	ANOUSSA	ve l'a u		respon	Idenci	
NOTESIJ	Hanchett icv	PDR) o c ume	ntes. F		an icv				05000361
J.	Hanchett 1cv	PDR)ocume	ntsse	LD Chandle	er lcv	(***) /255	•		05000362
÷					•	-,• ,	•			
	PECTOTENT	•		0:	050101					
· ·		c ,	UVPIC UTTO	5° Enici	TOCODE		· · · ·	CUPIE	S	
	NPRIDI ZADI	5 .4	SER PRC			IZ IVAME I Do		216 P17 - 20 - 4		
	NRR LAZ LA		1.	νV. 	POOD U		γ Δ Γ ,	1.	Y.	
			· * # *	V	NUUU/II.		.01	7	↓ [*]	
INTERNAL:	ELD/HDS2	•	. 1	× 0	IE FILE			. 1.	.1.	
κτ	IE/DEPER/EPB	36	131	×3+	IE/DEPER	R/IRB.	35	. 1	1.14	,
	IE/DEQA/QAB	21	.1.	. 1	NRR/DE/A	AEAB	à,	. 1 -	0	
	NRR/DE/CEB	11	, 1 s	. 1 -	NRR/DE/E	EHEB		. 1 /	1	
	NRR/DE/EQB	13	2:	. 2	NRR/DE/C	SB .	28	~2	2	
	NRR/DE/MEB	:18.	· 1 *	. 1 *	NRR/DE/M	1TEB	17:	. 1 -	. 1 -	
	NRR/DE/SAB	24	- 1 -	1.	NRR/DE/S	GEB	25	. 1 €	- 1 -	
	NRR/DHFS/HEE	340.	- 1 -	- 1 -	NRR/DHFS	S/LQB	32	- E 1 -	1	
	NKKZDHFSZPSRI	3	. 1 -	5 1 <	NRR/DL/S	SPB		: 1 ·	0	
	NRR/USI/AEB	20	1 -4	- 1 ×	NRR/DSI/	ASB		- 1 -	1	
	NER/USI/UFD	10.	.) ~	. 1 .	NRR7US17		0.9	- 1 ·	1	
	NOD VIGT / DOD	10	s ↓ 4	. 1 »	NRR/USI/	MEND.	12	. 1	~ 1 <	
	NPRIDGTIPSB	> # 7 ° 7 つな。		* 11 ⁴	DEC ETTE	RAD	62	- 1. -	1 14 	i
	RGN5		* * * * X /	- ∆ ` ∳ ℃ .	DW/IIIAMI	MIR	V. M	• # ·		•
· •	n en sen en e			، جي ۽	OUN DOWNT	с. м. т. ф		- A '	V,	
EXTERNAL:	ACRS	41=	2 6 .	×6°	BNL (AMDT	S ONL	¥)	. 1 -	. 1	
an 1977 - Ali I	DMB/DSS (AMD	rsj	. 1.5	1.	FEMA-REP	P DIV	39	.1	1	
	LPDR	03	1 =	21 C	NRC PDR		02	1	1 -	
	NSIC	- 0.5	- 1 *	а 1 с.	NTIS		•	. 1 -	- 1 /	
NOTES.	· .		D .	· 3 ·	· · ·					
			6	۲.						

1

TOTAL NUMBER OF COPIES REQUIRED: LITTR

55 ENCL: 48

Southern California Edison Company

P. O. BOX 800 2244 WALNUT GROVE AVENUE ROSEMEAD, CALIFORNIA 91770

M.O. MEDFORD MANAGER, NUCLEAR LICENSING

December 29, 1983

TELEPHONE (213) 572-1749

Director, Office of Nuclear Reactor Regulation Attention: Mr. George W. Knighton, Branch Chief Licensing Branch No. 3 U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362 San Onofre Nuclear Generating Station, Units 2&3

Technical Specification 6.13.1 for San Onofre Nuclear Generating Station, Units 2&3 (SONGS 2&3) requires Nuclear Regulatory Commission (NRC) approval of the Process Control Program (PCP) prior to shipment of "wet" solid radioactive waste. Southern California Edison Company (SCE) submitted the PCP for SONGS 2&3 to the NRC in November 1981, and submitted the Chem-Nuclear Inc., Topical Report in January 1982. In June 1982, SCE responded by letter to NRC questions regarding the PCP.

Early in 1983, the staff was preparing its Safety Evaluation Report on the Topical Report, based on a Technical Evaluation Report completed by EG&G - Idaho for the NRC. It was reported to SCE by Mr. T. Chandrasekaran of the NRC that the SCE submittals were technically acceptable. However, Mr. Chandrasekaran submitted several additional comments to SCE which needed to be addressed before the NRC could approve the PCP.

The purpose of this letter is to provide SCE's responses (enclosed) to Mr. Chandrasekaran's comments. With this submittal, SCE requests prompt NRC approval of the PCP for SONGS 2&3.

If you have any questions, please call me.

Sincerely, Russell W Kriegen for M. O. Medford

3001

Enclosure

cc: H. Rood - NRC

8401030275 831229 PDR ADDCK 05000361 Responses to Effluent Treatment Systems Branch Comments on Process Control Program for San Onofre, Units 2 and 3

> San Onofre Nuclear Generating Station Units 2 and 3 Docket Numbers 50-361 and 50-362

Comment 1

' ač

The PCP for San Onofre Nuclear Generating Station, Units 2 and 3, should be updated to be consistent with Reference 4.

Response

The Process Control Program currently under review by Station personnel (S023-VII-8.5.1) has been updated to be consistent with the CNSI Topical Report (CNSI-2, 4313-01354-0IP, January 1983, Revision 2). The figures for processing particular waste types and the solidification worksheets have been updated to be consistent with the most recent revision of the CNSI Process Control Program for cement solidification units, (CNSI Procedure SD-OP-003 Rev. M) and will continue to be updated as required to reflect changes in cement solidification chemistry. Reference: Health Physics Procedure S023-VII-8.5.1, Section 2.0, steps 2.28 and 2.30

Comment 2

The PCP for San Onofre, Unit Nos. 2 and 3, should explicitly state that it is the PCP for San Onofre, Unit Nos. 2 and 3, on the cover page, as well as in the body of the PCP write up. If the licensee elects to utilize the generic write up of the PCP for CNSI Cement Solidification System for San Onofre, Unit Nos. 2 and 3, the licensee can do so provided it is tailored to San Onofre, as appropriate (the current submittal, i.e., Reference 1 contains only the generic PCP, Revision 0 version).

Response

The title of SO23-VII-8.5.1 is "Process Control Program for San Onofre Unit 2 and Unit 3." We have utilized the generic write up of the PCP for CNSI cement solidification units as a base document. From that we have expanded the PCP to meet all the requirements of the San Onofre Unit 2 and Unit 3 Technical Specifications, Health Physic Program, Quality Assurance Program, and ALARA Program. Reference: Health Physics Procedure SO23-VII-8.5.1 "Process Control Program for San Onofre Unit 2 and Unit 3.

Comment 3

The following wording is suggested for subsection 1.1, "Purpose."

"The purpose of the Process Control Program for San Onofre, Unit Nos. 2 and 3, is to establish a set of process parameters which provide reasonable assurance of complete solidification of various liquid radioactive "wet wastes" including resin slurries, evaporator bottoms, and filter sludges, in accordance with applicable Department of Transportation (DOT) and California State Regulation and Nuclear Regulatory Commission (NRC) and licensed burial facility's acceptance criteria for packaging and shipment to an approved offsite burial site.

<u>Comment 3</u> (Continued)

Response

The following wording has been incorporated into SO23-VII-8.5.1 Process Control Program for San Onofre Unit 2 and Unit 3" Section 1.0 "Objective" step 1.1.

The purpose of the Process Control Program for San Onofre, Unit Nos. 2 and 3, is to establish a set of process parameters which provide reasonable assurance of complete solidification of various liquid radioactive "wet wastes" including resin slurries, evaporator bottoms, and filter sludges, in accordance with applicable Department of Transportation (DOT) and California State Regulation and Nuclear Regulatory Commission (NRC) and licensed burial Facility's Acceptance Criteria for packaging and shipment to an approved offsite burial site.

Comment 4

Under Section 2.0, "Reference," of your PCP, include the following additional entries:

- a. Applicable chapters of the Final Safety Analysis Report for San Onofre, Unit Nos. 2 and 3, (spell out these chapter numbers).
- b. Southern California Edison Company's ALARA plan for San Onofre, Unit Nos. 2 and 3.
- c. San Onofre Quality Assurance Program applicable to PCP.
- d. Standard Review Plan 11.4, Revision 2, July 1981, "Solid Waste Management Systems."
- e. San Onofre, Unit Nos. 2 and 3, Technical Specifications applicable to PCP (spell out the Technical Specification number).
- f. Spell out the specific document identification number for the CNSI Operating Procedure for Cement Solidification Units, which you are currently listing under Section 2.0.

Response

The reference section of SO23-VII-8.5.1, "Process Control Program for San Onofre Unit 2 and Unit 3" contains all the above information. Reference: Health Physics Procedure SO23-VII-8.5.1, Section 2.0, steps 2.1, 2.2, 2.4, 2.14, 2.15, and 2.25.

Comment 5

Provide commitment in the body of the write up of your PCP that you will implement the applicable interface requirements given in the CNSI topical report (Reference 4).

<u>Comment 5</u> (Continued)

Response

The interface requirements required for the CNSI cement solidification unit are provided and the requirements for implementation are clearly defined in S023-VII-8.5.1 PCP for San Onofre Unit 2 and Unit 3. Reference: Health Physics Procedure S023-VII-8.5.1, Section 6.0, steps 6.1.3.2.2

Comment 6

Integrate the information that you have provided in Reference 3 to the staff questions on solidification of "wet wastes" in the body of the PCP write-up.

Response

The information provided, in memorandum date June 3, 1982 from the licensee to F. Miraglia of USNRC, has been incorporated in to the PCP for San Onofre Unit 2 and Unit 3 (S023-VII-8.5.1). Reference: Health Physics Procedure S023-VII-8.5.1, Section 2.0, step 2.29 and Section 6.0, step 6.1.3.3

Comment 7

State explicitly that the PCP will comply with applicable DOT regulations, state regulations, NRC and burial facility acceptance criteria, and 10 CFR Part 61 for packaging and shipment to an approved offsite burial site. Also, make it clear that the implementation of the PCP for solidification of the "wet wastes" will be in accordance with applicable portions of (a) 10 CFR Part 50, Appendix I; (b) San Onofre, Unit Nos. 2 and 3, Quality Assurance Program; and (c) Southern California Edison Company's ALARA plan for San Onofre, Unit Nos. 2 and 3.

Response

The PCP for San Onofre Unit 2 and Unit 3 (SO23-VII-8.5.1) will comply with applicable shipping and packaging regulations. The entire document has been written to comply with the applicable portions of 10 CFR Part 50, Appendix I; San Onofre Unit 2 and Unit 3 Quality Assurance Programs, as demonstrated by Quality Control hold points in the appropriate areas of the PCP; San Onofre Unit 2 and Unit 3 ALARA programs. Reference: Health Physics Procedure SO23-VII-8.5.1, Section 2.0, steps 2.1, 2.2, 2.20, Section 3.0, step 3.7, 3.8, Section 6.0, step 6.3.1, 6.1.8

Comment 8

Section 3.4 of your PCP should discuss the process or steps you would follow for dewatering the resins, if applicable. It should also spell out the candidate tanks applicable to Unit Nos. 2 and 3, the contents of which will be solidified using the CNSI solidification program.



Comment 8 (Continued)

Response

The process for dewatering resin in preparation for solidification and the candidate tanks which will be processed by the CNSI cement solidification unit are incorporated into the body of the PCP for San Onofre Unit 2 and Unit 3 (S023-VII-8.5.1). Reference: Health Physics Procedure S023-VII-8.5.1, Section 6.0, step 6.1.4.4, 6.1.4.5

Comment 9

Your list of equipment required for testing samples should be consistent with the equipment listed for the above purpose given in CNSI Topical Report, Revision 1 (note that your current submittal does not include some of the equipment).

Response

The equipment list, Attachment 8.1 of SO23-VII-8.5.1 Process Control Program for San Onofre Unit 2 and Unit 3, has been updated to be consistent with CNSI Topical Report Revision 2, and CNSI Procedure SD-OP-OO3 "CNSI PCP for cement solidification units" Revision M.

Comment 10

Provide worksheets for (a) sample solidification, and (b) full scale solidification. Also, provide process summary worksheets. If these are consistent with CNSI Cement Solidification Topical Report, reference to Reference 4, with respect to these worksheets, will be sufficient.

Response

Worksheets for sample solidification, full scale solidification, and process summary are being revised to ensure they are up-to-date for all types of waste (Attachments 8.2, 8.3, 8.4, 8.5, and 8.8 of SO23-VII-8.5.1). Also Attachment 8.7 "SCE Solidification Verification Worksheet" of SO23-VII-8.5.1 PCP for San Onofre Unit 2 and Unit 3.

0583F