May 3, 1983

Docket No. 50-206 LS05-83-05-012

> Mr. R. Dietch, Vice President Nuclear Engineering and Operations Southern California Edison Company 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770

Dear Mr. Dietch:

SUBJECT: AUDITS OF EMERGENCY AND CONTINGENCY (SECURITY) PLANS

San Onofre Nuclear Generating Station, Unit No. 1

DISTRIBUTION Docket NRC PDR Local PDR ORB Reading NSIC DCrutchfield HSmith (2) WPaulson. CThomas 0ELD ELJordan **JMTaylor** LJHarmon (2) ACRS (10) TBarnhart (4) WJones RDiggs SEPB FPagano

The Commission has issued the enclosed Amendment No. 69 to Provisional Operating License No. DPR-13 for San Onofre Nuclear Generating Station, Unit No. 1. This amendment consists of changes to the Technical Specifications in response to your application dated March 4, 1983.

By our letters dated October 1, 1982 (Generic Letter 82-17) and October 30, 1982 (Generic Letter 82-23), you were requested to assure that the provisions as stated in your Technical Specifications for carrying out independent audits of your emergency preparedness program and your safeguards contingency (security) plans are consistent with the Regulations 10 CFR 50.54(t) and 10 CFR 73.40(d), respectively. These letters stated that if your Technical Specifications contain provisions that are less frequent than the regulation, you should request the staff to modify your Technical Specifications to conform to the rule.

Rather than modifying the Technical Specifications to be consistent with the regulations, your application proposed that the related provisions be deleted. You cited the provisions of the Regulations 10 CFR 50.54(t) and 10 CFR 50.54(p) which require audits of the emergency preparedness program and the safeguards contingency (security) plans at a frequency of at least once per twelve (12) months. In addition, the regulations require that the respective audits be conducted by persons who have no direct responsibility for implementation of the emergency preparedness program and individuals independent of both security program management and personnel who have direct responsibility for implementation of the security program.

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Southern California Edison must meet the requirements of the Regulations whether or not the specific provisions are also incorporated in the Technical Specifications. As noted above 10 CFR 50.54(p) and 10 CFR 50.54(t) require audits of the security and emergency plan, respectively, by appropriate persons once per twelve (12) months, consistent with the Generic Letters referred to above. In addition, the requirements for the annual audit of the security plan is contained within the plan. We conclude, therefore, that the proposed deletions, as modified in discussions with your staff, are acceptable.

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to $10~\rm CFR~\$51.5(d)(4)$ that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of the amendment.

We have also concluded, that: (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

A copy of the Notice of Issuance is also enclosed.

Sincerely,

Original signed by

Dennis M. Crutchfield, Chief Operating Reactors Branch #5 Division of Licensing

Enclosures:

- 1. Amendment No. 69 to License No. DPR-13
- 2. Notice of Issuance

cc w/enclosures: See next page

*SEE PREVIOUS TISSUE FOR CONCURRENCE

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Mr. R. Dietch

tison must meet the requirements of the General descriptions are also incorporated

Regulations whether or not the specific provisions are also incorporated in the Technical Specifications. We conclude that the proposed deletions, as modified in discussions with your staff, are acceptable.

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A copy of the Notice of Issuance is also enclosed.

Sincerely,

Dennis M. Crutchfield, Chief Operating Reactors Branch #5 Division of Licensing

Enclosures:

 Amendment No. to License No. DPR-13

2. Notice of Issuance

cc w/enclosures: See next page

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Mayor City of San Clemente San Clemente, California 92672

Chairman
Board of Supervisors
County of San Diego
San Diego, California 92101

California Department of Health ATTN: Chief, Environmental Radiation Control Unit Radiological Health Section 714 P Street, Room 498 Sacramento, California 95814

U. S. Environmental Protection Agency Region IX Office ATTN: Regional Radiation Representative 215 Freemont Street San Francisco, California 94111

Robert H. Engelken, Regional Administrator Nuclear Regulatory Commission, Region V 1450 Maria Lane Walnut Creek, California 94596