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November 27, 1989

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

Gentlemen:

Subject: Docket Nos. 50-206, 50-361 and 50-362
Safeguards Contingency Planning for Surface
Vehicle Bombs - Generic Letter 89-07
San Onofre Nuclear Generating Station
Units 1, 2 and 3

- References: 1. NUREG/CR-5246, "A Methodology to Assist in Contingency Planning for Protection of Nuclear Power Plants Against Land Vehicle Bombs," April 1989
2. October 27, 1989 letter from H. E. Morgan (SCE) to Document Control Desk (NRC); Subject: Docket 50-206, 50-361 and 50-362; San Onofre Nuclear Generating Station Units 1, 2 and 3; 10 CFR 50.54(p) Changes; Safeguards Contingency Plan, Revision 7

This letter provides the response from Southern California Edison (SCE) to NRC Generic Letter 89-07: "Power Reactor Safeguards Contingency Planning for Surface Vehicle Bombs" for San Onofre Units 1, 2 and 3. As requested by this Generic Letter 89-07, SCE hereby confirms that short-term actions that could be taken to protect against attempted radiological sabotage involving a land vehicle bomb if such a threat were to materialize have been included in San Onofre safeguards contingency planning.

The methodology used for examining the potential vulnerability of San Onofre and developing the defensive contingency planning strategy followed the recommendations of Reference 1 which was provided with the Safeguards Information Addendum to Generic Letter 89-07. This methodology included the following:

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1. The system options used in this evaluation as available to establish and maintain safe shutdown were the options identified and evaluated by the NRC in the Regulatory Effectiveness Review (RER) evaluation report of November 1985. Each system option includes a set of front-line and support systems and is capable of establishing and maintaining a safe shutdown condition in accordance with Reference 1, Section 2.
2. The buildings containing components and equipment associated with each system option were identified by walkdown of the protected and vital areas.
3. Site features were reviewed to evaluate land vehicle access approach paths and possible defensive perimeters. Based on this review, a defensive perimeter was selected to establish standoff distances for evaluation of system option vulnerability. This defensive perimeter generally approximates the site owner controlled area (OCA) boundary west of Interstate Highway 5 (I-5).
4. "Survivability envelopes" for system options were determined by performing a computerized analysis. This analysis confirmed that stopping surface vehicle bombs at the defensive perimeter, given the location of critical system components and the blast resistance of the specific structures which house them, is adequate to ensure safe standoff distances so that at least one system option will survive to ensure safe shutdown.
5. Short-range measures which can be implemented within 12 hours after notification by the NRC to protect against unauthorized vehicle access closer than safe standoff distances were identified.
6. A short-range contingency plan was prepared and advance arrangements have been made to facilitate the short-range contingency measures in the event a land vehicle bomb threat arises. It is understood that the NRC will notify SCE in the event that the threat level changes in a manner which warrants implementation of these contingency measures.

Specific short term actions developed from these evaluations have been included in the San Onofre Safeguards Contingency Plan and were provided to the NRC by Reference 2. In addition, appropriate San Onofre Unit 1 Abnormal Operating Instructions will be revised by December 22, 1989 to require that the following action be completed within 12 hours after notification by the NRC to protect against unauthorized land vehicle access closer than safe standoff distances:

Confirm or establish full operation of systems which are redundant to safe shutdown systems vulnerable to a land vehicle bomb.

If you have any questions or need additional information, please let me know.

Respectfully submitted,

By: *F. R. Nandy*
F. R. Nandy
Manager of Nuclear Licensing

Subscribed and sworn to before me this
27th day of November 1989.

Carol A. Gomez
Notary Public in the State
of California



- cc: J. B. Martin, Regional Administrator, NRC Region V
- E. W. McPeck, Security Specialist, NRC Headquarters Washington, D.C.
- C. W. Caldwell, NRC Senior Resident Inspector (Acting),
San Onofre Units 1, 2 and 3