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 FACIL:50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361  
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 MEDFORD,M.O. Southern California Edison Co.  
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 KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Comments on 840423 ltr re 831128 draft facility attachment  
 on IAEA safeguards implementation. Interpretations of  
 Code 5.1.1 proposed. Cost estimate encl.

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M.O. MEDFORD  
MANAGER, NUCLEAR LICENSING

July 12, 1984

TELEPHONE  
(213) 572-1749

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. George W. Knighton, Branch Chief  
Licensing Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-361  
San Onofre Nuclear Generating Station  
Unit 2

- References:
- A. November 28, 1983 letter from George W. Knighton (NRC) to Kenneth P. Baskin (SCE); Subject: IAEA Safeguards Implementation at SONGS-2
  - B. January 17, 1984 letter from M. O. Medford (SCE) to George W. Knighton (NRC); Subject: Draft Facility Attachment, San Onofre Unit 2
  - C. April 23, 1984 letter from George W. Knighton (NRC) to Kenneth P. Baskin (SCE); Subject: Draft Facility Attachment, San Onofre Unit 2

By Reference A the NRC requested that Southern California Edison (SCE) review and comment on a draft Facility Attachment which is to be the United States/International Atomic Energy Agency (US/IAEA) Agreement for the application of IAEA Safeguards at San Onofre Unit 2. By Reference B SCE provided comments to the NRC on the draft Facility Attachment sent to SCE by Reference A. By Reference C the NRC responded to SCE's comments in Reference B. SCE has reviewed the NRC comments on the draft Facility Attachment in Reference C and agrees with all of the NRC observations and interpretations with the exception of Code 5.1.1. SCE proposes the following interpretations for the recording of (1) Nuclear loss (uranium burn-up) and nuclear production and (2) Nuclear loss ( $P_{U-241}$  decay).

Facility Attachment Code 5.1.1 - Item No. 8 in Reference C:

- A. Recording "Nuclear loss (uranium-burnup) and nuclear production...for fuel assemblies, as of the date of discharge, and optionally every six months" means the following:

Nuclear loss and production will be calculated for each fuel assembly and recorded at the time of taking the core physical inventory during refueling outages and will be calculated and recorded at an interval not greater than six months for the total core but not for each assembly.

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- B. Recording "Nuclear loss (Pu-241 decay)...as of the date of shipment, and optionally every six months" means the following:

Pu-241 decay will be calculated for each fuel assembly and recorded at the time of taking the core physical inventory during refueling outages and will be calculated and recorded at an interval not greater than six months for the total core but not for each assembly.

In addition, in response to your Item 18. of Reference C, the titles of the people to be used in Codes 7.7 and 7.8 in the Facility Attachment to avoid the use of specific names are the following:

Code 7.7: Supervising Engineer, Nuclear Licensing  
San Onofre Units 2 and 3

Code 7.8: Manager, Operations and Maintenance Support

It is our understanding that the finalized Facility Attachment will be implemented at San Onofre Unit 2 through the issuance of a license amendment which has been initiated by the NRC. The notice of amendment to the San Onofre Unit 2 operating license, which will require compliance with the Facility Attachment by the addition of a Unit 2 License Condition, was published in the Federal Register on May 23, 1984 (Vol. 49, No. 101, p. 21840). We appreciate the opportunity to comment on the NRC interpretations and positions in the draft Facility Attachment and also request that we be permitted to comment on any additional changes or interpretations proposed by the NRC or by the IAEA. If the NRC and IAEA accept the above SCE interpretations of Code 5.1.1 of the Facility Attachment, SCE will accept the Facility Attachment (as proposed in Reference A with the modifications as agreed to by References B and C and this letter) as a license condition for implementation of IAEA Safeguards at San Onofre Unit 2.

In order to comply with the fuel surveillance requirements of the IAEA, SCE is planning to install an IAEA camera in the San Onofre Unit 2 Fuel Handling Building prior to the upcoming refueling outage. The Unit 2 refueling outage is currently scheduled to begin during September, 1984, however, the actual start date will be contingent on many operational considerations. In order to assure that SCE can complete the engineering and installation of the IAEA camera prior to the refueling outage, formal authorization and acceptance of responsibility for the \$5,000.00 cost must be received from the IAEA by July 15, 1984. Further, as requested by your Mr. H. Rood to assist in expediting the IAEA authorization, enclosed

Mr. G. W. Knighton

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(Enclosure 1) is a copy of the SCE definitive cost estimate, which includes the cost breakdown for the engineering and installation of an IAEA camera in the San Onofre Unit 2 Fuel Handling Building.

Please let me know if you have any questions.

Very truly yours,

*FR Kelly*  
*for MO Medford*

Enclosure

cc: Mr. H. Rood, NRC (to be opened by addressee only)  
Mr. A. Chaffee, NRC (Resident Inspector)  
Mr. J. B. Martin, NRC (Region V)



Work Order No. 1810 - 6001

**SCE**

(Estimating Type P.C.B.D.)

## WORKSHEET

	DATE	INITIALS
PREPARED BY	6/11	PBP
CHECKED BY		
APPROVALS		

Description Camera support in fuel handling building

Sheet 1 of 1

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