

NOTATION VOTE

RESPONSE SHEET

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER AHEARNE

SUBJECT: SECY-82-63 - DIRECTOR'S DENIALS OF 2.206 RELIEF (IN THE MATTER OF SOUTHERN CALIFORNIA EDISON COMPANY): DD-81-19 AND DD-81-20

APPROVED : X DISAPPROVED \_\_\_\_\_ ABSTAIN \_\_\_\_\_  
NOT PARTICIPATING \_\_\_\_\_ REQUEST DISCUSSION \_\_\_\_\_

COMMENTS:

*See attached*

8306070028 830405  
PDR FOIA  
WHARTON82-611 PDR

*J. Ahearne*  
SIGNATURE  
5/3/82  
DATE

SECRETARIAT NOTE: PLEASE ALSO RESPOND TO AND/OR COMMENT ON OGC/OPE MEMORANDUM IF ONE HAS BEEN ISSUED ON THIS PAPER.

Mr. Ahearne's comments on Secy-82-63:

The letters from FEMA received subsequent to the Director's decision support the description in that decision. Therefore, I agree with not reviewing the Director's Decision.

However, the Director's decision and the SER identified several open issues. Since the decision, difficulties in resolving some of these issues and additional problems have arisen that the staff is addressing. Consequently, I would be interested in the EDO informing the Commission which issues must reach what stage of resolution prior to allowing SONGS 1 to restart.

One other area does concern me:

Portions of the Turbine Building Complex were originally designed as Category B structures, although they contained systems and components necessary for safe shutdown and accident mitigation and thus should have been Category A. The misclassification of the Turbine Building Complex is troubling. I recognize that it has not been demonstrated there were pervasive errors. I also recognize we often apply different standards to operating reactor licensees (particularly SEP plants) than to new licensees. However, I tend to believe there is a basis for looking further at the possibility there may be other major errors at San Onofre 1.

It is difficult to understand how Bechtel made the mistake and then failed to discover it. The error was at a basic level of conceptual design, not buried in some detailed calculations. The mistake was clear as opposed to arguable. It involved a relatively straightforward application of criteria rather than engineering judgment. It was significant rather than trivial since (in combination with other deficiencies), among other things, it endangered all methods for providing water to remove reactor decay heat.

Given the nature of the error and the fact that there have been difficulties in the past with errors in design and construction of Bechtel plants (e.g., Trojan and Midland), has the staff considered any course of action to assure there are no other significant errors? If so, what was the staff's decision?



OFFICE OF THE  
COMMISSIONER

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

September 24, 1982

*Response received  
11/2/82*

MEMORANDUM FOR: Executive Director for Operations  
FROM: John Ahearne *J. Ahearne*  
SUBJECT: SAN ONOFRE UNIT 1

On July 22nd you responded to a June 18th memo requesting a response to my comments on the Director's Denial of 2.206 relief (Secy 82-63). Specifically you addressed the question I had with respect to the categorization of portions of the turbine building complex as Category B, although they should have been Category A (my judgment). Your answer states:

"The classification of the turbine building complex as Category B structures was consistent with prevailing industrial and regulatory practices at the time the San Onofre design was conceived."

I would appreciate answers to the following questions:

1. Does the staff agree that these portions of the turbine building complex should be Category A-- that is, does the staff agree that they contain systems and components necessary for safe shutdown and accident mitigation and thus, should be Category A?
  - (a) If the answer is no, please explain.
  - (b) If the answer is yes, then I have a second question.
2. Does the quoted statement above in your answer mean that prevailing practice both in the industry and in the AEC was not to require equipment that would be necessary for a safe shutdown to have Category A protection? If that is the case and if we now believe it should, then what is the staff program to review other plants designed and approved in this era to assure that they too don't have similar problems?

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DAR*

The document control system shows a May 10, 1982 draft SER on the seismic design of San Onofre Unit 1 and comments from various divisions, but no final SER. I recognize that events since the publication of this draft have changed staff's program of review. However, I would appreciate receiving answers to the following questions:

1. Is there a revised draft SER or a final SER, and if so, is it available?
2. If not, what is your schedule for making such available?
3. What are the acceptance criteria for restart which the staff intends to use? These become particularly important in light of the following statements in the May 10 draft SER:
  - (a) "The licensee...refused to perform the additional time history analysis." (p. 8)
  - (b) "The staff is unable to conclude that the main reactor coolant system piping and components are adequately supported for design for a 0.67g Housner SSE." (p. 9)
  - (c) "Therefore, function of the CVCS [Chemical Volume Control System] would be lost at 0.67g Housner." (p. 9)
  - (d) "Safety injection system integrity, therefore, cannot be assured." (p. 11)
  - (e) "RHR, CCW and spent fuel pool cooling systems function cannot be assured." (p. 12)
  - (f) "We consider the licensee statement that small diameter piping will never fail, regardless of the loads applied, to be unfounded and without basis." (p. 19)
  - (g) "...It is not possible to reach any conclusion concerning the adequacy of the original seismic design of Emergency Core Cooling Systems at San Onofre Unit 1." (p. 24)

cc: Chairman Palladino  
 Commissioner Gilinsky  
 Commissioner Roberts  
 Commissioner Asselstine  
 Secy  
 OPE  
 OGC