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 EISENHUT, D.G. Division of Licensing

SUBJECT: Comments on NUREG-0490, "Suppl to DES re Operation of San Onofre Nuclear Generating Station Units 2 & 3." Statement in Section 7.1.4.3 re whole body dose counts requires clarification.

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March 24, 1981

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Director, Office of Nuclear Reactor Regulation
Attention: Darrel G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Sir:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

References: Realistic Estimates of the Consequences of Nuclear Accidents,
M. Levenson and F. Rahn, EPRI, November, 1980.

This letter provides Southern California Edison Company's comments to the Supplement to Draft Environmental Statement related to the operation of San Onofre Nuclear Generating Station Units 2 and 3 NUREG-0490. In our review of this document we have found two points which we feel are in need of further clarification prior to the issuance of a Final Environmental Statement.

1. The following statement contained in Section 7.1.4.3,

"The 200-rem whole-body dose figure corresponds approximately to a threshold value for which hospitalization would be indicated for the treatment of radiation injury. The 25-rem whole-body (which has been identified earlier as the lower limit for a clinically observable physiological effect) and 300-rem thyroid figures correspond to the Commission's guideline values for reactor siting in 10 CFR Part 100."

requires clarification, to prevent the statement from being misconstrued to state that San Onofre does not meet the Commission siting guidelines of 10 CFR 100.

In order to clearly differentiate between the Class 9 accident and the design basis accidents used in the Commission siting criteria, specific clarification is needed. The traditional Design Basis Accidents (DBA's) are hypothetical and conservative scenarios, evaluated in accordance with regulations and other regulatory guidance which define the required assumptions and methodology. In contrast, the Class 9 accident scenario is defined with no consideration of mitigation by engineered safety features, assumes highly conservative and consequence maximizing behavior of natural mitigation processes. Since the Class 9 accident uses much more conservative, unrealistic, assumptions, it is not considered in the evaluation of reactor siting.

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2. Although uncertainties in probability calculations are discussed in Sections 7.1.4.2 and 7.1.4.7 of the Supplement, the uncertainties in the source terms, and hence the consequences of the accident, are not discussed in either Section 7.1.4.3 or 7.1.4.7. These radiation source terms have been shown to be conservative by experiments performed at Rockwell, Karlsruhe, Oak Ridge National Laboratory, General Electric (Aircraft Nuclear Propulsion Department), Bettis National Laboratory, Hanford National Laboratory, and tests performed in the Idaho Reactor Test Site. The results of these tests and experiments, summarized in a paper by M. Levenson and F. Rahn of the Electric Power Research Institute, indicate that natural processes are operating which prevent the release of radioactive nuclides from molten nuclear reactor fuel (Reference 1). Dr. Chauncey Starr, former President of the Electric Power Research Institute advised the Commission, at the Commission's November 18, 1980 meeting in Washington, D.C., that,

"The important issue is that the initial review of this subject appears to indicate that under any conceivable realistic circumstance, the real source term is likely to result in risk to the public that is less by factors of 10 to 100 than that which was previously estimated."

Using Dr. Starr's estimate of a realistic maximum release into the atmosphere would lower the consequences (acute fatalities and cancer deaths) from a Class 9 accident by 1 to 2 orders of magnitude.

The Final Environmental Statement for San Onofre Units 2 and 3 should be accurate, concise, and not leave room for misinterpretation. Where applicable, all sources of error, and the relative magnitude of error, should be indicated. We hope that these comments will help to make the FES for SONGS 2 and 3 such a document.

Very truly yours,

K P Bushan