

January 16, 1997

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Subject: **Docket Nos. 50-206, 50-361, and 50-362**  
**Revision 6.5 to the Site Emergency Plan San Onofre Nuclear**  
**Generating Station Units 1, 2, and 3**

This letter transmits Revision 6.5 to the Emergency Plan for the San Onofre Nuclear Generating Station (SONGS). Revision 6.5 makes the following changes to the Emergency Plan:

- 1) Removes the letter of agreement with General Atomics (GA) since GA has closed their laboratory. GA was the offsite laboratory for confirmation or backup accident assessment. Primary assessment is still performed by onsite laboratories.
- 2) Provides an updated letter of agreement with INPO for emergency assistance, and
- 3) Removes the letter of agreement with Westinghouse (Unit 1 nuclear steam supply system vendor) because there is no longer any fuel in the Unit 1 reactor vessel.

Administrative changes are also included. A description of the changes is provided in Enclosure 1. The specific Emergency Plan changes are provided in Enclosure 2.

This Emergency Plan revision became effective on December 20, 1996. Replacement pages for the SONGS Emergency Plan have been sent to the book holders of record by separate letter.

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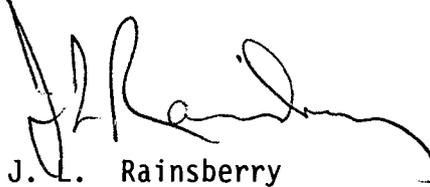
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If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "J. L. Rainsberry". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

J. L. Rainsberry  
Manager, Plant Licensing

Enclosures

cc: L. J. Callan, Regional Administrator, NRC Region IV  
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

## ENCLOSURE 1

### SUMMARY OF CHANGES TO THE SAN ONOFRE NUCLEAR GENERATING STATION EMERGENCY PLAN

#### **Removal of the General Atomics laboratory services agreement from Appendix A:**

General Atomics/International Services Corporation in San Diego, California has closed their laboratory. Therefore, the General Atomics letter of agreement in Appendix A is being deleted and text within the Emergency Plan is being revised to allow transportation of environmental samples to any offsite vendor, academic facility, or other nuclear utility equipped to conduct appropriate laboratory analysis. The example response times from GA are being deleted (Emergency Plan section 7.3.1.4).

NUREG-0654 section H.6.c states that the licensee is to have access to laboratory facilities, fixed or mobile, for environmental monitoring. Edison meets this statement by maintaining onsite laboratory analysis. Since Edison has onsite laboratories, any provision to utilize offsite laboratories exceeds the regulatory guidance. The offsite laboratory will be used for confirmation purposes or as a backup to the onsite laboratory. Protective action recommendations for the public post plume phase are based upon field readings and onsite isotopic count analysis results. Therefore, results from General Atomics, or any other offsite laboratory, provide an independent confirmation for historical purposes. While General Atomics was relatively close, the time to transport samples to other offsite laboratories is still acceptable for purposes of backup analysis.

The General Atomics agreement was only applicable during drills or an actual event. Edison maintains purchase orders with offsite laboratories for analysis of environmental and onsite samples as a matter of day-to-day operations. As an alternative to maintaining an agreement with a laboratory solely for confirmation of onsite analysis during drills and emergencies, Edison will utilize the existing contracts which are used routinely for plant operation. Currently these arrangements are with Thermo-NUtech (Richmond, California) and Yankee Atomic Environmental Laboratory (Bolton, Massachusetts). Samples which require shipping in accordance with 49CFR can be sent to Thermo-NUtech; otherwise, the samples may be sent to Yankee Atomic Environmental Laboratory.

ENCLOSURE 1: SUMMARY OF CHANGES TO THE SONGS EMERGENCY PLAN (continued)

Edison maintains contracts with offsite facilities in order to satisfy the radiological environmental sample requirements of the SONGS Units 2&3 Offsite Dose Calculation Manual and the detection capabilities needed to comply with 10CFR61. The detection requirements for 10CFR61 are more extensive than those necessary for accident assessment. Edison has the capability to perform accident assessment analysis onsite, but does not have onsite capability to analyze the full range of 10CFR61 requirements.

Relying on facilities that routinely perform radiological analysis will increase the assurance that the laboratory has the analysis capability needed to assess the public radiological hazard in the event of an actual emergency. Onsite analysis capabilities will remain unaffected by this change. Therefore, the deletion of the GA agreement does not decrease the effectiveness of the plan.

**Update Appendix B (INPO letter of agreement):**

The letter certifying that the agreement with INPO for emergency services remains in effect (Appendix B) is being replaced with the most recent version. Only the certification letter is being included. As a matter of practice SONGS has attached sections from the INPO Emergency Resources Manual (INPO 86-032) to the letter from INPO prior to inclusion into the Emergency Plan for completeness. Although the letter from INPO references the Emergency Resources Manual, it does not include pages from the manual. Inclusion of pages from the Emergency Resources Manual creates unnecessary administrative burden in that the Emergency Resources Manual is updated on a different schedule than the certification letter therein inherently making one part or the other out of place. A copy of the Emergency Resources Manual is provided in the Emergency Operations Facility and Headquarters Support Center so reliance on including sections of this document in the Emergency Plan is unnecessary.

The replacement certification letter is equivalent to the previous certification letter; therefore the effectiveness of the plan is unchanged.

ENCLOSURE 1: SUMMARY OF CHANGES TO THE SONGS EMERGENCY PLAN (continued)

**Removal of Appendix C (Westinghouse letter of agreement):**

The Unit 1 nuclear steam supply system (NSSS) was designed and built by the Westinghouse Corporation. Appendix C provided an agreement with Westinghouse Corporation to supplement emergency response.

Unit 1 ceased power operation in the fourth quarter of 1992 and all reactor fuel has been removed from the reactor core. Radiological accidents at Unit 1 could only emanate from fuel handling or spent fuel building accidents. Offsite support assistance in response to a fuel handling or fuel building accident can be obtained through the agreement with INPO. Since there is no longer fuel within the NSSS, the agreement with the vendor of the system is no longer necessary. Additional changes to text within the main body of the Emergency Plan have been made consistent with the removal of the Westinghouse letter of agreement.

Appendix C of the Emergency Plan was in place to support emergency response by providing vendor expertise on Unit 1's NSSS. Edison has removed fuel from the Unit 1 NSSS; therefore removal of this agreement does not decrease the effectiveness of the plan.

**Section 7.1.4 change:**

Section 7.1.4 describes facilities at the Emergency Operations Facility. This section is being clarified to state that the Offsite Dose Assessment Center (ODAC) coordinates plume pathway samples. Previously this section stated that ODAC is a primary center for coordination of Ingestion Pathway Sampling. Although ODAC collects and analyzes the majority of plume pathway samples, they are not the lead agency for collection of samples within the ingestion pathway. Plume pathway sample results are used by ODAC to provide technical support to the off-site jurisdictions during the plume phase.

With respect to the ingestion pathway samples, the Regional Emergency Operations Center (REOC) at Los Alamitos collects the majority of the environmental samples. Results of these environmental samples are forwarded to a third agency called the State Ingestion Pathway - Recovery Advisory Committee (IPRAC). As described on page 360 of 592 of the State of California Emergency Response Plan, the IPRAC makes protective action recommendations to the governmental agencies based on the deposition results.

ENCLOSURE 1: SUMMARY OF CHANGES TO THE SONGS EMERGENCY PLAN (continued)

**Section 7.1.6 change:**

Section 7.1.6 describes the Headquarters Support Center (HSC). The change to this section is administrative only. The HSC facility has not moved. The Southern California Edison (Edison) San Onofre personnel have moved from 23 Parker Street in Irvine, California to the site, and consequently the location is no longer referred to as the Nuclear Engineering, Safety and Licensing building.

**Section 7.2 change:**

Section 7.2 describes the locations of the offsite Emergency Operation Centers (EOCs) which are staffed 24 hours per day. The change to this section is being made to reflect the re-location of one of the EOCs to an equivalent location.

**Section 8.3 change:**

Section 8.3 describes maintenance, inventory, and inspection of emergency kits. Changes are being made for clarity and to remove items not relevant to the SONGS Emergency Plan. Although Edison provides plume survey kits to offsite agencies, it is not necessary to identify this arrangement in the Emergency Plan. The offsite agencies could obtain these kits from sources other than Edison. Calibration, inventory, and inspection of the offsite plume survey kits is performed by the offsite jurisdictions in accordance with Offsite Dose Assessment Center Surveillance Procedure (ODAC-3). It is not appropriate to identify details of the offsite emergency plan in the SONGS Emergency Plan.

Since maintenance of the offsite plume survey kits is coordinated by offsite organizations and since the offsite plume survey kits are not utilized by Edison during emergency response, their deletion from the SONGS Emergency Plan does not decrease the effectiveness of the SONGS Emergency Plan.

Administrative changes are incorporated in sections 5.0, 5.2.4, 5.3.3, and 7.1.7.

ENCLOSURE 2

AMENDED TEXT TO THE SONGS EMERGENCY PLAN