SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 1

SUPPLEMENT TO APPLICANTS' ENVIRONMENTAL REPORT

POST OPERATING LICENSE STAGE

November 1994

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS & ELECTRIC COMPANY

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1.0 INTRODUCTION

SONGS 1 is part of a three unit station which is located within the Camp Pendleton Marine Corps Base on the coast of Southern California, in San Diego County. SCE is the primary owner and operator of the station. SONGS 1 is jointly owned by Southern California Edison Company (SCE) and San Diego Gas and Electric Company (SDG&E). The use of the property on which the three SONGS units are built was granted to SCE and SDG&E, under an easement from the United States Government, which expires on May 12, 2024.

On March 27, 1967, Provisional Operating License No. (POL) DPR-13 was issued by the AEC allowing the operation of SONGS 1. SONGS 1 began commercial operation on January 1, 1968. On July 28, 1970, SCE submitted a request for conversion of the SONGS 1 POL to a Full Term Operating License (FTOL). The Environmental Report was submitted to the NRC on August 31, 1972, in accordance with applicable regulations implementing the requirements of the National Environmental Policy Act of 1969. The NRC's Final Environmental Statement (FES) regarding the FTOL was issued in October 1973.

The license conversion process was delayed because of the inception of the NRC's Systematic Evaluation Program (SEP). This program assessed the design adequacy of older nuclear power plants, including SONGS 1. Prior to the conversion, the information contained in the FES was updated by SCE in submittals dated February 5, 1986 and August 6, 1991. The NRC issued an environmental assessment updating the 1973 FES on September 16, 1991, as part of issuing the FTOL. The NRC concluded that there were no new environmental effects nor any changes in these effects identified previously in the 1973 FES that would affect the proposed FTOL for SONGS 1. Therefore, the NRC determined that a new or amended FES was not required. The FTOL was then issued on September 26, 1991.

Subsequently, as a result of an agreement with the California Public Utilities Commission (CPUC), operation of SONGS 1 was permanently discontinued on November 30, 1992, at the end of Fuel Cycle No. 11. Since that date, SCE has defueled the reactor, stored the spent nuclear fuel in the unit's spent fuel pool (SFP), and proceeded with plant closure activities and preparations for safe storage. The SONGS 1 operating license has been amended to an Operating (Possession Only) License which became effective on March 9, 1993, and expires on March 2, 2004.

In accordance with the requirements of 10 CFR 50.82, SCE must submit an application to terminate the license and to decommission SONGS 1 within two years following the permanent shutdown of SONGS 1. The application must include a Decommissioning Plan, which can be submitted prior to the application, and pursuant to 10 CFR 51.53(b) a supplement to the environmental report.

This Supplemental Environmental Report evaluates the environmental impact of decommissioning SONGS 1. The report was prepared in accordance with the requirements of 10 CFR 51.53(b) for the plant's post operating license stage and updates the SONGS 1 environmental assessment of September 16, 1991.

1.1 Proposed Decommissioning Method

The guidance contained in the NRC's Final Generic Environmental Impact Statement (GEIS) on Decommissioning Nuclear Facilities, NUREG 0586 was considered during the preparation of this report.

SCE has evaluated the three decommissioning alternatives described in the NRC's GEIS, i.e., SAFSTOR, DECON, and ENTOMB. Based on those evaluations, the most appropriate method for decommissioning SONGS 1 is to place the unit in SAFSTOR and dismantle the plant after the permanent shutdown of SONGS 2 and 3. Those two units are scheduled to operate until 2013, the end of their license.

SAFSTOR is proposed as the most appropriate method for decommissioning SONGS 1. The reasons include the following:

1. The SAFSTOR period allows sufficient time for a low level radioactive waste disposal facility to be developed and brought into operation.

2. Decommissioning (dismantlement and decontamination) of the entire SONGS site is more cost effective than decommissioning of SONGS 1 independently.

3. The SAFSTOR period provides an interim storage facility for SONGS 1 spent fuel until such time that an independent spent fuel storage installation (ISFSI) becomes a viable option, or DOE facilities are available for off-site storage.

4. The SAFSTOR period will allow for decay of short lived radioisotopes, thus reducing exposure to workers involved in decommissioning.

The SAFSTOR period will be comprised of two phases: the first covering the period during which spent nuclear fuel is stored in the unit's SFP, and the second beginning once the spent fuel is transferred to a Department of Energy (DOE) sponsored storage facility or to an alternate spent fuel storage facility. It is anticipated that this second phase of SAFSTOR could occur as early as 1998. SCE is evaluating alternatives for long term spent fuel storage such as an on-site Independent Storage Facility. All three units will be dismantled, decommissioned, and the entire San Onofre site returned to a condition suitable for unrestricted use following the shutdown of SONGS 2 and 3.

1.2 Environmental Impact

The purpose of this Supplemental Environmental Report is to evaluate the environmental impact of placing and maintaining SONGS 1 in the SAFSTOR configuration.

1.3 Conclusion

This report concludes that SONGS 1 can be placed in the SAFSTOR decommissioning configuration without significant environmental impact, and that SAFSTOR eliminates and/or reduces the potential environmental impact due to plant power operations,

accidents, and other events which were postulated for plant power operations. No significant environmental change from that already considered in the SONGS 1 Environmental Report Operating License Stage is associated with the SAFSTOR activities. A revision of this environmental report will be submitted for NRC approval prior to initiating plant dismantlement and final decommissioning activities.

2.0 THE SITE

The site was most recently described in the NRC's environmental assessment for the Full Term Operating License dated September 16, 1991. There are no changes to this section resulting from SONGS 1 being placed in SAFSTOR.

3.0 THE PLANT

3.1 External Appearance

Plant appearance will not significantly change during the SAFSTOR period. Appearance will change once dismantlement and decommissioning begins. There have been significant changes to systems within the plant. Systems have been abandoned and removed, and certain salvageable items have been sold.

3.2 Reactor, Steam-Electric, and Fuel Inventory

All fuel has been removed from the reactor vessel and placed in the spent fuel pool. The reactor coolant system has been drained with the reactor vessel head in place and the studs detensioned. The secondary side including steam generators has also been drained. Containment was locked in May 1993. An inspection inside the containment was performed in June 1994. The turbine generator has been abandoned in place.

3.3 Plant Water Use

During SAFSTOR ocean water will still be used for cooling and dispersal of effluents. Since the Circulating Water System has been abandoned, cooling water will be provided by the salt water cooling pumps. Flow rates will normally be from 3500 gpm up to approximately 7000 gpm depending on system configuration. Sewage and radiological effluents will still be dispersed through the Circulating Water System. The radiological effluent release rate will be controlled to comply with NRC regulatory requirements since the dilution flowrate was reduced. Sewage treatment effluents will continue to comply with the NPDES effluent discharge limits.

3.4 Heat Dissipation Systems

The salt water cooling pumps will be used to provide plant cooling water to the component cooling water system. The circulating water pumps have been abandoned in place. The intake structure and inlet and discharge conduits will remain in place. The cooling water flowrate is normally between 3500 gpm and 7000 gpm depending on system configuration.

Heat treatments and chlorination will no longer be performed. During SAFSTOR, the thermal discharge from the plant is reduced because no heat is being generated by the reactor. Therefore, the impacts of the outfall on sea water will be less than during plant operation.

3.5 Radioactive Waste Systems

Gaseous wastes include radioactive airborne particulates, radioiodines, and noble gases. The plant's waste gas collection system has been abandoned because the only remaining source of noble gases are the relatively small amounts of gases that may be diffusing from the spent fuel rods that are currently stored in the Fuel Storage Building. Accordingly, the SONGS 1 Offsite Dose Calculation Manual (ODCM) specification that required the maintenance and use of a gaseous radwaste treatment system has been deleted. Historically, forced ventilation of buildings for particulates and iodines at SONGS has been performed for worker protection purposes. Those local areas with a significant potential for particulate airborne utilize portable High Efficiency Particulate (HEPA) filtration units. These practices will continue to be implemented as part of the Radiation Protection Program throughout SAFSTOR and the eventual decontamination and dismantlement of SONGS 1.

Liquid radioactive wastes will be processed in accordance with ALARA practices. The plant will principally use the existing resin ion exchange system to process liquid wastes. These liquids will be released in accordance with existing station procedures. The spent fuel pool will be the primary source for liquid radioactive wastes.

Solid radioactive wastes will result from processing liquid (e.g., spent resin) and airborne (e.g., HEPA filters) waste streams, processing activated and contaminated components (e.g., metals), and working in radiologically contaminated environments (paper, plastic, wood). The systems and equipment used to process, sort, volume-reduce, and package solid wastes will be kept operational throughout the SAFSTOR Period.

3.6 Chemical and Biocide Systems

During SAFSTOR chemicals and biocides will no longer be added to the Circulating Water System. With the removal from operation of the primary, secondary, and the circulating water systems, routine addition of chemicals to the ocean will no longer be required. The closed loop component cooling water system and the spent fuel cooling system will remain inservice as necessary. Effluents collected and released from these systems and the sanitary waste system will result in only negligible addition of chemicals to the ocean.

3.7 Sanitary Wastes and Other Effluents

The sewage treatment facility located at SONGS 1 will remain in operation. As indicated in the NRC's 1991 environmental assessment, this facility serves the entire site. The effluent is currently released to the SONGS 1 circulating water discharge. The Mesa sewage treatment plant also discharges to the SONGS 1 circulating water system. The

permits also allow the discharge of sewage through the SONGS 2 and 3 circulating water systems.

Air emissions from operation of the emergency diesel generators will be reduced and /or ultimately eliminated during SAFSTOR due to less frequent operation. Efforts are in progress to sell the diesels and remove them from the site.

3.8 Transmission Facilities

The transmission facilities will remain unchanged due to the continued operation of SONGS 2 and 3.

4.0 ENVIRONMENTAL EFFECTS OF SITE PREPARATION AND PLANT AND TRANSMISSION FACILITIES CONSTRUCTION

There are no changes to this section as a result of placing SONGS 1 in SAFSTOR

5.0 ENVIRONMENTAL EFFECTS OF OPERATION OF THE PLANT

The potential for plant operations to impact the environment has decreased since the plant was shut down. As a result of SAFSTOR, there will be no land use changes in the vicinity of the plant. Land in the vicinity of the site will not be impacted until the entire site is decommissioned and released for unrestricted access.

Activities resulting in environmental impact through water usage will either not occur or will be reduced during SAFSTOR. These activities include thermal discharge, chemical effluents, circulating water system heat treatments, and radiological releases. The plant's impact on the aquatic life will be reduced. As previously indicated, release of sewage treatment effluents will continue at SONGS 1. The impact of the shutdown of SONGS 1 on water use will be within the most recent assessment performed by the NRC.

With SONGS 1 in SAFSTOR there will be a reduction in radiological releases to the environment. As a result there will be less of a potential impact on human life, animal life, and plant life than when the plant was in operation. With SONGS 1 in SAFSTOR, the effect on non-radiological parameters such as temperature, entrainment, turbidity, induced circulation, and chemistry of the ocean water and marine life will also be less.

With SONGS 1 in SAFSTOR there is no adverse impact on transportation. If equipment or spent fuel is shipped offsite, it will be done in accordance with all transportation requirements.

6.0 ENVIRONMENTAL MEASUREMENT AND MONITORING PROGRAMS

The Radiological Environmental Monitoring Program, as described in the SONGS 1 Offsite Dose Calculation Manual (ODCM), will continue at SONGS 1 while the unit is in SAFSTOR. The program may be revised as necessary to reflect changes in the plant's condition.

7.0 ENVIRONMENTAL IMPACT OF ACCIDENTS

SONGS 1 is being maintained in accordance with the Permanently Defueled Technical Specifications (PDTS) until decommissioning is complete and the plant's Operating (Possession Only) License is terminated. The PDTS were approved by the NRC based, in part, on the reduced number of consequences of postulated accidents which are applicable when all fuel has been removed from the reactor and stored in the SFP (i.e., during the Permanently Defueled Mode).

The accident analyses performed in connection with approval of the PDTS are directly applicable to the SAFSTOR period. No accidents are credible during SAFSTOR that have not already been evaluated for establishment of the PDTS. The accident analyses for the SAFSTOR period and which support the PDTS are described below.

Only two accidents evaluated in Chapter 15 of the SONGS 1 UFSAR are relevant to the permanently defueled plant; a loss of off-site power (LOP) and a fuel handling accident. The safety significance of both of these accidents is reduced during SAFSTOR, as shown below. Additionally, the ability of the fuel storage facility to withstand other applicable UFSAR events, natural phenomena, and fires is either unchanged from that which applied when the reactor was licensed to operate or is improved during SAFSTOR.

The potential adverse safety consequences due to an LOP occurring during SAFSTOR are limited to the loss of SFP cooling. However, such an event is of minimal safety significance due to the low heat load that exists in the SFP. The low heat load allows sufficient time to recover from the event before any appreciable heatup of the SFP. In the unlikely event that electrical power and/or SFP cooling can not be restored, the SFP could be satisfactorily cooled by opening the fuel storage building to promote passive cooling and remain within 10 CFR 20 requirements.

The fuel handling accident analysis of record that applied when the reactor was licensed to operate is discussed in UFSAR Section 15.17. The analysis conservatively calculated that a two hour thyroid dose of 99 rem and a two hour whole body dose of less than one rem could result at the EAB from a fuel handling accident. The NRC concluded that those doses were acceptable since they were within the guidelines of 10 CFR 100 thyroid dose of 100 rem and whole body dose of 25 rem.

The dose consequences of a fuel handling accident during SAFSTOR are significantly less than those presented in Section 15.17 of the UFSAR. A re-evaluation of the fuel handling accident was performed to quantify the reduction in dose consequences. For conservatism,

the re-evaluation assumed the fuel handling accident occurs early in the defueled condition (110 days after reactor shutdown). The results show that the doses at the EAB for the duration of the release would be approximately 0.015 rem (thyroid) and 0.001 rem (whole body). These doses are significantly less than the two hour EAB doses reported in UFSAR Section 15.17 (i.e., 99 rem thyroid and less than one rem whole body).

In summary, the safety significance of a fuel handling accident is reduced during SAFSTOR because (1) the extent and frequency of fuel handling operations are very limited, (2) the stored fuel is significantly less reactive than predicted by the analysis of record, and (3) the dose consequences of such an accident are significantly less than those presented in the UFSAR.

Detailed planning for the dismantlement phase has not yet been performed since specific methods and procedures for decontaminating and dismantling the plant have not been finalized. Therefore, evaluation of postulated accidents that could occur during dismantlement will be performed after more detailed planning for the dismantlement phase is available. Accident analyses for the dismantlement phase will be included in the revision of this Supplemental Environmental Report that is to be submitted to the NRC prior to terminating the SAFSTOR period.

8.0 IMPLICATIONS OF THE PROJECT

SONGS 1 staffing has been realigned as necessary to support SONGS 2 and 3 operations. Minimal workforce reductions were required following this realignment.

There will be little effect on either the short-term use of the property or on the enhancement of the property's long-term productivity. This is due to the following factors:

- Location of the unit within a military base which requires protected, physical separation from adjacent residential areas, community development, and agricultural concerns.

- Close proximity of SONGS 1 to SONGS 2 and 3 which are scheduled to continue power operations until the year 2013.

- Requirement to maintain the restricted area surrounding SONGS 2 and 3 (which includes the property on which SONGS 1 is located) until the need for maintaining radiological protection of the entire site is eliminated.

- Eventual return of the site to a condition which is suitable for unrestricted use and is similar to that of the site's surrounding environs.

- Continued availability of the existing public beach access for recreational and other uses.

As discussed previously, SONGS 1 will be placed in SAFSTOR until SONGS 2 and 3 have ceased power operations. Only minimal changes, primarily associated with the sale and removal of salvageable equipment, will be made to the physical plant during SAFSTOR.

9.0 ALTERNATIVES TO THE PROPOSED PROJECT

SAFSTOR is proposed as the most appropriate means of decommissioning SONGS 1. The SAFSTOR period will be comprised of two phases: (1) spent nuclear fuel stored in the plant's SFP and (2) all spent fuel removed from the SFP and transferred to either a DOE-sponsored storage facility or to an alternate spent fuel storage installation. This second phase could occur as early as 1998. The following sections discuss potential alternative decommissioning methods and their impact on the environment to allow an evaluation of the appropriateness of the proposed decommissioning method.

9.1 No Action

The alternative of taking no action is normally considered in environmental reports to provide a comparative basis for evaluating the environmental impact of proceeding with a proposed project. However, the no-action alternative is not a viable option for terminating the SONGS 1 Operating (Possession Only) License. The CPUC, SCE, and SDG&E have reached an agreement which, for economic reasons, dictates that the plant will no longer generate electricity.

NRC regulations (10 CFR 50.82) require that an application for decommissioning a permanently shutdown nuclear power plant and terminating its license be submitted to the NRC within two years after permanent cessation of operations. Those regulations also stipulate that, for electric utility licensees, the decommissioning alternative identified in the application would be considered acceptable if it provides for completion of decommissioning within 60 years. Therefore, due to the CPUC agreement and the NRC's decommissioning-related regulations, the no action alternative is not a viable means of terminating the plant's Operating (Possession Only) License.

9.2 Alternative Decommissioning Methods

DECON is the decommissioning alternative considered in the NRC's GEIS which provides for equipment, structures, and portions of a facility containing radioactive contaminants to be removed or sufficiently decontaminated to allow release of the property for unrestricted use shortly after cessation of operations.

The DECON alternative was not selected, in part, because of the lack of a low-level radioactive waste storage facility and of an off-site repository for the long-term storage of spent nuclear fuel. An additional consideration which makes this alternative less attractive is the potential for interfering with ongoing SONGS 2 and 3 operations if DECON were immediately pursued. Finally, near-term plant dismantlement would result in higher occupational and public radiation exposures, as well as a higher volume of radioactive waste.

ENTOMB is the decommissioning alternative considered in the NRC's GEIS for which radioactive contaminants are encased in a structurally long-lived material, such as concrete. The entombed structure is appropriately maintained, and surveillance is continued, until the radioactivity decays sufficiently so that the site can be released for unrestricted use. However, for the reasons stated below, ENTOMB is not a viable decommissioning alternative for SONGS 1.

Due to the long half-lives of many of the radionuclides present at SONGS 1, entombment of the plant is not a practical decommissioning alternative. If that alternative were pursued, the entombed plant would require continuation of plant maintenance and surveillance far beyond the 60-year decommissioning time frame specified by 10 CFR 50.82.

Additionally, as discussed in Section 1.0 of this Supplemental Environmental Report, the use of the property on which the three San Onofre units are built was granted to SCE and SDG&E until May 12, 2024, under an easement from the U.S. Government. The terms of that easement call for the removal of all structures and improvements, if so desired by the government, and restoration of the land to a satisfactory condition upon termination of the easement. Therefore, entombment of any of the San Onofre units is precluded by the termination conditions specified in the site easement, as well as by the long half-lives of many of the radionuclides present at the plant.

9.3 Longer-Term Fuel Storage in Spent Fuel Pool

SCE's decommissioning planning for SONGS 1 is based on discontinuing the storage of spent nuclear fuel in the plant's SFP. The spent fuel will be transferred either to a DOE-sponsored storage facility or to an alternate spent fuel storage installation. This will minimize the expense and radiological impact of maintaining the plant in a safe, dormant condition.

The environmental impact associated with the storage of spent fuel is reduced by removing the fuel from the SFP. Specifically, occupational radiation exposures, off-site release to the environment to the environment of radioactive liquid and airborne effluents, and accumulation of solid radioactive wastes due to operation of the SFP cooling and cleanup system will all be reduced by discontinuing storage in the SFP.

9.4 Longer SAFSTOR

The proposed means of decommissioning SONGS 1 provides for maintaining the plant in SAFSTOR status until SONGS 2 and 3 have permanently ceased power operations. Plant dismantlement, decommissioning, and subsequent site restoration is planned for 2013 through 2024. The easement for the site specifies, in effect, that decommissioning of all three units and site restoration must be completed upon termination of the easement on May 12, 2024.

10.0 DECOMMISSIONING COST ESTIMATE VALUE

In 1993, SCE contracted with TLG Services, Inc.[1] to conduct a site-specific decommissioning cost estimate for SONGS. This cost study was used to support SCE's 1995 General Rate Case filing with the California Public Utilities Commission (CPUC). The 1993 estimate is summarized for SONGS 1 in Table10-1. The detailed cost estimate, is provided in the SONGS 1 Decommissioning Plan. The estimated cost to decommission SONGS 1 is $229 million (1993 dollars); the estimated cost to restore the site to its original conditions is $42 million (1993 dollars); and, therefore, the total cost to decommission and return the site to its original condition is $271 million (1993 dollars). This estimate includes the capital cost associated with dry cask storage and the running costs to maintain SONGS 1 in protective storage from 2004 to 2013. Costs prior to 2004 will be funded from Operations and Maintenance expense (O&M).

SCE currently expects to return the site to its original condition consistent with the grant of easement from the United States Government. The grant requires SCE to restore "the Premises to a condition satisfactory to the Director, southwest Division, Bureau of Yards and Docks."

[1]TLG Services Inc., is a recognized leader in decommissioning cost estimates, having prepared estimates for more than 70 nuclear units and having been involved in more than 50 regulatory rate hearings.

TABLE 10-1

SONGS 1 DECOMMISSIONING COST ESTIMATE

100% Level 1993 $ In Millions

Decontamination	6
Removal	56
Packaging	5
Shipping	4
Burial (offsite)	48
Decommissioning Staffs	74
Dry Cask Storage Costs	30
Other	48
TOTAL	271

REFERENCES

1 "San Onofre Nuclear Generating Station, Unit 1, Southern California Edison Company's Environmental Report, Operating License Stage, Volumes I and II," Southern California Edison Company, August 31, 1972.

2 "Final Environmental Statement Related to Operation of San Onofre Nuclear Generating Station, Unit 1," U.S. Nuclear Regulatory Commission, October, 1973.

3 Letter, M.O. Medford (SCE) to G.E. Lear (NRC), "Docket No. 50-206, Environmental Review for License Conversion, San Onofre Nuclear Generating Station, Unit 1," February 5, 1986.

4 Letter, R.M. Rosenblum (SCE) to NRC Document Control Desk, "Docket No. 50-206, Radiological Environmental Input for FTOL, San Onofre Nuclear Generating Station, Unit 1" August 6, 1991.

5 Letter, B.A. Boger (NRC) to Harold B. Ray (SCE), "San Onofre Unit 1 Full-Term Operating License (TAC No. 11232)," September 26, 1991.

6 "Environmental Assessment by the Office of Nuclear Reactor Regulation Relating to the Conversion of the Provisional Operating License to a Full-Term Operating License, Docket No. 50-206," U.S. Nuclear Regulatory Commission, September 16, 1991.

7 "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities," NUREG-0586, U.S. Nuclear Regulatory Commission, August, 1988.

8 Letter, Harold B. Ray (SCE) to NRC Document Control Desk, "Docket No. 50-206, Amendment Application No. 203, San Onofre Nuclear Generating Station, Unit 1," April 2, 1992.

9 Letter, J.O. Bradfute (NRC) to Harold B. Ray (SCE), "Issuance of Amendment for the San Onofre Nuclear Generating Station, Unit No. 1 (TAC No. M83123)," October 23, 1992.

10 Letter, W.C. Marsh (SCE) to NRC Document Control Desk, "Docket No. 50-206, Corrected Copy of Letter Certifying Permanently Defueled Status, San Onofre Nuclear Generating Station, Unit 1," March 10, 1993.

11 Letter, M.K. Webb (NRC) to Harold B. Ray (SCE), "Issuance of Amendment No. 155 to Facility Operating License No. DPR-13, San Onofre Nuclear Generating Station, Unit No. 1, Permanently Defueled Technical Specifications (TAC No. M86377)," December 28, 1993.

12 "Off-Site Dose Calculation Manual, Unit 1," Revision 9, Southern California Edison Company, August 4, 1993.

16 "Decommissioning Cost Study for the San Onofre Nuclear Generating Station," Report to the Southern California Edison Company, TLG Services, Bridgewater, CT, June, 1993.

13 Letter, Harold B. Ray (SCE) to NRC Document Control Desk, "Docket No. 50-206, Amendment Application No. 211, Permanently Defueled Technical Specifications, San Onofre Nuclear Generating Station, Unit 1," May 12, 1993.

13 Letter, W.C. Marsh (SCE) to NRC Document Control Desk, "Docket No. 50-206, Amendment Application No. 211, Supplement 1, Fuel Storage Facility Thermal and Structural Analyses, Permanently Defueled Technical Specifications, San Onofre Nuclear Generating Station, Unit 1," June 30, 1993.

14 Letter, W.C. Marsh (SCE) to NRC Document Control Desk, "Docket No. 50-206, Amendment Application No. 211, Supplement 2, Permanently Defueled Technical Specifications, San Onofre Nuclear Generating Station, Unit 1," November 23, 1993.

15 Letter, D.L. Zeimann (NRC) to R. Dietch (SCE), "Systematic Evaluation Program Topic XV-20, Radiological Consequences of Fuel Damaging Accidents (Inside and Outside Containment)," January 17, 1980.