



Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

F. R. NANDY
MANAGER OF NUCLEAR LICENSING

July 27, 1990

TELEPHONE
(714) 587-5400

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C.
20555

Gentlemen:

Subject: Docket No. 50-206
Request for Additional Information
Radiological Effluent Technical Specifications (GL 89-01) (TAC No. 75527)
San Onofre Nuclear Generating Station, Unit 1

References: (a) Letter, Same subject, J. E. Tatum (NRC) to Mr. Harold B. Ray (SCE), dated March 23, 1990.
(b) Letter, Same subject, F. R. Nandy (SCE) to NRC, dated May 21, 1990.

Reference (a) forwarded an enclosure which requested additional information needed to continue the NRR review of the Southern California Edison (SCE) San Onofre Unit 1 License Amendment Application No. 175, dated December 12, 1989. In accordance with reference (b), the attachment to this letter provides the requested information.

As discussed in the attachment, Enclosure I provides two revised Technical Specification Amendment Application No. 175 pages. Enclosure II provides a draft of the ODCM, as requested by Generic Letter 89-01, for your use in the review of our application.

NOTE: J. TATUM is
PM + He wants ONLY
1 CY NOT 5 CYS

9008010055 900727
PDR ADOCK 05000206
P PDC

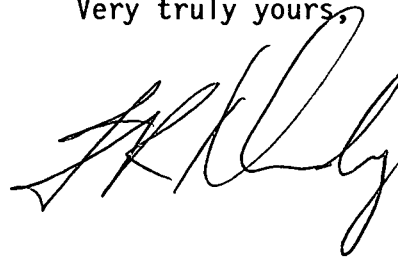
045

A009
11

July 27, 1990

If you require any additional information, please call me.

Very truly yours,

A handwritten signature in dark ink, appearing to be "J. B. Martin", written in a cursive style.

Attachment w/enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V
J. E. Tatum, US NRC SONGS, Project Manager
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre

ATTACHMENT

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION

Mr. J. E. Tatum's (NRC) letter to Mr. Harold B. Ray (SCE), dated March 23, 1990, forwarded an enclosure which requested additional information needed to continue the review of the Southern California Edison (SCE) San Onofre Unit 1 License Amendment Application No. 175, dated December 12, 1989. This attachment provides the SCE response for the requested information, in a "question and answer" format, as follows:

QUESTION 1

"By letter dated February 26, 1988, the licensee submitted Amendment Application No. 147. The current Amendment Application No. 175 supersedes the licensee's previous request to some extent, but the licensee has not addressed this matter in the current submittal. The licensee should supplement Amendment Application No. 175 to address this matter."

RESPONSE

Amendment Application No. 147 requested changes to Technical Specification (TS) Sections 3.5.5, 3.5.9 and 4.1.3. Amendment Application No. 175 requests changes to TS Sections 3.5.9 and 4.1.3. SCE requests suspension of NRC review and approval of Amendment Application No. 147 for TS Sections 3.5.9 and 4.1.3. However, Amendment Application No. 147 for TS Section 3.5.5, "Containment Isolation Instrumentation", is still requested.

QUESTION 2

"The licensee's submittal contains nonstandard verbiage in the following proposed specifications:

- a. Sections 6.8.4.f(5), 6.13.2 and 6.14.2.*
- b. Annual Radiological Environmental Operating Report, Section 6.9.1.6 (footnote).*

"The licensee should revise its amendment application to include why standard verbiage suggested by Generic Letter 89-01 or explain why the verbiage is not appropriate."

RESPONSE

TS Section 6.8.4.f(5), page 6.8-4, had been revised to include the word "respectively" in describing the determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year. This change was editorial, and upon further review should be deleted from the application. SCE will retain the existing TS wording. Enclosure 1 contains proposed TS page 6.8-4, with this deletion identified.

With respect to the non-standard wording in TS Sections 6.13.2 and 6.14.2, SCE did not identify in the application request that SCE desired to retain the existing Unit 1 TS Section 6 Administrative Controls on the review and approval of changes to the ODCM and PCP. Existing Unit 1 administrative controls were implemented on August 27, 1984, with the issuance of Amendment No. 79 to Provisional Operating License DPR-13.

Amendment No. 79 established that the review and approval of ODCM and PCP changes would require Station Manager approval only after a technical review had been conducted in accordance with TS Section 6.5.2.9 at the request of the Station Manager. Currently, the Station Manager has designated the Technical Division to perform this technical review and approval. This requirement is consistent with the Units 2 and 3 Technical Specifications.

SCE believes the review by the Technical Division is more appropriate than a review by the Onsite Safety Review Committee (OSRC), which is suggested in GL 89-01. If SCE provided the ODCM and PCP to OSRC for review, the principal OSRC members who are cognizant of this area are: the Station Manager (Chairman of OSRC); the Technical Manager and the Chemistry Supervisor (who must initially review and approve the ODCM prior to issuance); and the Health Physics Manager (who must initially review and approve the PCP prior to issuance). Therefore, SCE believes that creating a new administrative process which provides the ODCM and PCP to the OSRC would not result in any significant improvement in technical review.

With respect to the footnotes on page 6.9-3, the initial submittal was apparently misleading with respect to placement of the asterisk (*). SCE intended to utilize the standard wording of GL 89-01 for page 6.9-3. A revised page 6.9-3 is included in Enclosure I to indicate proper placement of the asterisk.

QUESTION 3

"The licensee's current Technical Specification, Section 6.10.2, does not contain the following Standard Technical Specification requirement for record retention:

"6.10.3.n Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

"In so far as the guidance provided by Generic Letter 89-01 is based on Standard Technical Specification requirements, the licensee should revise its submittal to include this requirement or explain why this requirement is not appropriate."

RESPONSE

With respect to the non-STs wording in TS Section 6.10.3.n, SCE did not identify in the application request that SCE desired to retain the existing Unit 1 TS Section 6 Administrative Controls on record retention requirements. SCE's retention of the existing administrative controls, described in Section 6.10.3, maintains consistency with the Units 2 and 3 Technical Specifications, which also do not contain STS Section 6.10.3.n.

SCE has assessed incorporation of STS Section 6.10.3.n into the Unit 1 TS. SCE notes that, in accordance with the SCE Topical Quality Assurance Manual (TQAM), SCE currently requires retention of environmental radiological analysis data.

Routine surveillances are performed at periodic intervals by the SCE Nuclear Oversight Division (NOD) on the Radiological Environmental Monitoring Program, including the quality and adequacy of data and data retention. Based on the NOD surveillances, SCE believes that equivalent compliance to the STS wording on record retention is currently being achieved under the existing Technical Specification requirements.

QUESTION 4

"In general, there are certain aspects of the licensee's existing Technical Specifications in the Administrative Controls Section that do not conform to Standard Technical Specification requirements. For example, the licensee's Technical Specifications do not require the Nuclear Safety Group to conduct audits of the Radiological Environmental Monitoring Program, the Offsite Dose Calculation Manual, and the Process Control Program. Such administrative controls are necessary before the changes suggested by Generic Letter 89-01 can be implemented. The licensee should revise its submittal to include those Standard Technical Specification requirements that are of this nature. Where the licensee does not believe a specific requirement is appropriate, an explanation should be provided."

RESPONSE

With respect to the non-STs wording in TS Section 6, SCE did not identify in the application request that SCE desired to retain the existing Unit 1 TS Section 6.5.2, "Technical Review and Control", and Section 6.5.3, "Nuclear Safety Group" (NSG), administrative control requirements. SCE's retention of the existing administrative controls, described in Sections 6.5.2 and 6.5.3, maintains consistency with the Units 2 and 3 Technical Specifications.

SCE has assessed incorporation of STS Sections 6.5.2 and 6.5.3 into the Unit 1 TS. The difference between SCE's existing TS and the STS TS is that: SCE TS 6.5.2 requires the Station Manager to "... assure the performance of a review by a qualified individual/organization..." for the Radiological Environmental Monitoring Program (REMP), Offsite Dose Calculation Manual (ODCM), and Process Control Programs (PCP); while, STS TS 6.5.3 delegates this function to the NSG. Currently, the actual review and audits are being performed by the Health Physics and Environmental (HP&E) Section (for the PCP) and NOD (for the REMP and ODCM).

Adoption of the STS Section 6.5.3 would transfer this responsibility from the Station Manager to the Nuclear Safety Group (NSG). NSG is required to perform review and audit of many areas. NSG accomplishes many of their review and audit tasks by assigning responsibility to other groups, such as NOD. SCE believes that if the review and audit function were reassigned from the Station Manager to the NSG, the actual audits would still be performed by HP&E and NOD.

Accordingly, SCE believes that the existing Unit 1 TS Sections 6.5.2 and 6.5.3 accomplish the regulatory intent of ensuring periodic technical review and audit.

QUESTION 5

"As discussed with Mr. Llorens of the licensee's staff, the proposed ODCM which was submitted with Amendment Application No. 175 is not in a condition that would support issuance of the requested Technical Specification amendment. The licensee should provide a copy of the proposed ODCM which has been revised accordingly with its next submittal."

RESPONSE

Attached is a draft of the ODCM, as requested by Generic Letter 89-01, for use in the review of Amendment Application No. 175. SCE regrets any inconvenience if the proposed ODCM, which was submitted with Amendment Application No. 175, was not in a condition that would support issuance of the requested Technical Specification amendment.

ENCLOSURE I

Technical Specification Pages 6.8-4 and 6.9-3 to Amendment Application No. 175
San Onofre Nuclear Generating Station, Unit 1