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November 16, 1979

Director of Nuclear Reactor Regulation
Attention: Mr. D. L. Ziemann, Chief
Operating Reactor Branch #2
U.S. Nuclear Regulatory Commission
Washington, D.C., 20555

Gentlemen:

Subject: Docket No. 50-206
Systematic Evaluation Program
San Onofre Nuclear Generating Station
Unit 1

Your letter of October 24, 1979, forwarded a draft assessment of Systematic Evaluation Program Topic XV-12, Spectrum of Rod Ejection Accidents (PWR) - Radiological Consequences. That letter requested that we examine the facts upon which the staff based its evaluation and respond either by confirming that the facts defining San Onofre Unit 1 are correct or by identifying any errors. The results of our examination are attached.

If you have any questions on this matter, please contact me.

Very truly yours,

J. G. Haynes
Chief of Nuclear Engineering

Enclosure

A035
S,1/1

DUP

Attachment

Comments on Draft Assessment
SEP Topic XV-12, Spectrum of Rod Ejection Accidents-
Radiological Consequences.

1. Item 8 of Table XV-1 lists the minimum exclusion area boundary as 284 meters. This distance should be 282 meters as noted in our letter dated April 23, 1979.

2. The footnote to Table XV-1 indicates "The 0-2 hour X/Q for a ground release is 9.5×10^{-4} sec/m^3 based on the site meteorological data." Although not specified, the basis for this statement is understood to be your letter of February 8, 1979 which forwarded the topic assessment for Topic II-2.C, Atmospheric Transport and Diffusion Characteristics. In view of the comments on that topic assessment which were submitted on April 23, 1979, there is still some question regarding the value of 9.5×10^{-4} sec/m^3. Following resolution of Topic II-2.C this footnote should be revised as appropriate.

3. Table XV-2 lists doses at nearest site boundary. This table is similar to Table 2.1 included in the NRC's Amendment 25 to the Unit 1 Provisional Operating License. It is noted that the specific values listed in these two tables for a rod ejection accident are different; however, the two values are consistent. Since the values in Table XV-2 are NRC calculations, SCE cannot verify their accuracy.

DUP