

MAR 16 1984

Docket File

Docket Nos. 50-206/361/362

MEMORANDUM FOR: Olan D. Parr, Chief
Auxiliary Systems Branch
Division of Systems Integration

FROM: Cecil O. Thomas, Chief
Standardization & Special Projects Branch
Division of Licensing

SUBJECT: REVIEW REQUEST OF PROPOSED SAFEGUARDS SAFETY EVALUATION
REPORT STATEMENT - SAN ONOFRE NUCLEAR GENERATING STATION

Enclosed is an updated Safeguards Safety Evaluation Report (SSER) statement resulting from the review of Southern California Edison Company's December 16, 1983 10 CFR 50.90 application to amend the Physical Security Plan for the San Onofre Nuclear Generating Station, Units 1, 2, and 3. We request your assistance in reviewing this SSER update as it involves San Onofre's vital area program. Please note that certain portions of the application have been denied.

Time spent on this review effort should be reported on TACS Nos. 53441 (Unit 1), 53442 (Unit 2), and 53443 (Unit 3) under Planned Accomplishment No. 113.

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Cecil O. Thomas, Chief
Standardization & Special
Projects Branch
Division of Licensing

Enclosure:
Updated SSER

cc: w/o enclosure
E. McPeek
C. Jamerson
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
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1.0 Introduction

The Southern California Edison Company (SCE) has filed with the Nuclear Regulatory Commission a request to amend the San Onofre Nuclear Generating Station Security Plan for Units 1, 2, and 3.

2.0 Discussion

By letters dated September 29, and December 16, 1983, SCE submitted for staff review and approval a revision to their physical security plan involving a major reconfiguration of San Onofre vital area program.

10 CFR 73.55 requires that vital equipment be located within a vital area^{1/} which in turn must be located within a protected area. Licensees are to positively control access into the vital areas. Access is to be limited to individuals who are authorized access to vital equipment and who require such access to perform their duties. Vital areas that are normally unoccupied are required to be locked and protected by an intrusion alarm system. Guidance regarding the specific plant equipment to be protected as vital is contained in Review Guideline No. 17 (which directs

^{1/}A vital area means any area which contains vital equipment. Vital equipment means any equipment, system device or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation. Equipment or systems which would be required to function to protect public health and safety following such a failure, destruction or release are also considered to be vital.

the facility to Regulatory Guide 1.29), and NUREG-0992^{2/} which sets forth certain equipment that should be separately protected on a generic basis. Other than as shown in NUREG-0992, there are no requirements or guidance relative to the size of a vital area, compartmentalization of equipment, or interior controls. The licensee has complied with all current requirements and staff guidance regarding vital area identification and protection.

The licensee's proposed reconfiguration contains four major parts which in summary form includes:

- i. Consolidating several adjacent vital areas into a single vital area,
- ii. Reducing the size of several large vital areas by compression of the boundaries,
- iii. Moving certain equipment not required for plant safety outside of the vital boundary, and
- iv. Deleting certain other safety-related equipment (and the areas in which they are located) from the vital list.

No substitute or compensatory measures have been proposed relative to this change.

Findings

The present vital area identification program at the San Onofre site is similar, in the extent of equipment covered, to those currently being required for plants with pending operating license applications.

^{2/}Report of the Committee to Review Safeguards Requirements at Power Reactors, May 1983. (Also known as the Safety/Safeguards Report)

In regard to change (i), the staff has been supporting the consolidation of vital areas based on the findings of Safety/Safeguards Report which noted that internal compartmentalization can adversely affect operational safety, especially during emergency situations. The licensee's proposal will facilitate movements of personnel through the plant and permit more rapid response to abnormal situations without reducing overall plant security. The staff therefore agrees to this change.

Change (ii) should also have a positive effect on plant safety in that the size of the area within the second barrier has been reduced. Security has not been affected since no vital equipment has been displaced outside of the vital zone. The staff agrees to this change also.

Change (iii) deletes a major portion of the radwaste area from the vital list. While the technical basis for this change is not explicitly stated in this submittal, the staff understands that the justification is on the basis that this equipment is not required for the safe operation of the reactor, and has little potential for radiological sabotage. The staff agrees with this position and to the change.

Change (iv) would delete certain portions of the emergency core cooling, residual heat removal, and component cooling water systems from the equipment designated as vital. The stated basis for this change is an analysis performed by the licensee reportedly using the same criteria and methods employed by Los Alamos National Laboratory (LANL) (when they perform such analyses for the staff).

Currently, during pre-licensing (and amendment) reviews the staff assesses the acceptability of vital area identification programs against the broadly

based regulatory language of §73.2(i) and the guidance documents, since during the review there is generally no validated technical basis for accepting alternative proposals. This normally results in all major safety systems and their water sources being protected as vital. Subsequent to an independent analysis performed by LANL for the staff (under prescribed assumptions) and site validation by the staff, it may be found that certain of the safety systems need not be included within the vital boundary.

In the case of San Onofre, LANL has completed their vital area analysis report and delivered it to the staff. Several months of effort will be required to convert the report language into useable form, and the site validation, which is the next step in the process, is not scheduled until the next fiscal year. Without the technical foundation provided by this process, the staff finds no basis for agreeing that the licensee's revised vital area program satisfies regulatory intent. Accordingly, pending the completion of vital area validation process the staff does not agree to change (iv).

Conclusions

It is the staff's judgement that the San Onofre Nuclear Generating Station Security Plan as amended by changes (i), (ii), and (iii) continues to satisfy the requirements of 10 CFR 73.55. It is also the staff's judgement that there is no current, acceptable technical basis for the deletion of certain safety systems from the vital area program.