## APR 2 7 1903

MEMORANDUM FOR: EP File 4-3-1

FROM: Arthur D. McQueen Emergency Preparedness Analyst

SUBJECT: REVISION 5.2 TO THE SONGS EMERGENCY PLAN

The subject revision to the SONGS Emergency Plan was submitted by letter dated December 14, 1992.

The enclosure to this memorandum contains an analysis of the changes submitted in Revision 5.2 to the SONGS Emergency Plan.

The licensee is being notified by letter that the changes appear to meet the provisions of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Arthur D. McQueen Emergency Preparedness Analyst

JE35

Enclosure: Summary and Discussion of Changes in Revision 5.2 to the SONGS Emergency Plan

cc w/enclosure: Docket File 50-392

P111 / .....

REQUEST COPY	SEND TO DCS	SEND TO PDR	
YES/NO40m AMcQueen	(TES/NO	YESINO	
4/z/6/93			

040182

9305060005 930427 PDR ADOCK 05000206 PDR

## ENCLOSURE

 $\mathbf{x}^{(1)}$ 

Summary of Review of the SONGS Emergency Plan, Revision 5.2, dated December 14, 1992.

1. CHANGE: (Section 8.0, Page 8-2) The licensee indicates the word "cask" is replaced by the phrase "diluted liquid grab sample" in the sentence

"The Manager, Site Emergency Preparedness is responsible for the .... biennial PASS <u>cask</u> drill..."

<u>NRC Comment:</u> Change appears consistent with changes below, indicating no substantive impact on emergency preparedness. See also discussion at item 2 below.

2. CHANGE: (Section 8.1.3.5, Page 8-4) The licensee indicates an added sentence which reads:

"This requirement may be satisfied by performing the PASS diluted grab sample described in Section 8.1.3.8."

The requirement referred to states that "Drills involving analysis and sampling of in-plant liquids using post-accident sampling procedures shall be conducted annually for Nuclear Chemistry and Health Physics Technicians."

NRC Comment: This change in PASS sampling was inspected and reviewed by inspectors of the Region V Facilities Radiological Protection Branch during a Chemistry Team Inspection in August, 1992. They concluded that the change was an improvement as regards the public health and safety. The most significant element of the change in procedure is that the licensee no longer has to transport PASS samples to General Atomics (GA) in San Diego, an hour away by freeway. Analysis is now done by Southern California Edison (SCE) at the site. There appears to be no degradation in site emergency preparedness or response resulting from this change.

3. CHANGE: (Section 8.1.3.8, Page 8-4) The licensee indicates the title is changed from "PASS Cask Drill" to "PASS Diluted Liquid Grab Sample." Also, the statement

"At least one drill involving <u>shipment of the PASS cask to an offsite</u> lab for analysis shall be conducted biennially"

has been changed to replace the underlined phrase with "...sampling and analysis of in-plant liquids using the post-accident diluted liquid grab sample procedures...."

<u>NRC Comment:</u> See also the comments for item 2 above. This change is a continuation of the item discussed above and is necessary to make the plan consistent in the two sections. The change therefore appears cosmetic with no substantive impact on emergency preparedness or response.