

## NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001 April 30, 1996

Mr. Glen R. Mills P.O. Box 3393 Mission Viejo, CA 92690

Dear Mr. Mills:

I am responding to the letter you sent to Chairman Jackson on March 25, 1996. In your letter, you ask the U.S. Nuclear Regulatory Commission (NRC) to require Southern California Edison (the licensee for the San Onofre Nuclear Generating Station (SONGS), Units 1, 2, and 3) to immediately construct a leakproof containment around all spent fuel storage facilities on site to the same technical specifications as the original Unit 1 and Units 2/3 primary containments. You also request that all spent fuel production on site be terminated. You base your requests on documents in your possession showing that there have been leaks from the spent fuel pool at SONGS and that, on at least one occasion, the beach has been contaminated with radioactive material.

Your March 25, 1996, letter referred to beach contamination with radioactive material. The only known instance of beach contamination was discovered by the licensee on May 10, 1981, and the NRC was verbally notified the next day. The beach contamination was discovered during excavation work associated with a beach walkway and all the contamination was on the licensee's leased property boundary. The contamination came from an out-of-service storm drainline that penetrated the Unit 1 seawall, and it was uncovered during the excavation process. The source of the contamination in the storm drain is believed to have been the chronic flow of small amounts of contaminated liquid from various Unit 1 plant systems which had the potential to reach the yard drain system (during heavy rain storms, for example). The measured background dose before excavation was 12 µR/hour, and the contact dose was 200 µR/hour. This pre-excavation value was well below 10 CFR Part 20 dose limits established for the protection of the general public. The licensee shipped 21,900 cubic feet of contaminated material with an estimated total activity of 8.5 mCi to the Richland, Washington, burial site, and the licensee acted to prevent the yard drain system from draining onto the beach. These actions included capping various drain openings with cement and modifying the yard drain system so that contents of the drain sump are analyzed for radioactivity prior to discharge to the ocean. In addition, the licensee routinely conducts beach radiation surveys to gain additional assurance that no unexpected risks to the public will occur.

Your letter also referred to leaks in the spent fuel pool at SONGS.
Unprocessed leakage from the Units 2 and 3 spent fuel pools have not been reported to the NRC. However, on several occasions the Unit 1 spent fuel pool has leaked, starting in 1986, when water leaked through the liner and filled the leakage collection system and leakage detection well. Although some of this leakage bypassed the normal processing system designed to filter out radioactive material before any release is made to the environment, no violations of 10 CFR Part 20 dose limits to the public were identified from this event or from any of the other Unit 1 spent fuel pool leaks. In 1994,

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the NRC staff conducted a special inspection of the Unit 1 spent fuel storage systems to ensure that the licensee was safely storing spent fuel. The staff concluded that licensee programs effectively ensured the safety of spent fuel and prevented degradation of spent fuel storage systems. For your convenience, I have enclosed three documents related to this effort.

After conducting extensive inspections and design reviews, the NRC staff concludes that the spent fuel storage systems and buildings at the SONGS units are in compliance with the applicable Federal regulations, and that the actions requested in your letter are not needed to assure continued safe operation of Units 2 and 3, and continued safe storage of spent fuel in the Unit 1 spent fuel storage facility.

We appreciate that you share your concerns on the safety of nuclear power. The NRC staff takes seriously its duty to protect the health and welfare of the public, which includes free and open communications with concerned citizens.

Sincerely,

Original Signed By

Jack W. Roe, Director Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket No. 50-361 and 50-362

Enclosures: 1. Inspection Report 50-205/94-23

2. SCE Letter to NRC dtd. 3/10/95 3. NRC Letter to SCE dtd. 1/11/96

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DOCUMENT NAME: ED096195.GT \*See Previous Concurrence

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