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October 5, 1982

Director of Nuclear Reactor Regulation
Attention: D. M. Crutchfield, Chief
Operating Reactors Branch No. 5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Radwaste Solidification System
San Onofre Nuclear Generating Station
Unit 1

During the 1980-1981 steam generator sleeving repair program, a Chem-Nuclear Dow mobile radwaste solidification unit was utilized to solidify wet solid radwaste produced from the decontamination of the steam generator channel heads. In accordance with 10 CFR 50.59, a safety evaluation was performed prior to utilizing the system. Since the safety evaluation indicated that use of the system did not involve an unreviewed safety question or a change to the Technical Specifications, it was not necessary to obtain NRC approval prior to using the system. At the present time, spent resins have accumulated at San Onofre Unit 1 such that solidification for shipment is required in order to assure sufficient storage capacity for future spent resins.

Currently, a Chem-Nuclear mobile cement solidification system is located at San Onofre Units 2 and 3 and is ready for operation. The system has been approved for operation at several nuclear sites. However, by San Onofre Unit 2 license condition 2.C(16), Radioactive Waste System, "wet solid radwaste shall not be shipped from the facility until the NRC has approved the waste solidification Process Control Program." We interpret this license condition to only apply to wet solid radwaste produced by operation of San Onofre Unit 2.

Since the Chem-Nuclear system has been judged suitable for use at San Onofre Unit 1 to solidify the accumulated spent resins, we plan to move the system from San Onofre Units 2 and 3 to San Onofre Unit 1. To reiterate, we have concluded that the San Onofre Unit 2 license condition discussed above does not prevent us from utilizing the Chem-Nuclear system to solidify wet

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solid radwaste produced at San Onofre Unit 1. However, prior to placing the Chem-Nuclear system in operation at San Onofre Unit 1, we will perform a 10 CFR 50.59 safety evaluation in accordance with the Regulations to assure that use of the system does not involve an unreviewed safety question or a change to the Technical Specifications; otherwise, we will obtain NRC approval prior to utilizing the system.

Following solidification, the resins will be shipped to a licensed burial site. San Onofre Unit 1 does not have the capability for storage of solidified resins.

If you have any questions, please contact me. Should you not concur with our plans discussed above, your prompt attention in this matter is requested since our capacity to store spent resins is now limited.

Very truly yours,

RW Krueger
for *KP Baskin*