

NEWS RELEASE

Citizens' Oversight

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FOR IMMEDIATE RELEASE

Citizens' Oversight Submits Petition to Intervene and Requests Hearing into San Onofre License Amendment Request

Changes remove inspection specifications from the license, reducing public and NRC review and obfuscating operator requirements

WASHINGTON D.C. (Oct. 19, 2012) -- Citizens' Oversight submitted a formal request[1] to the U.S. Nuclear Regulatory Commission (NRC) regarding a license amendment request[2] by Southern California Edison (SCE) for the San Onofre Nuclear Generating Station (San Onofre).

Raymond Lutz, Electrical Engineer and Founder of Citizens Oversight, prepared the petition to intervene based on a review of the proposed changes to the operating license of San Onofre. These changes to the license do not directly reflect on the recent emergency shutdown on January 31, 2012, and furthermore, is not in response to the proposal by SCE to operate San Onofre Unit 2 at a lower power level despite massive and severe damage to the steam generator tubes due to excessive vibration.

Instead, the proposed license amendment makes a large number of changes throughout the technical specifications of the operating license. Most of these changes are quite similar in nature: they remove explicit requirements for inspections from the operating license and move these to a separate document which is no longer under the control of the NRC, but is under the control of the licensee.

For example, in the original specifications document, SR 3.4.6.2 states that the operator must "Verify the secondary side water level in the required Steam Generators (SGs) is >50%," and this must be checked every "12 hours." The modified license deletes the explicit specification "12 hours" and substitutes "In accordance with the Surveillance Frequency Control Program." That program allows the licensee to decrease the frequency (i.e. increase the maximum period between inspections) without direct NRC or public review.

COPS believes these changes unnecessarily obfuscates the specification and puts inappropriate trust in the licensee to keep the inspections at a safe level. They rely on the Surveillance Frequency Control Program (SFCP) which utilizes Probability Risk Assessment (PRA) calculations using a set of preconceived failure modes. Such analyses are subject to well understood knowledge-based failure mechanisms of "overconfidence" and limited failure scenarios known to underestimate the variety of failure mechanisms.

An argument will be made that the specifications of surveillance frequencies have not changed, since the values of maximum time period between inspections will initially be the same, the fact is that the licensee

can vary these periods without any review by NRC or the public thereafter, and there are no "not-to-exceed" values specified in the specification. Furthermore, moving these values to another document obfuscates actions required by the licensee and may induce operator error as workers search for the correct value in multiple documents.

COPS also objects to the removal of the requirement to have a backup Atmospheric Dump Valve (ADV) from the license specification. Apparently, the plant has violated this requirement for years, and instead of dealing with it with appropriate mitigation measures, SCE proposes that the ADV requirement be deleted from the specification entirely, and suggests that eliminating this required redundancy does not impact safety, which is incorrect.

COPS also objects to many other changes proposed, including allowed leakage from the steam generators into the atmosphere, the fact that the isolation area around the plant is not enforceable, and numerous specification mistakes.

To the knowledge of COPS, no other organization is actively objecting to the license amendment request.

"The changes proposed further obfuscates the operating license and puts more trust in the operators of the plant instead of requiring regulatory agency and public review," said Raymond Lutz, author of the submission to the NRC. "After the egregious mistakes by Edison in the recent steam generator replacement project, we need to put a stop to further reliance on the good intentions of the operator and maintain our options to provide needed oversight to these dangerous plants."

The petition to intervene was filed prior to the deadline on October 17, 2012, and was submitted electronically using the Electronic Information Exchange. The request for hearing and petition to intervene was submitted in response to the publication of the NRC Staff's "Notice of Opportunity for Hearing," in the Federal Register at 77 Fed. Reg. 49,463, on August 16, 2012. The request is located in ADAMS and also in the EHD as accession number ML12291B227.

Citizens' Oversight is funded by membership dues and donations from the public and appreciates contributions from the public to help defer costs in executing this process. More information can be found at CitizensOversight.org.

[1] - "Review of SONGS License Amendment Request by COPS; Petition to Intervene and Request for a Hearing" -- <http://www.copswiki.org/Common/M1295>

[2] - NRC Proceeding San Onofre 50-361 and 50-362-LA, "Application and Amendment to Facility Operating License Involving Proposed No Significant Hazards Consideration Determination." -- <https://www.federalregister.gov/articles/2012/08/16/2012-20114/southern-california-edison-san-onofre-nuclear-generating-station-units-2-and-3-application-and>

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