

design features. The probability of a fuel handling accident is unchanged. Because the spent fuel fission product activity has decayed by more than ten years compared to the source term analyzed in the DSAR, the consequences of the analyzed fuel handling accident are significantly lessened.

Therefore, the proposed DSAR change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different type of accident from any accident previously evaluated?

No. By implementing use of a qualified single-failure proof crane for cask handling, accidental dropping of the cask is not postulated. The cask load will be increased to a maximum of 105 tons under the new single failure proof turbine gantry crane design. The construction of a single failure proof turbine gantry crane mitigates the potential for an accident, since a single failure will not result in the loss of its capability to safely retain control of the hook load.

Therefore, performing fuel transfer in a manner consistent with the proposed DSAR amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety?

No. The proposed DSAR change makes use of analysis methods and inputs consistent with other structural and safety analyses given in the DSAR. The turbine gantry crane will be upgraded to comply with the single failure proof requirements of NUREG-0554. The safety margins provided by the new crane design have either remained the same or have been enhanced to ensure adequate margin to prevent failure of the crane or any lifting devices associated with the lifting of a spent fuel transfer cask.

Therefore, the proposed DSAR change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Units 2 and 3, San Diego County, California*

*Date of amendment requests:* August 4, 2003.

*Description of amendment requests:* The proposed amendments would revise Technical Specification 3.9.3, "Containment Penetrations."

Specifically, a Note will be added to the Limiting Condition for Operations that permits the Containment equipment hatch to be open during core alterations and movement of irradiated fuel in containment.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

*Response:* No.

Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to Technical Specification 3.9.3 would allow the containment equipment hatch to be open during fuel movement or core alterations. Currently, the equipment hatch is closed with four bolts during fuel movement or core alterations to prevent the escape of radioactive material in the event of an in-containment fuel handling accident. The containment equipment hatch is not an initiator of an accident. Whether the containment equipment hatch is open or closed during fuel movement and core alterations has no effect on the probability of any accident previously evaluated.

Allowing the containment equipment hatch to be open during fuel movement or core alterations does not significantly increase the consequences from a fuel handling accident. The calculated offsite doses are well within the limits of 10 CFR Part 100 and the calculated control room operator dose are within the limits of 10 CFR [Part] 50 Appendix A General Design Criterion (GDC) 19. In addition, the calculated doses are larger than the expected doses because the calculation does not incorporate containment closure after the containment is evacuated, which is much less than the two hours assumed in the analysis. The proposed change should significantly reduce the dose to workers in containment in the event of a fuel handling accident by reducing the time required to evacuate the containment.

The changes being proposed do not adversely affect assumptions contained in other plant safety analyses or the physical design of the plant, nor do they affect other Technical Specifications that preserve safety analysis assumptions. Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously analyzed.

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 to Technical Specification 3.9.3, "Containment Penetrations," affects a previously evaluated fuel handling accident inside containment. The new Fuel Handling Accident analysis continues to assume that all of the iodine and noble gases that become airborne escape the containment within two hours, and reach the exclusion area boundary and control room with no credit taken for containment air exhaust filtration, or for decay or deposition during atmospheric dispersion. The change will include the addition of flashing that will restrict a release of post-accident fission products when the Containment Structure Equipment Hatch Shield Doors are in their closed position. In this manner, the closed Shield Doors will provide Containment closure. Accordingly, since the proposed change does not functionally alter the design of plant systems and the revised analysis is consistent with the Fuel Handling Accident analysis, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. [The containment equipment hatch is not an initiator of an accident.]

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

*Response:* No.

The margin of safety as defined by 10 CFR Part 100 has not been significantly reduced. The calculated dose is well within the limits given in 10 CFR Part 100 as defined by Standard Review Plan 15.7.4. The analysis does not credit closing the Containment Structure Equipment Hatch Shield Doors. Accordingly, the proposed change does not alter the bases for assurance that safety-related activities are performed correctly or the basis for any Technical Specification that is related to the establishment of or maintenance of a safety margin. Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the above discussion, Southern California Edison has determined that the proposed amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety, therefore, the proposed change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

Therefore, the operation of the facility in accordance with this proposed change will not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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