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ROBERT DIETCH
VICE PRESIDENT

March 4, 1983

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. R. H. Engelken, Regional Administrator

Dear Sir:

Subject: Docket Numbers 50-206, 50-361, 50-362
IE Inspection Report Nos. 50-206/83-03, 50-361/83-04,
50-362/83-05
Response to Notice of Violation
San Onofre Nuclear Generating Station, Units 1, 2 and 3

Reference: Letter, K. P. Baskin (SCE) to R. H. Engelken (NRC), Special
Report on Land Use Census Results, dated January 28, 1983

Mr. H. E. Book's letter of February 4, 1983, issued IE Inspection
Report 50-206/83-03, 50-361/83-04, 50-362/83-05 and forwarded a Notice of
Violation resulting from the January 17-21, 1983, Units 1, 2 and 3 routine
inspection conducted by G. Yuhas.

The enclosure to this letter provides our response to the Notice of
Violation contained in Appendix A to Mr. Book's letter.

Our review of the facts in this instance raises the question of whether
the discovery of State Parks' employees living temporarily in camping trailers
constitutes a circumstance requiring the calculation of doses from airborne
effluents at this new location. As discussed below, we feel the facts in this
case do not justify taking such action:

1. Technical Specification 3.12.2 is intended to fulfill the
requirements set forth in the regulations at 10 CFR 50,
Appendix I, Section IV.B.3 which states:

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"B. The licensee shall establish an appropriate surveillance and monitoring program to:

"3. Identify changes in the use of unrestricted areas (e.g., for agricultural purposes) to permit modifications in monitoring programs for evaluating doses to individuals from principal pathways of exposure."

*See C. we
you tell us
not.*

We believe that with only a few individuals so located, their presence should be much more permanent than in this instance to constitute "changes" in the context of the regulations. However, if there were more than a few people there (especially if family groups were present), even given the transitory nature of the living conditions found in the case at hand, it is possible that someone there might experience a high occupancy factor which would correspond to the calculations performed for doses via this pathway. In this latter example, we believe this would be a threshold case of a "change" requiring ODCM revision, etc. However, based on discussions with State Parks' Management, the one or two individuals in this case were present at the location in question for limited periods (probably less than the average office worker at San Onofre). BS

2. Whereas the Land Use Census stated that the location was a distance of ".38 miles from the site," the actual distance from the point of release of gaseous effluents used for the purposes of calculating doses in the Offsite Dose Calculation Manual (ODCM) would have been .57 miles in this case. The closest pathway analogy given in the ODCM for this sector is identified as "family housing" shown at a distance of 1.8 miles. For the "family housing" pathway, doses to the total body and skin are calculated based upon noble gases, and doses to the total body and various organs are calculated due to inhalation, food ingestion, and ground deposition of the other isotopes for infant, child, teen and adult receptors. In the case at hand, revising the family housing pathway because of one or two adults living in temporary camping circumstances (at the closer distance) would be inappropriate. A new pathway could be created instead (consisting of adult receptors only) in which the atmospheric dispersion factors would be higher to account for the closer distance but offset by the limited occupancy which in this case could have been less than 20%. The result is likely to be doses not appreciably greater than the adult dose via the established "family housing" pathway and perhaps less than the infant thyroid dose due to iodine inhalation.

*How did my
get 20%*

- 3. There are no longer any individuals in temporary residence at this location, and based on discussions with State Parks' Management, similar incidents are not expected to recur.

Because of the foregoing, we have concluded that the facts in this case do not equate with the criteria for ACTION (a) given in Technical Specification 3.12.2. Given the time required to prepare this response, the corrective action described in the enclosure also addresses steps to be taken to ensure that in the future if the Land Use Census identifies defined changes in the use of unrestricted areas near SONGS, the required reports will be timely submitted.

If you require any additional information, please so advise.

Sincerely yours,

Robert Dietrich

Enclosure

- cc: L. Miller (USNRC Resident Inspector - San Onofre, Unit 1)
- A. Chaffee (USNRC Resident Inspector - San Onofre, Units 2,3)
- R. Pate (USNRC Resident Inspector - San Onofre, Units 2,3)

D. — Fargary (Ray)
No change up down — without Station concurren

— New letter Dietrich —
See letter on Resolution

2) HPBS - Friday

3) — Aux Bldg Pool
200 gal — Small Pool
Roof drain —
RWST —
No cat 2-3
per fire hose

ENCLOSURE

Response to the Notice of Violation contained in Appendix A to Mr. H. E. Book's letter dated February 4, 1983

ITEM

Appendix A to Mr. Book's letter states:

"Technical Specification 3.12.2, LAND USE CENSUS requires in part that: 'With a land use census identifying a location(s) which yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the new location(s).'

"Contrary to this requirement, the land use census dated November 12, 1982 identified a near site resident, (located at 0.38 miles Northwest) which would receive a calculated dose about four times greater than the resident identified by the Offsite Dose Calculation Manual (Table 2-6, 1.8 miles Northwest) and a Special Report had not been submitted as of January 21, 1983.

"This is a Severity Level V Violation (Supplement 1)."

RESPONSE

Corrective Steps Which Have Been Taken and the Results Achieved

SCE provided the Special Report pursuant to Technical Specifications 3.12.2.a and 6.9.2 on January 28, 1983.

SCE management provided internal written direction to the responsible organizations which address the scheduling of land use census work, the requirement of outside contractors to more fully understand the purpose of their work, the circumstances which constitute significantly changed conditions, and the requirement to involve management when problems are discovered in order to take effective corrective measures and make timely reports to the NRC.

Corrective Steps Which Will Be Taken To Avoid Further Items of Noncompliance

Future land use census work will be initiated as soon as practicable after June 1 of each year. This requirement will be reflected in procedures governing the land use census prior to commencement of the next census. Future Land use census results will be reviewed and approved early enough to make reports to the NRC within 30 days of receipt of the Land use census results.

Date When Full Compliance Will Be Achieved

Full compliance was achieved by the relocation of the single individual involved in this case and the submittal of the Special Report on January 28, 1983. Procedures will be amended as identified above by the time the 1983 Land Use Census is initiated.

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS

LIMITING CONDITION FOR OPERATION

3.12.2 A land use census shall be conducted and shall identify the location of the nearest milk animal, the nearest residence and the nearest garden* of greater than 500 square feet producing fresh leafy vegetables in each of the 16 meteorological sectors within a distance of five miles. For elevated releases as defined in Regulatory Guide 1.111, Revision 1, July 1977, the land use census shall also identify the locations of all milk animals and all gardens of greater than 500 square feet producing fresh leafy vegetables in each of the 16 meteorological sectors within a distance of three miles.

APPLICABILITY: At all times.**

ACTION:

- a. With a land use census identifying a location(s) which yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3, in lieu of any other report required by Specification 6.9.1., prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the new location(s).
- b. With a land use census identifying a location(s) which yields a calculated dose or dose commitment via the same exposure pathway 20 percent greater than at a location from which samples are currently being obtained in accordance with Specification 3.12.1, in lieu of any other report required by Specification 6.9.1, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the new location. The new location shall be added to the radiological environmental monitoring program within 30 days. The sampling location, excluding the control station location, having the lowest calculated dose or dose commitment via the same exposure pathway may be deleted from this monitoring program after October 31 of the year in which this land use census was conducted.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.2 The land use census shall be conducted at least once per 12 months between the dates of June 1 and October 1 using that information which will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities.

* Broad leaf vegetation sampling may be performed at the site boundary in the direction sector with the highest D/Q in lieu of the garden census.