## MAR 1 5 1979

Docket No. 50-206

Mr. James H. Drake Vice President Southern California Edison Company 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770

DISTRIBUTION Docket(50-206) NRC PDR DEisenhut Local PDR TERA ORB#2 RDG JRBuchanan NRR RDG ACRS(16)VStello -DDavis BGrimes RVollmer **OELD** OI&E(3)DLZiemann ABurger HSmith

Dear Mr. Drake:

Comments received on the draft evaluations of Systematic Evaluation Program Topics II-1.A and II-1.B have been reviewed and the evaluations have been revised. The revised draft evaluations, copies enclosed, supersedes the evaluations issued by our letter dated September 11, 1978.

You are requested to examine the facts upon which the staff has based its evaluations and respond either by confirming that the facts are correct, or by identifying any errors. If in error, please supply corrected information for the docket. We encourage you to supply for the docket any other material related to these topics that might affect the staff's evaluation.

Your response within 30 days of the date you receive this letter is requested. If no response is received within that time, we will assume that you have no comments or corrections.

Sincerely,

Original Signed by: Dennis L. Ziemann

Dennis L. Ziemann, Chief Operating Reactors Branch #2 Division of Operating Reactors

Enclosures: Topic II-1.A II-1.B

cc w/enclosures: See next page

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#### Mr. James H. Drake

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### SAN ONOFRE UNIT 1

## Topic II-1.A - Exclusion Area Authority and Control

The safety objective of this topic is to assure that appropriate exclusion area authority and control are maintained by the licensee as required by 10 CFR Part 100.

The San Onofre Nuclear Generating Station is located on the coast of Southern California in San Diego County, approximately 62 miles southeast of Los Angeles and 51 miles northwest of San Diego. The site is located entirely within the boundaries of the United States Marine Corps Base, Camp Pendleton, California. The Unit 1 power block occupies 11.7 acres in the northwestern part of the property and Units 2 and 3, which are presently under construction, occupy 19.5 acres southeast of Unit 1. The site boundaries and principal plant structures are shown in Figure 1.

The minimum exclusion area boundary distance for the San Onofre site was specified as 0.5 mile in the Unit 1  $FSAR^{(1)}$ . The exclusion area was subsequently reduced to its present size during the course of the construction permit licensing proceedings for Units 2 and 3. The exclusion area for the San Onofre site, as described in Amendment 52 to the Unit 1  $FSAR^{(2)}$  is shown in Figure 1. The minimum exclusion area distance for Unit 1 is 1,000 feet measured from the center of Unit 1 containment northwestward to the nearest point on the

exclusion area boundary. It is noted that the exclusion area for Unit 1 is the same as the exclusion area for Units 2 and 3. The licensee's authority to control all activities within the exclusion area was acquired by a grant of easement from the United States of America made by the Secretary of the (3) Navy in 1964 and modified by an amendment dated September 18, 1975. All mineral rights in the land portion of the exclusion area are held by the United States Government.

The exclusion area is traversed by Interstate Highway 5, old U.S. Highway 101, and the Atchison, Topeka and Santa Fe Railroad. The exclusion area on the seaward side of the site extends over the Pacific Ocean. Arrangements have been made with appropriate state, local and federal agencies to control the movement of people on the transportation routes through the exclusion area in the event of a plant emergency. These arrangements are documented in the Emergency Plan for the San Onofre Nuclear Generating Station<sup>(4)</sup> and are applicable to all three nuclear units on the site.

The licensee's control of the landward portion of the exclusion area extends to the mean high water line but does not include the strip of beach lying between the high water line and the Pacific Ocean. This tidal beach is owned by the State of California. The licensee's lack of control over the tidal beach has been adjudicated in a Commission proceeding<sup>(5)</sup> on the construction of Units 2 and 3 and has been declared "de minimus" on the basis of its infrequent use together with the high probability that the radiation exposure a tidal beach user might experience in the event of an accident will be within the guideline values of 10 CFR Part 100. As part of the

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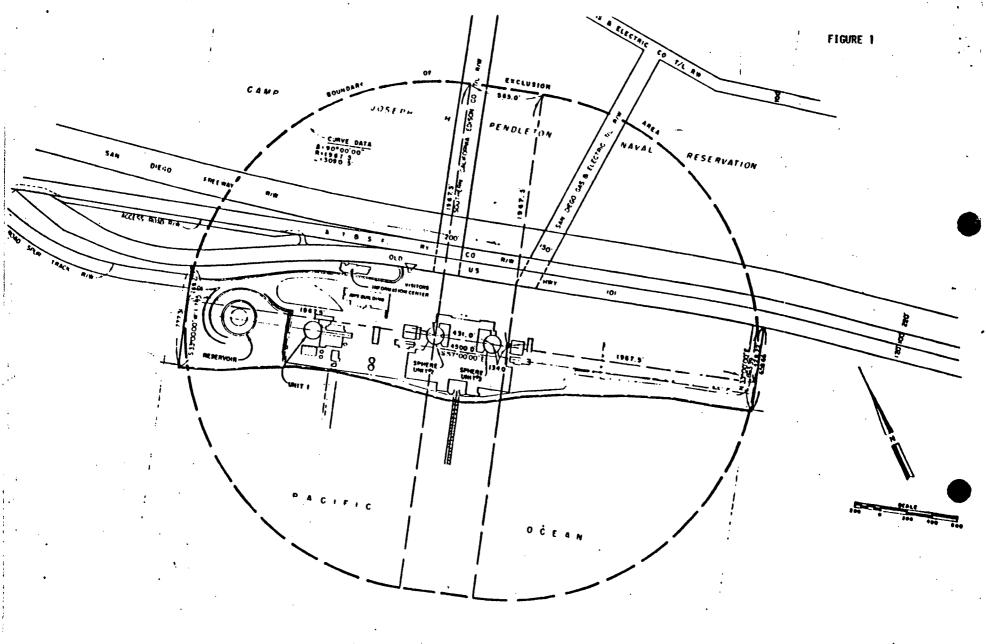
commitments made during the Unit 2 and 3 construction permit proceedings, the licensee will install a beach walkway and fences in front of the station seawall and will institute other administrative controls to minimize the use of the seaward portion of the exclusion area  $\binom{6}{}$ .

We conclude that the licensee has the proper authority as required by 10 CFR Part 100 to determine all activities within the exclusion area and that appropriate and effective arrangements have been made to control traffic on the transportation routes and portions of the exclusion area accessible to the public in the event of an emergency. This completes the evaluation of this SEP topic. Since the plant design conforms to current licensing criteria, no additional SEP review is required.

## References

- 1. San Onofre Unit 1 FSAR. Section 1,1
- 2. San Onofre Unit 1 Amendment 52 to FSAR December 1975
- 3. San Onofre Units 2 & 3 PSAR. Section 1.8
- 4. San Onofre Units 2 & 3 Emergency Plan
- 5. ALAB 432. 6NRC465 (1977)
- 6. San Onofre Units 2 & 3 FSAR. Section 2.1

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#### SAN ONOFRE UNIT 1

# Topic II-1.B - POPULATION DISTRIBUTION

The safety objective of this topic is to assure that the low population zone and population center distance specified for the site are compatible with the current population distribution and are in conformance with the guidance of 10 CFR Part 100.

Information on the population distribution in the region surrounding the San Onofre Nuclear Generating Station has been updated several times since the issuance of a construction permit for Unit 1 primarily as part of the licensee's application to construct and operate Units 2 and 3. The most current estimates of the population of the San Onofre site are contained in the Units 2 and 3  $FSAR^{(1)}$ . Both the low population zone and population center distances have been revised during the course of the construction permit licensing proceedings for Units 2 and 3.

The low population zone for the San Onofre site, which is the same for Units 1, 2 and 3, is specified to be the area within a radius of 1.95 miles measured from a point midway between Units 2 and 3, as shown in Figure 2.1-12 of the Units 2 and 3 FSAR. The distance to the outer boundary of the low population zone measured from the center of the Unit 1 containment is about 1.8 miles. The low population zone is contained entirely within the boundaries of Camp Pendleton. The residential population in the low population zone was estimated to be about 1,130 in 1976 and is expected to increase to about 1,200 by 1980 and to remain at about that level over the lifetime of the plant. The City of San Clemente

#### has been

designated as the nearest population center, as defined in 10 CFR Part 100. San Clemente had an estimated population of approximately 25,000 in 1978. The distance from the Unit 1 reactor to the nearest corporate boundary of San Clemente is approximately 2.5 miles. The distance to the nearest residence within the city limits, that of former President Richard Nixon, is approximately 2.7 miles. The San Clemente Planning Department has indicated that there is no potential for future residential growth south of the Nixon residence because of the U.S. Coast Guard and Naval Reservations which lie between the City of San Clemente and the San Onofre site. The population center distance of 2.7 miles for Unit 1 is greater than one and one-third times the low population zone distance of 1.8 miles, as required by 10 CFR Part 100.

The changes in the population distribution in the vicinity of the San Onofre Nuclear Power Station have been well documented as the result of the licensing activities on Units 2 and 3, and we conclude that the population center distance and low population zone for Unit 1 have been properly revised so that Unit 1 is currently in conformance with the distance requirements of 10 CFR Part 100. This completes the evaluation of this SEP topic. Since the plant design conforms to current licensing criteria, no additional SEP review is required.

## References

1. San Onofre Units 2 & 3 - FSAR. Section 2,1

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