

UNITED STATES OF AMERICA

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USNRC

NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
SOUTHERN CALIFORNIA EDISON)
COMPANY, et al.)
)
(San Onofre Nuclear Generating)
Station, Units 2 and 3))
_____)

DOCKET NOS. 50-361 OL
50-362 OL

MOTION TO MODIFY LICENSE CONDITION

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San Diego Gas & Electric Company
City of Anaheim, California and
City of Riverside, California

Dated: January 14, 1983.

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
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SOUTHERN CALIFORNIA EDISON)	DOCKET NOS. 50-361 OL
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(San Onofre Nuclear Generating)	
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MOTION TO MODIFY LICENSE CONDITION

Southern California Edison Company, San Diego Gas & Electric Company, City of Riverside, California and City of Anaheim, California ("Applicants"), are licensees under Facility Operating Licenses Nos. NPF-10 and NPF-15, authorized by the above Atomic Safety and Licensing Board ("Board") in its Initial Decision of May 14, 1982 ("Initial Decision"). 15 NRC 1163. Pursuant to 10 CFR § 2.730 and 10 CFR § 50.47(c)(1), Applicants hereby move this Board to modify its Initial Decision to provide an additional six-month period of full power operation for San Onofre Nuclear Generating Station Unit Nos. 2 & 3 ("SONGS 2 & 3") pending final resolution of the offsite medical services issue.

I

Procedural Background

The Initial Decision of May 14, 1982 concluded that Applicants' arrangements for offsite medical services were

not adequate to meet what the Board perceived to be the standards of 10 CFR § 50.47(b)(12). The Board also concluded that full power operation pending development of adequate medical arrangements was not precluded. The Board specifically retained jurisdiction over the medical services issue. 15 NRC 1163 at 1290.

Intervenors filed "Application for Stay of Full Power License", which was denied by the Atomic Safety and Licensing Appeal Board ("ASLAB") on July 16, 1982. ALAB-680, 16 NRC _____.

The Commission declined to review ALAB-680. However, the Commission did note the different interpretations being assigned to 10 CFR § 50.47(b)(12) by this Board and the ASLAB and certified two questions designed to resolve the interpretation of that regulation. Pending a Commission determination of the interpretation to be placed on 10 CFR § 50.47(b)(12), this Board's license condition is to remain in effect. CLI-82-14, 16 NRC _____.

On November 19, 1982, by Memorandum and Order CLI- 82-35, the Commission, in response to this Board's certified question requesting guidance on whether to proceed to hearing pending the Commission's determination of the interpretation of 10 CFR § 50.47(b)(12), instructed this Board to suspend all proceedings until further order of the Commission. The Commission again stated that this Board's license condition remains in effect. 16 NRC _____.

Facility Operating License Nos. NPF-10 and NPF-15 authorize operation of SONGS 2 & 3 for a period of 5 months from the date Unit No. 2 actually exceeds 5% power pending a resolution of the medical services issue. SONGS 2 exceeded 5% power on September 17, 1982 and the five-month license period will expire February 17, 1983.

Inasmuch as proceedings to resolve the offsite medical arrangements issue are suspended and the Commission has not yet issued its interpretation of 10 CFR § 50.47(b)(12), Applicants cannot be assured a resolution of the issue by February 17, 1983.

The present motion is made to allow continued operation of SONGS 2 & 3 pending resolution of the medical services issue.

II

Full Power Operation of SONGS 2 & 3 Will Not Pose Additional Risks To The Public Health and Safety

Applicants submit that full power operation of SONGS 2 & 3 pending resolution of the medical services issue is justified and permissible providing the standards of 10 CFR § 50.47(c)(1) are met. Assuming for purposes of argument only that the requirements of 10 CFR § 50.47(b)(12) have not yet been met, Applicants contend that 10 CFR § 50.47(c)(1) standards are met; the deficiencies articulated by the Board are not significant for continued operation of the units and the medical services currently available constitute adequate

interim compensating measures pending final resolution of the issue. The Board has recognized that the probabilities of a severe accident at SONGS 2 & 3 during any particular short period of time are extremely low and do not significantly endanger the public health and safety. Even assuming the conservative assumptions of Table 7.4 of the Final Environmental Statement, the yearly probability of a 200 rem dose to 2,000 people in the vicinity of SONGS 2 & 3 is less than one in a million. 15 NRC 1163 at 1199. Dr. Ehling, Health Officer for Orange County, testified that at least 2,000 beds would be available in Orange County in the event of an emergency and 31,000 exposures could be accommodated on an area-wide, i.e., southern California, basis. (Tr. 9992-9994) It is also uncontroverted that in the event of excessive radiation, time is not an emergency matter. (Tr. 7087-88, 7102-03, 7109, 7718-19, 9979, 10277-78, 10843-44) Applicants submit that in the event of a very low probability but severe accident, there would be ample time to take advantage of existing medical facilities which are adequate to handle the postulated number of excessive doses.

Given the uncontroverted testimony that hospitalization for an excessive dose of radiation is not required on an emergency basis and the fact that there would be literally thousands of hospital beds available to provide necessary treatment, the lack of specific arrangements with

the various hospitals is not significant to continued safe operation of SONGS 2 & 3.

Applicants have specific arrangements with three hospitals in the area of San Onofre and Orange County has emergency arrangements with thirteen hospitals. Applicants Ex. 53 at V-39; Tr. 7107-09. Assuming such are not the type of specific arrangements required under 10 CFR § 50.47(b)(12), Applicants contend they constitute adequate interim compensating measures within the meaning of 10 CFR § 50.47(c)(1).

III

Conclusion

Unless modified, Facility Operating License Nos. NPF-10 and NPF-15 issued by the Director, Nuclear Reactor Regulation, do not authorize operation of SONGS 2 & 3 beyond February 17, 1983. Concurrent with this motion, Applicants are submitting to the Director, Nuclear Reactor Regulation, License Amendment Applications seeking authorization to continue full power operation of SONGS 2 & 3 to August 17, 1983. (Copies of License Amendment Applications are attached.) Said applications are being submitted in order that the Director have before him all documentation necessary to act as requested by February 17, 1983.

Applicants hereby move this Board to amend its Initial Decision of May 14, 1982 to allow an additional

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON)	
COMPANY, <u>ET AL.</u> for a Class 103 license to)	DOCKET NO. 50-362
Acquire, Possess, and Use a Utilization)	
Facility as Part of Unit No. 3 of the San)	Amendment Application
Onofre Nuclear Generating Station)	No. 3

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 3.

This amendment application consists of Proposed Change NPF-15-63 to Facility Operating License No. NPF-15. Proposed Change NPF-15-63 is a request to revise Section 2.C.(18) of Operating License NPF-15. The proposed change seeks to defer the date to provide plans demonstrating that SCE and offsite jurisdictions have developed and stand ready to implement arrangements for medical services for members of the offsite public.

Pursuant to 10 CFR 170.22, Proposed Change NPF-15-63 contained in Amendment Application No. 3 is considered to constitute a Class I Amendment. The basis for the determination is that this amendment is a duplicate of Amendment Application No. 17 to Operating License No. NPF-10 for Unit No. 2 at San Onofre Nuclear Generating Station.

Accordingly, the fee of \$400.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this 14th day of January, 1983.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: /s/ Robert Dietch

Robert Dietch
Vice President

Subscribed and sworn to before me this

14th day of January, 1983.

/s/ Mollyann Wong
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Nov. 9, 1984

Charles R. Kocher
James A. Beoletto
Attorneys for Southern
California Edison Company

By: /s/ James A. Beoletto
James A. Beoletto

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ G.D. Cotton

David R. Pigott
Samuel B. Casey
Orrick, Herrington & Sutcliffe
Attorneys for San Diego
Gas & Electric Company

By: /s/ David R. Pigott

Subscribed and sworn to before me this
12th day of January 1983.

/s/ Julie F. Kellam
Notary Public in and for the City
and County of ~~San Diego~~, California
Los Angeles

THE CITY OF ANAHEIM

By: /s/ Gordon W. Hoyt
GORDON W. HOYT

Alan R. Watts
Rourke & Woodruff
Attorneys for the City of Anaheim

By: /s/ Alan R. Watts

Subscribed and sworn to before me this
10 day of Jan. 1983.

/s/ J. Richard Santo
Notary Public in and for the County
of Orange, State of California

THE CITY OF RIVERSIDE

By: /s/ Everett C. Ross
EVERETT C. ROSS

Alan R. Watts
Rourke & Woodruff
Attorneys for the City of Riverside

By: /s/ Alan R. Watts

Subscribed and sworn to before me this
10 day of Jan. 1983.

/s/ J. Richard Santo
Notary Public in and for the County of
Orange, State of California

DESCRIPTION OF PROPOSED CHANGE NPF-15-63 AND SAFETY ANALYSIS
OPERATING LICENSE NPF-15

This is a request to revise Section 2.C.(18) of Facility Operating License NPF-15.

Existing Condition

Section 2.C.(18) Emergency Preparedness Conditions

(18) Emergency Preparedness Conditions

a. Conditions of ASLB Initial Decision of May 14, 1982

By February 17, 1983, SCE shall:

1. Provide evidence that both meteorological towers and the Health Physics Computer System are fully installed and operational. SCE shall maintain offsite assessment and monitoring capabilities, essentially as described in the hearing (see initial Decision, Section IV, Paragraph D.1-12, pp. 136-140), at no less than that level of readiness, pending development of satisfactory capability of offsite response Paragraph D.27, pp. 145-146, and Section V, Paragraph B, pp. 213-214).
2. Provide an assessment of whether public information regarding emergency planning should also be presented in Spanish (see Initial Decision, Section IV, Paragraph F.32, pp. 168, and Section V, Paragraph C.2, pp. 215).
3. Provide plans demonstrating that SCE and offsite jurisdictions have developed and stand ready to implement arrangements for medical services for members of the offsite public. Documentation of the arrangements and provisions made shall be provided to the Atomic Safety and Licensing Board as well as to the NRC staff (see Initial Decision, Section III, pp. 43-47, and Section V, Paragraph D, pp. 216-217).
4. Provide revised plans demonstrating that the "extended" Emergency Planning Zone (EPZ) concept has been deleted from the San Onofre onsite and offsite plans and the Plume Exposure Pathway EPZ boundary has been extended, along with siren coverage, to Dana Point and all of San Juan Capistrano (see Initial Decision, Section IV, Paragraph D.25, pp.98, and Section V, Paragraph C.5, pp 216; see also Order (Making Clarifying Change in Initial Decision) dated May 25, 1982).

b. Completion of Emergency Preparedness Requirements

In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's proposed rules, 44 CFR 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of preparedness, the provisions of 10 CFR 50.54(s)(2) will apply.

Proposed Change

Section 2.C(18) Emergency Preparedness Conditions

(18) Emergency Preparedness Conditions

a. Conditions of ASLB Initial Decision of May 14, 1982

By February 17, 1983, SCE shall:

1. Provide evidence that both meteorological towers and the Health Physics Computer System are fully installed and operational. SCE shall maintain offsite assessment and monitoring capabilities, essentially as described in the hearing (see Initial Decision, Section IV, Paragraph D.1-12, pp. 136-140), at no less than that level of readiness, pending development of satisfactory capability of offsite response organizations (see Initial Decision, Section IV, Paragraph D.27, pp. 145-146, and Section V, Paragraph B, pp. 213-214).
2. Provide an assessment of whether public information regarding emergency planning should also be presented in Spanish (see Initial Decision, Section IV, Paragraph F.32, pp. 168, and Section V, Paragraph C.2, pp. 215).
3. Provide revised plans demonstrating that the "extended" Emergency Planning Zone (EPZ) concept has been deleted from the San Onofre onsite and offsite plans and the Plume Exposure Pathway EPZ boundary has been extended, along with siren coverage, to Dana Point and all of San Juan Capistrano (see Initial Decision, Section IV, Paragraph D.25, pp. 98, and Section V, Paragraph C.5, pp. 216; see also Order (Making Clarifying Change in Initial Decision) dated May 25, 1982).

b. Completion of Emergency Preparedness Requirements

In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's proposed rules, 44 CFR 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of preparedness, the provisions of 10 CFR 50.54(s)(2) will apply.

c. Provide Medical Services Plans

By August 17, 1983, SCE shall provide plans demonstrating that SCE and offsite jurisdictions have developed and stand ready to implement arrangements for medical services for members of the offsite public. Documentation of the arrangements and provisions made shall be provided to the Atomic Safety and Licensing Board as well as to the NRC staff (see Initial Decision, Section III, pp. 43-47, and Section V, Paragraph D, pp. 216-217).

Reason for Proposed Change

SCE is seeking to defer the date to provide plans demonstrating that SCE and offsite jurisdictions have developed and stand ready to implement arrangements for medical services for members of the offsite public for the following reasons:

1. The Initial Decision of the Atomic Safety and Licensing Board (Board) of May 14, 1982 concluded that arrangements for medical services were not adequate to meet what the Board perceived to be the standards of 10 CFR 50.47(b)(12). The Board also concluded that full power operation pending development of adequate medical arrangements was not precluded. The Board specifically retained jurisdiction over the medical services issue.
2. The Commission noted the different interpretations being assigned to 10 CFR 50.47(b)(12) by the Board and the Atomic Safety and Licensing Appeal Board (ASLAB) and certified two questions designed to resolve the interpretation of that regulation. Pending a Commission determination of the interpretation to be placed on 10 CFR 50.47(b)(12), the Board's license condition is to remain in effect.
3. On November 19, 1982, by Memorandum and Order, the Commission, in response to the Board's certified question requesting guidance on whether to proceed to hearing pending the Commission's determination of the interpretation of 10 CFR 50.47(b)(12), instructed the Board to suspend its proceedings until further order of the Commission. The Commission again stated that the Board's condition remains in effect.
4. Inasmuch as proceedings to resolve the medical arrangements issue are suspended and the Commission has not yet issued its interpretation of 10 CFR 50.47(b)(12), SCE cannot be assured a resolution of the issue by February 17, 1983.
5. The proposed change will allow continued operation of SONGS 3 pending resolution of the medical services issue.

Safety Analysis

The proposed change defers the resolution date for the medical services issue. The original timing that was established by the Board for these conditions, was assumed to be sufficient to resolve this issue, even with the possibility that a public hearing would be required. However, inasmuch as proceedings to resolve the medical services issue are suspended and the Commission has not yet issued its interpretation of 10 CFR 50.47(b)(12), additional time is needed for resolution of this issue. Operation of SONGS 3 pending resolution of the medical services issue is justified and permissible providing the standards of 10 CFR 50.47(c)(1) are met. 10 CFR 50.47(c)(1) standards are met; the deficiencies articulated by the Board are not significant for continued operation of the plant and the medical services currently available constitute adequate interim compensating measures pending final resolution of the issue.

Accordingly, it is concluded that: (1) Proposed Change NPF-15-63 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station or the environment as described in the NRC Final Environmental Statement.

DLC:6742

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON)	
COMPANY, <u>ET AL.</u> for a Class 103 license to)	DOCKET NO. 50-361
Acquire, Possess, and Use a Utilization)	
Facility as Part of Unit No. 2 of the San)	Amendment Application
Onofre Nuclear Generating Station)	No. 17

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 17.

This amendment application consists of Proposed Change NPF-10-63 to Facility Operating License No. NPF-10. Proposed Change NPF-10-63 is a request to revise Section 2.C.(23) of Operating License NPF-10. The proposed change seeks to defer the date to provide plans demonstrating that SCE and offsite jurisdictions have developed and stand ready to implement arrangements for medical services for members of the offsite public.

Pursuant to 10 CFR 170.22, Proposed Change NPF-10-63 contained in Amendment Application No. 17 is considered to constitute a Class II Amendment. The basis for the determination is that this change is administrative in nature and has no safety or environmental significance.

Accordingly, the fee of \$1,200.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this 14th day of January, 1983.

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

By: /s/ Robert Dietch
Robert Dietch
Vice President

Subscribed and sworn to before me this
14th day of January, 1983.

/s/ Mollyann Wong
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Nov. 9, 1984

Charles R. Kocher
James A. Beoletto
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By: /s/ James A. Beoletto
James A. Beoletto

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ G.D. Cotton

David R. Pigott
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Attorneys for San Diego
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By: /s/ David R. Pigott

Subscribed and sworn to before me this
12th day of January 1983.

/s/ Julie F. Kellam
Notary Public in and for the City
and County of ~~San Diego~~, California
Los Angeles

THE CITY OF ANAHEIM

By: /s/ Gordon W. Hoyt
GORDON W. HOYT

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Attorneys for the City of Anaheim

By: /s/ Alan R. Watts

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THE CITY OF RIVERSIDE

By: /s/ Everett C. Ross
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By: /s/ Alan R. Watts

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/s/ J. Richard Santo
Notary Public in and for the County of
Orange, State of California

DESCRIPTION OF PROPOSED CHANGE NPF-10-63 AND SAFETY ANALYSIS
OPERATING LICENSE NPF-10

This is a request to revise Section 2.C.(23) of Facility Operating License NPF-10.

Existing Condition

Section 2.C.(23) Emergency Preparedness Conditions

(23) Emergency Preparedness Conditions

a. Conditions of ASLB Initial Decision of May 14, 1982

Within five (5) months of initially exceeding five (5) percent power, SCE shall:

- i. Demonstrate that both meteorological towers and the Health Physics Computer System are fully installed and operational. SCE shall maintain offsite assessment and monitoring capabilities, essentially as described in the hearing (see Initial Decision, Section IV, Paragraph D1.12, pp. 136-140), at no less than that level of readiness, pending development of satisfactory capability of offsite response organizations (see Initial Decision, Section IV, Paragraph D.27, pp. 145-146, and Section V, Paragraph B, pp. 213-214).
- ii. Provide an assessment of whether public information regarding emergency planning should also be presented in Spanish (see Initial Decision, Section IV, Paragraph F.32, pp. 168, and Section V, Paragraph C.2, pp. 215).
- iii. Provide plans demonstrating that SCE and offsite jurisdictions have developed and stand ready to implement arrangements for medical services for members of the offsite public. Documentation of the arrangements and provisions made shall be provided to the Atomic Safety and Licensing Board as well as to the NRC staff (see Initial Decision, Section III, pp. 43-47, and Section V, Paragraph D, pp. 216-217).
- iv. Provide revised plans demonstrating that the "extended" Emergency Planning Zone (EPZ) concept has been deleted from the San Onofre onsite and offsite plans and the Plume Exposure Pathway EPZ boundary has been extended, along with siren coverage, to Dana Point and all of San Juan Capistrano (see Initial Decision, Section IV, Paragraph D.25, pp.98, and Section V, Paragraph C.5, pp 216; see also Order (Making Clarifying Change in Initial Decision) dated May 25, 1982).

b. Completion of Emergency Preparedness Requirements

In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's proposed rules, 44 CFR 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of preparedness, the provisions of 10 CFR 50.54(s)(2) will apply.

Proposed Change

Section 2.C(23) Emergency Preparedness Conditions

(23) Emergency Preparedness Conditions

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By August 17, 1983, SCE shall provide plans demonstrating that SCE and offsite jurisdictions have developed and stand ready to implement arrangements for medical services for members of the offsite public. Documentation of the arrangements and provisions made shall be provided to the Atomic Safety and Licensing Board as well as to the NRC staff (see Initial Decision, Section III, pp. 43-47, and Section V, Paragraph D, pp. 216-217).

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1. The Initial Decision of the Atomic Safety and Licensing Board (Board) of May 14, 1982 concluded that arrangements for medical services were not adequate to meet what the Board perceived to be the standards of 10 CFR 50.47(b)(12). The Board also concluded that full power operation pending development of adequate medical arrangements was not precluded. The Board specifically retained jurisdiction over the medical services issue.
2. The Commission noted the different interpretations being assigned to 10 CFR 50.47(b)(12) by the Board and the Atomic Safety and Licensing Appeal Board (ASLAB) and certified two questions designed to resolve the interpretation of that regulation. Pending a Commission determination of the interpretation to be placed on 10 CFR 50.47(b)(12), the Board's license condition is to remain in effect.
3. On November 19, 1982, by Memorandum and Order, the Commission, in response to the Board's certified question requesting guidance on whether to proceed to hearing pending the Commission's determination of the interpretation of 10 CFR 50.47(b)(12), instructed the Board to suspend its proceedings until further order of the Commission. The Commission again stated that the Board's condition remains in effect.
4. Inasmuch as proceedings to resolve the medical arrangements issue are suspended and the Commission has not yet issued its interpretation of 10 CFR 50.47(b)(12), SCE cannot be assured a resolution of the issue by February 17, 1983, which is 5 months from September 17, 1982, the date that SONGS 2 actually exceeded 5% power.
5. The proposed change will allow continued full power operation of SONGS 2 pending resolution of the medical services issue.

Safety Analysis

The proposed change defers the resolution date for the medical services issue. The original timing that was established by the Board for these conditions, was assumed to be sufficient to resolve this issue, even with the possibility that a public hearing would be required. However, inasmuch as proceedings to resolve the medical services issue are suspended and the Commission has not yet issued its interpretation of 10 CFR 50.47(b)(12), additional time is needed for resolution of this issue. Full power operation of SONGS 2 pending resolution of the medical services issue is justified and permissible providing the standards of 10 CFR 50.47(c)(1) are met. 10 CFR 50.47(c)(1) standards are met; the deficiencies articulated by the Board are not significant for continued operation of the plant and the medical services currently available constitute adequate interim compensating measures pending final resolution of the issue.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-63 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station or the environment as described in the NRC Final Environmental Statement.

DLC:6740

DECLARATION OF SERVICE BY MAIL

I am over the age of eighteen years and not a party to the above-entitled cause. My business address is 600 Montgomery Street, 12th Floor, San Francisco, California 94111.

I served the foregoing MOTION TO MODIFY LICENSE CONDITION dated January 14, 1983, by depositing a true copy thereof enclosed in the United States mail, first class (or by Express Mail, where asterisked) at San Francisco, California, on January 14, 1983, enclosed in a sealed envelope with postage thereon fully prepaid, addressed as follows:

Stephen F. Eilperin, Esq.
Chairman, Atomic Safety and
Licensing Appeal Board
U.S. Nuclear Regulatory Commission
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James L. Kelley, Chairman
Administrative Judge
Atomic Safety and Licensing Board
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Washington, D.C. 20555

Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Executed on January 14, 1983, in the City and
County of San Francisco, State of California.

I declare under penalty of perjury that the
foregoing is true and correct.

KAREN ANDRESEN