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## Southern California Edison Company



P.O. BOX 800 2244 WALNUT GROVE AVENUE ROSEMEAD, CALIFORNIA 91770 April 19, 1984

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:

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

The purpose of this letter is to document the results of a meeting between Southern California Edison Company (SCE) and the Nuclear Regulatory Commission staff (NRC) in Bethesda, Maryland on April 13, 1984. The meeting was held at the request of SCE to resolve outstanding NRC questions to clear the way for NRC approval of the waste solidification Process Control Program as required by License Conditions 2.C.(16) of NPF-10 and 2.C.(14) of NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3), respectively.

At the meeting the following documents were presented:

- 1) Station approved SONGS Health Physics Procedures:
  - a) S0123-VII-8.1, Rev. 4, "Solid Radioactive Waste Packaging, Labeling and Shipping."
  - b) S0123-VII-8.5, Rev. 2, "Radwaste Solidification Procedure" including Temporary Change Notice No. 2.1.
  - c) S023-VII-8.5.1, Rev. 1, "Process Control Program for San Onofre Unit 2 and Unit 3."
  - d) S0123-VII-8.15, Rev. 0, "10 CFR 61 Waste Sampling Program."
- 2) Correlation Factors for SONGS 1 and for SONGS 2 and 3.
- 3) SONGS 1, 2 and 3 Analysis Results, 1984.

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## Mr. G. Knighton

As requested by the NRC staff, SCE agreed to modify Health Physics Procedure S023-VII-8.5.1, Rev. 1, "Process Control Program for San Onofre Unit 2 and Unit 3" before the first shipment offsite of radioactive waste to specifically state that the Process Control Program complies with 10 CFR 20.311 requirements for shipment and disposal. In addition, NRC questioned whether SCE was reserving the option of using either the previously established correlation factors or the latest actual offsite analysis results for waste classification. It was pointed out that Health Physics Procedure S0123-VII-8.15, Rev. 0, "10 CFR 61 Waste Sampling Program" does not provide that option as illustrated, for example, in Step 6.2.1.2.3, which makes clear that the correlation factors are based on the latest offsite analysis results.

Based upon discussions and agreements reached at the meeting. SCE intends to commence solidification of Class B "wet" radioactive waste the week of April 16, 1984. It is expected that it will requires 3 to 4 weeks to complete solidification of spent resins presently stored in Tank Nos. T059 and T060. The solidified waste will be stored on site pending NRC interim approval of the waste solidification Process Control Program. Thereafter, the waste will be shipped once the requirements of Health Physics Procedure S0123-VII-8.1, Rev. 4, "Solid Radioactive Waste Packaging, Labeling and Shipping" have been satisfied.

It you have any further questions regarding this matter, please call.

Very truly yours,

M.D. Medford

M. O. Medford Manager, Nuclear Licensing

cc: H. Rood, NRR