

Southern California Edison Company



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October 27, 1983

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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. 50-206, 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 1, 2 and 3

Southern California Edison Company's (SCE's) letters dated February 11, 1983 and August 9, 1983 submitted a proposed "Physical Security Plan, San Onofre Units 1, 2 and 3" in accordance with 10 CFR 50.90. In the August 9, 1983 submittal SCE responded to NRC staff comments and made several additional minor changes to the February 11, 1983 original submittal. In order to complete the application for amendment to the licenses for San Onofre Units 1, 2 and 3, a safety analysis is provided as an enclosure to this letter. SCE has determined that the proposed Physical Security Plan does not involve a significant hazards consideration as defined by 10 CFR 50.92.

In the August 18, 1983 NRC letter to SCE, the NRC stated that for the revised "Physical Security Plan for San Onofre Units 1, 2 and 3" submitted by letter dated February 11, 1983, as a 10 CFR 50.90 application for amendment of license, that a Class III and two Class I license amendment fees (\$4,800) are appropriate since the NRC review involves consideration of a single safeguards issue and requires two duplicate license amendments. As a Class II fee (\$1,200) was remitted when the plan was first submitted, the NRC requested that SCE remit the additional sum of \$3,600. SCE has reevaluated the fees appropriate for this revised security plan in accordance with 10 CFR 170.22 and agrees with the NRC determination with the understanding that \$4,800 is the total fee for processing the February 11, 1983 and August 9, 1983 10 CFR 50.90 submittals as one application for amendment to the licenses for San Onofre Units 1, 2 and 3. It is also understood that no additional fees are required for the 10 CFR 50.54(p) change, Revision 1 to the proposed August 9, 1983 Security Plan, which was submitted to the NRC by letter dated September 29, 1983.

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Accordingly, enclosed is a check in the amount of the requested \$3,600 for the balance of the Class III and two Class I license amendment application fees.

If you have any questions or would like additional information, please let me know.

Very truly yours,

M. D. Medford

cc: H. Rood (NRC - To be opened by addressee only)
M. D. Schuster (NRC, Region V)
J. O. Ward (State of California)
W. Paulson (NRC - To be opened by addressee only)

DESCRIPTION OF PROPOSED CHANGE TO FACILITY LICENSES
DPR-13 (UNIT 1), NPF-10 (UNIT 2), AND NPF-15 (UNIT 3)
AND SAFETY ANALYSIS

This is a request to revise the "Physical Security Plan, San Onofre Units 1, 2 and 3."

DESCRIPTION

This proposed change, a revision to the Physical Security Plan, is written in the format of and to meet the intent of NUREG-0908: "Acceptance Criteria for the Evaluation of Nuclear Power Reactor Security Plans," July 1982 and to provide for more efficient security operations to comply with 10 CFR 73.55. This proposed change, which is a major revision of the March 1981 Security Plan (with revisions), is submitted as an application for amendment to the license pursuant to 10 CFR 50.90 in accordance with the requirement in 10 CFR 50.54(p).

EXISTING SECURITY PLAN

The existing "Physical Security Plan, San Onofre Units 1, 2 and 3" dated March 1981 including Revisions 1 through 11 is "Safeguards Information" as specified in 10 CFR Section 73.21 and is, therefore, withheld from public disclosure. This March 1981 Security Plan was submitted to the NRC by letter dated March 9, 1981, and the 11 revisions were submitted by letters dated July 22, 1981, November 30, 1981, December 30, 1981, January 25, 1982, June 30, 1982, August 18, 1982, October 15, 1982, December 21, 1982, March 23, 1983, July 21, 1983 and September 29, 1983.

PROPOSED PHYSICAL SECURITY PLAN

The proposed "Physical Security Plan, San Onofre Units 1, 2 and 3" dated August 1983 is "Safeguards Information" as specified in 10 CFR Section 73.21 and is, therefore, withheld from public disclosure. This August 1983 Physical Security Plan was originally submitted to the NRC as a 10 CFR 50.90 license amendment request by letter dated February 11, 1983 (January 1983 Security Plan) and was resubmitted to the NRC by letter dated August 9, 1983. The NRC staff commented on the original January 1983 Security Plan, and SCE responded to the NRC staff comments and made several additional minor changes to the January 1983 Security Plan in the August 1983 Security Plan. A 10 CFR 50.54(p) change, Revision 1 to this proposed August 9, 1983 Security Plan, which does not decrease the safeguards effectiveness of the proposed plan, was submitted to the NRC by letter dated September 29, 1983.

The most significant changes proposed in the new Physical Security Plan are the following:

1. Completely revised old plan using the format of NUREG-0908 which eliminated much of the redundancy and extraneous detail.
2. Provided for a single protected area by eliminating the access control point between Unit 1 and Units 2 and 3.

3. Redefined the duties of the guardtower security officers.
4. Changed requalification time 73.55(b)(4) from 6 months to 12 months as required by current NRC regulations.
5. Specified in detail requirements for package search 73.55(d)(3).
6. Moved certain details of security training program and equipment to site procedures. Revised the security procedures management system.
7. Decreased key inventory frequency to annual basis (still within NRC acceptance criteria).
8. Reduced Protected Areas and Protected Area barrier patrols frequency by a half (frequency still within NRC acceptance criteria).
9. Deleted reference to GSA specification WA00450B and added a description of alarm system line supervision.
10. Added specific compensatory security posts at failed or by-passed intrusion detection zones.
11. Modified search procedures.
12. Restructured lists of vital and non-vital equipment.
13. Added a commitment regarding central alarm station operator duties.
14. Provided additional details regarding audits.

SAFETY ANALYSIS

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change affects only the Physical Security Plan and is not related to any accident previously evaluated. Generally, this change makes the licenses conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. Although the frequency of key inventory, Protected Area and Protected Area Barrier patrols, etc. have been decreased, the reductions are clearly within all NRC acceptance criteria, and this comprehensive change, applied in its entirety, results in a more effective security program which does not decrease safeguards effectiveness.

2. Will operation of the facility in accordance with this proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change to the Physical Security Plan does not alter any safety related design bases of the facility or its operation. It therefore does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change to the Physical Security Plan does not affect any margin of safety.

SAFETY AND SIGNIFICANT HAZARDS DETERMINATION

Based on the Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Environmental Statement.