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SUBJECT: Application for amends to Licenses ^{see R-15} NPF-10 & NPF-15,
 consisting of Proposed Change PCN-236 to revise Tech Spec
 6.9.1.14, "Hazardous Cargo Traffic Rept." Bechtel Western
 Power Corp "Probability & Risk Assessment for..." encl.

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In accordance with 10 CFR 170.12, enclosed is the required \$150.00 amendment application fee. A formal request for this change will be included in our next formal amendment application.

If you have any questions regarding this request, please call me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. D. Medford".

Enclosures

cc: H. Rood, NRR Senior Project Manager, San Onofre Units 2 and 3
J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

ENCLOSURE I

DESCRIPTION AND SAFETY ANALYSIS OF
PROPOSED CHANGE NPF-10/15-236

This is a request to revise Technical Specification 6.9.1.14, "Hazardous Cargo Traffic Report".

Existing Technical Specification

Unit 2: See Attachment A

Unit 3: See Attachment C

Proposed Technical Specification

Unit 2: See Attachment B

Unit 3: See Attachment D

Description

The proposed change revises Technical Specification reporting requirement 6.9.1.14, "Hazardous Cargo Traffic Report". The existing reporting requirements specify that the hazardous cargo traffic on Interstate 5 (I-5) and the AT&SF railway shall be monitored and the results submitted to the NRC Regional Administrator once every three years. The origin of these requirements is the San Onofre Units 2 and 3 Safety Evaluation Report (SER). In the SER, the NRC Staff concurred with SCE that the risks due to potential explosions or toxic gas releases (with the provisions for protecting against the specific toxic gases described) are acceptably low and meet the criteria described in the Standard Review Plan (SRP), Section 2.2.3. (the TGIS currently is designed to isolate the Control Room air intake upon detection of the presence of Ammonia, Chlorine, Butane and Propane). The SER conclusion was based in part on the knowledge of present sizes and frequencies of hazardous cargo shipments going past the San Onofre site. However, it was noted by the NRC Staff that significant changes over the lifetime of the plant in traffic density, transportation conditions, cargo composition, size and frequency could have a significant effect on the risk estimates. Therefore, the Staff required that the hazardous cargo traffic on I-5 and the AT&SF railway be monitored and the results periodically reported to the Staff.

The proposed change would remove the requirement to monitor and report the toxic gas cargo traffic on I-5. The requirement to monitor and report explosion hazard cargo on Interstate Route 5 and hazard cargo traffic on the AT&SF railway would remain in effect.

Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

Previously analyzed accidents include the release of toxic gases from an accident on Interstate Route 5 (I-5) which would potentially cause the San Onofre Units 2 and 3 control room envelope to become uninhabitable. In the SER, the NRC Staff concurred with SCE (based upon prior analyses) that the risks due to toxic gas releases, when coupled with the provisions for control room isolation, were acceptably low. However, the NRC Staff required that hazardous cargo traffic (explosive hazards and hazards from toxic gases) be monitored and the results periodically reported.

SCE has performed an analysis of the toxic gas hazard shipments along I-5. This analysis demonstrates that the combined risk associated with the composite toxic gas hazard from shipments on I-5 is acceptably low and meets the acceptance criteria of Standard Review Plan (SRP) Section 2.2.3. The analysis further demonstrates that this risk remains acceptably low throughout the remainder of the San Onofre Unit 3 operating license.

The proposed change does not alter the configuration of the plant or its operation. The proposed change, based upon the results of the analysis, deletes the requirement to monitor toxic gas hazardous cargo and report the results to the NRC. Therefore, since the risk from toxic gas shipments along I-5 has been demonstrated to be and to remain acceptably low, operation of the facility in accordance with this proposed change will not involve a significant increase in the probability or consequences of accidents previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not alter the configuration of the plant or its operation. Therefore, operation of the facility in accordance with this proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

Based upon SCE's analysis, the risk to control room habitability from toxic gas shipments along I-5 has been demonstrated to be and to remain acceptably low for the duration of the Unit 3 operating license. Elimination of the requirement to monitor and periodically report this traffic is not needed to assure the habitability of the San Onofre Units 2 and 3 control room. Therefore, operation of the facility in accordance with this proposed change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) relates to a change which either may result in some increase in the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan; for example, a change resulting from the application of a refinement of a previously used calculation model or design method.

In this case, the pertinent acceptance criteria are found in SRP Section 2.2.3, "Evaluation of Potential Accidents." The acceptance criteria are based on meeting the relevant requirements of 10 CFR Part 100 as it relates to the factors to be considered in the evaluation of sites. These requirements indicate that reactors should reflect through their design, construction and operation an extremely low probability for accidents that could result in the release of significant quantities of radioactive fission products. Specifically, the expected rate of occurrence of potential exposures in excess of the 10 CFR Part 100 guidelines of approximately 10^{-6} per year is acceptable if, when combined with reasonable qualitative arguments, the realistic probability can be shown to be lower.

An accident involving hazardous substances which could result in a toxic gas release and subsequent uninhabitability of the San Onofre Units 2 and 3 control room is considered to be an initiating event which could lead to potential consequences in excess of 10 CFR Part 100 exposure guidelines. With respect to the toxic gas release, a number of conservative assumptions were made relative to the toxic cloud's (resulting from an accident and a spill) ability to reach the control room intake. These assumptions are the same as those assumptions used in the analysis of individual gases considered previously and documented in the FSAR. Beyond uninhabitability of the control room, a number of other independent initiating events would be required to occur which would have to result in core damage, breach of the Reactor Coolant Pressure Boundary and failure of the containment structure in order to result in offsite exposure. SCE's analysis of the toxic gas hazard from shipments along I-5 demonstrates that the annual probability of the SONGS 1, 2 & 3 control room becoming uninhabitable due to accidental release of all toxic chemicals is less than a medium value of 10^{-6} per year. This result well exceeds the SRP acceptance criteria in that the expected rate of occurrence of potential offsite exposure which might result during this condition is considered to be several orders of magnitude below the 10^{-6} value. In addition, the SCE analysis demonstrates that this probability of control room uninhabitability remains acceptably low during the remainder of the Unit 3 operating license. As a result of this analysis, further highway

surveys to monitor toxic gas hazard traffic are unnecessary and may be discontinued.

The proposed change is similar to Example (vi) in that the proposed change may result in an insignificant increase in the probability of a previously analyzed accident, but where the results of the change are clearly within all acceptance criteria with respect to Standard Review Plan Section 2.2.3.

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; (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 on the environment as described in the NRC Final Environmental Statement.