



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 78 TO PROVISIONAL OPERATING LICENSE NO. DPR-13  
AMENDMENT NO. 23 TO FACILITY OPERATING LICENSE NO. NPF-10  
AMENDMENT NO. 12 TO FACILITY OPERATING LICENSE NO. NPF-15  
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL  
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NOS. 1, 2, AND 3  
DOCKET NOS. 50-206/361/362

1.0 INTRODUCTION

Southern California Edison Company (SCE) (the licensee) filed with the Nuclear Regulatory Commission for the San Onofre Nuclear Generating Station (SONGS) Units 1, 2, and 3 a proposed amendment to their License Numbers DPR-13, NPF-10 and NPF-15, respectively. The amendments would approve the revision to the physical security plan entitled "San Onofre Nuclear Generating Station Physical Security Plan," dated December 1983 (transmitted by letter dated December 16, 1983) as updated by pages dated April 1984 (transmitted by letter dated April 2, 1984).

A Notice of Consideration of Issuance of Amendments to Licenses and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on May 23, 1984 (49 FR 21839). No request for hearing and no comments were received.

2.0 EVALUATION

Part 73 of 10 CFR specifies requirements for a physical protection system at fixed sites. Physical security systems shall be established and maintained by the licensee in accordance with security plans approved by the Nuclear Regulatory Commission.

By letters dated December 16, 1983 and April 2, 1984, SCE submitted for staff review and approval a revision to their physical security plan involving a major reconfiguration of the San Onofre vital area program.

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10 CFR 73.55 requires that vital equipment be located within a vital area <sup>1/</sup> which in turn must be located within a protected area. Licensees are to positively control access in the vital areas. Access is to be limited to individuals who are authorized access to vital equipment and who require such access to perform their duties. Vital areas that are normally unoccupied are required to be locked and protected by an intrusion alarm system. Guidance regarding the specific plant equipment to be protected as vital is contained in Review Guideline No. 17 (which directs the facility to Regulatory Guide 1.29); and NUREG-0992 <sup>2/</sup> which sets forth certain equipment that should be separately protected on a generic basis. Other than as shown in NUREG-0992, there are no requirements or guidance relative to the size of a vital area, compartmentalization of equipment, or interior controls. The licensee has complied with all current requirements and staff guidance regarding vital area identification and protection.

The licensee's proposed reconfiguration contains three major parts which in summary form includes:

- i. Consolidating several adjacent vital areas into a single vital area,
- ii. Reducing the size of several large vital areas by compression of the boundaries,
- iii. Moving certain equipment not required for plant safety outside of the vital boundary.

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<sup>1/</sup> A vital area means any area which contains vital equipment. Vital equipment means any equipment, system device or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation. Equipment or systems which would be required to function to protect public health and safety following such a failure, destruction, or release are also considered to be vital.

<sup>2/</sup> Report of the Committee to Review Safeguards Requirements at Power Reactors, May 1983. (Also known as the Safety/Safeguards Report.)

### 3.0 SUMMARY

The following summarizes the staff's findings regarding the proposed changes:

The present vital area identification program at the San Onofre site is similar, in the extent of equipment covered, to those currently being required for plants with pending operating license applications.

In regard to change (i), the staff has been supporting the consolidation of vital areas based on the findings of the Safety/Safeguards Report which noted that internal compartmentalization can adversely affect operational safety, especially during emergency situations. The licensee's proposal will facilitate movements of personnel through the plant and permit more rapid response to abnormal situations without reducing overall plant security. The staff, therefore, agrees to this change.

Change (ii) should also have a positive effect on plant safety in that the size of the area within the second barrier has been reduced. Security has not been affected since no vital equipment has been displaced outside of the vital zone. (This has been confirmed by comparing the vital equipment lists for the old and amended plan.) The staff agrees to this change also.

Change (iii) deletes a major portion of the radwaste area from the vital list. While the technical basis for this change is not explicitly stated in this submittal, the staff understands that the justification is on the basis that this equipment is not required for the safe operation of the reactor, and has little potential for radiological sabotage. The staff agrees that the equipment and radioactive material in the radwaste area that fall outside of the revised vital boundary do not need to be designated and protected as vital. The staff accordingly agrees to this change.

Based on the above, the staff has determined that the "San Onofre Nuclear Generating Station Units 1, 2 and 3 Physical Security Plan" dated August 9, 1983, as revised, continues to meet the requirements of 10 CFR 73.55 (b) through (h), and is, therefore, acceptable.

### 4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates solely to safeguards matters and does not involve any significant construction impacts. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(12). Pursuant to 10 CFR 51.22(c) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONCLUSION

Since the amendments revise license conditions to reflect the Commission's approval of revisions to the Physical Security Plan, the staff has further concluded that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ACKNOWLEDGEMENT

C. Gaskin and E. McKenna contributed to this evaluation.

Date: August 7, 1984

August 7, 1984

Changes which would not decrease the effectiveness of your approved Physical Security Plan, as revised, may be made without approval by the Commission pursuant to the authority of 10 CFR 50.54(p). A report containing a description of each change shall be furnished to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region V, 1450 Maria Lane, Suite 210, Walnut Creek, CA 94596, with a copy to the Director, Office of Nuclear Reactor Regulation, Attn: Document Control Desk, Washington, D.C. 20555 within two months after the change is made. Records of changes made without Commission approval shall be maintained for a period of two years from the date of the change.

The subject plan, as revised, and related materials contain Safeguards Information of a type specified in 10 CFR 73.21 and are being withheld from public disclosure.

A Notice of Consideration of Issuance of Amendments to Licenses and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on May 23, 1984 (49 FR 21839). No request for hearing and no comments were received.

A copy of our related Safety Evaluation is also enclosed. This action will appear in the Commission's Monthly Notice publication in the Federal Register.

Sincerely,

Original signed by

Walter A. Paulson, Acting Chief  
Operating Reactors Branch No. 5  
Division of Licensing

Enclosures:

- 1. Amendment No. 78 to License No. DPR-13
- 2. Amendment No. 23 to License No. NPF-10
- 3. Amendment No. 12 to License No. NPF-15
- 4. Safety Evaluation

cc: w/enclosures:  
See next page

DL:ORB#5 EMcKenna:dk 6/20/84	DL:ORB#5 CJamerson 6/27/84	DL:LB#3 JLee 7/2/84	DL:LB#3 HRood 7/2/84	DL:LB#3 GKnighton 7/2/84	DL:ORB#5 W. Paulson BCrutchfield 8/2/84
DL:SSAB EMcPeck 7/13/84	DL:SSPB HBerkow 6/7/84	DL:SSPB CThomas 6/3/84	OELD LCHANDLER 8/17/84 no legal defects subject to revision	DL:AD/L TNovak 8/2/84	DL:AD/SA FMiraglia 7/26/84 D. CRUTCHFIELD

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