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June 16, 1997



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONAL Company

F. S. Modling

Manager, Regulatory Projects

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U.S. Nuclear Regulatory Commission
Rules Review and Directives Branch
Office of Administration
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Rockville, MD 20852-2738

Gentlemen,

Subject: Comments on Draft Regulatory Guide DG-1067
San Onofre Nuclear Generating Station
Units 1, 2, and 3

Southern California Edison Company (Edison) hereby offers comments on DG-1067, "Decommissioning of Nuclear Power Reactors" which was noticed in the Federal Register on June 16, 1997. Edison supports the Nuclear Energy Institute's (NEI) comments as a member of NEI, especially NEI's recommendation to postpone issuance of the Regulatory Guide until the industry decommissioning guideline initiative is completed by NEI. These comments are supplementary to NEI's comments and do not attempt to reiterate comments already made by NEI.

I. The Draft Regulatory Guide Should Clarify That Decommissioning Trust Funds Exceeding the Levels Specified in 10 CFR 50.75 May Be Used For Dry Cask Storage

On Page 8, in the last paragraph, the Draft Regulatory Guide states the following:

"However, decommissioning trust funds should not be used for the maintenance and storage of spent fuel in the spent fuel pool, or for the design or construction of spent fuel dry storage facilities, or for other activities not directly related to the long-term storage, radiological decontamination or dismantlement of the facility, or decontamination of the site."

The draft Regulatory Guide should be modified to clarify that the discussion of decommissioning trust funds refers only to those funds the utility must collect in accordance with 10 CFR 50.75. The utility may collect additional decommissioning trust funds as they deem necessary for safe storage of a

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shutdown unit. These additional decommissioning funds may be used to maintain the unit in safe storage, to build a dry cask storage facility, to store fuel in another pool, or to restore the site to its original condition.

II. Utilities should be Able to Make Minor Changes to Permanently Shutdown Facilities That Facilitate Decommissioning Without NRC Approval

In Section 8.2, Maintenance of the Final Safety Analysis Report, the Draft Regulatory Guide states the following:

"For permanently shutdown facilities that have not maintained their FSAR or comparable document (i.e., Final Hazards Summary Report or Decommissioning Safety Analysis Report), the licensee is prohibited from using the 10 CFR 50.59 evaluation process to make changes to the facility."

Major decommissioning, as defined in 50.2, should not be allowed prior to the updating of the FSAR or comparable document. However, utilities should be allowed to make changes to facilitate decontamination and dismantling without NRC approval as long as the requirements of 10 CFR 50.59 are satisfied. The draft Regulatory Guide should be modified to be consistent with the following language in the NRC's October 23, 1992 letter which issued the amendment revising Edison's operating license for San Onofre Unit 1 to an operating (possession only) license.

"Although the NRC must approve the decommissioning alternative and major structural changes to radioactive components of the facility, Southern California Edison Company may proceed with activities after the POL becomes effective (such as additional decontamination, component disassembly, and shipment and storage of spent fuel), if these activities: (1) are permitted by the POL and 10 CFR 50.59, and (2) do not materially and demonstrably affect the methods or options available for decommissioning or substantially increase the cost of decommissioning."

Edison's Decommissioning Plan, submitted on November 3, 1994, indicated that changes to the facility would be implemented without NRC approval as long as the change did not involve a change to the technical specifications or an unreviewed safety question. Salvaging of equipment, removal of equipment for safety reasons, or dismantlement and shipment of equipment to a burial site

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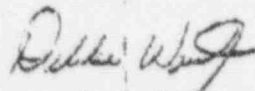
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are activities that can occur prior to the FSAR or comparable document being updated. These activities should be allowed so long as they comply with 10 CFR 50.59.

If you have any questions regarding these comments, please let me know.

Sincerely,



For E. S. Medling
Manager, Regulatory Projects

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
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