September 12, 2000

Mr. Harold B. Ray
Executive Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
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SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 - ISSUANCE OF AMENDMENTS RELATED TO CONTAINMENT SPRAY SYSTEM ALLOWED OUTAGE TIME FROM 72 HOURS TO 7 DAYS (TAC NOS. MA8607 AND MA8608)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 171 to Facility Operating License No. NPF-10 and Amendment No. 162 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated March 30, 2000 (PCN-515).

The amendments revise TS 3.6.6.1, "Containment Spray and Cooling Systems," to change the allowed outage time (AOT) for a single inoperable train of the containment spray system from 72 hours to 7 days. Also, the combined AOT that appears in both Conditions A and C of TS 3.6.6.1 is revised from 10 days to 14 days.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,
/RA/

L. Raghavan, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures:
1. Amendment No. 171 to NPF-10
2. Amendment No. 162 to NPF-15
3. Safety Evaluation

cc w/encls: See next page

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✎See previous concurrence
*No major changes made to SE
**Discussed changes with MWohl on 8/16/00

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 171
License No. NPF-10

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated March 30, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 171 , are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Stephen Dembek, Chief, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 12, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 171

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
3.6-18	3.6-18

3.6 CONTAINMENT SYSTEMS

3.6.6.1 Containment Spray and Cooling Systems

LCO 3.6.6.1 Two containment spray trains and two containment cooling trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One containment spray train inoperable.	A.1 Restore containment spray train to OPERABLE status.	7 days AND 14 days from discovery of failure to meet the LCO
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 84 hours
C. One containment cooling train inoperable.	C.1 Restore containment cooling train to OPERABLE status.	7 days AND 14 days from discovery of failure to meet the LCO

(continued)

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 162
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated March 30, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 162 , are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Stephen Dembek, Chief, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 12, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 162

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
3.6-18	3.6-18

3.6 CONTAINMENT SYSTEMS

3.6.6.1 Containment Spray and Cooling Systems

LCO 3.6.6.1 Two containment spray trains and two containment cooling trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One containment spray train inoperable.	A.1 Restore containment spray train to OPERABLE status.	7 days AND 14 days from discovery of failure to meet the LCO
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 84 hours
C. One containment cooling train inoperable.	C.1 Restore containment cooling train to OPERABLE status.	7 days AND 14 days from discovery of failure to meet the LCO

(continued)

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 171 TO FACILITY OPERATING LICENSE NO. NPF-10

AND AMENDMENT NO. 162 TO FACILITY OPERATING LICENSE NO. NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated March 30, 2000 (PCN-515), Southern California Edison (SCE) Company (the licensee) requested technical specification (TS) changes for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The licensee proposed changes to TS 3.6.6.1, "Containment Spray and Cooling Systems," to revise the allowed outage time (AOT) for a single inoperable train of the containment spray system (CSS) from 72 hours to 7 days. Also, the licensee proposed to extend the combined AOT in the limiting condition for operation (LCO), Conditions A and C, from 10 days to 14 days. The licensee indicated that the proposed TS changes would provide the flexibility to perform on-line maintenance on the CSS and would avoid shutdown for maintenance requiring greater than 72 hours. The TS Bases section would be revised to incorporate these TS changes.

2.0 BACKGROUND

In March 1998 the Combustion Engineering Owners Group (CEOG) submitted a Joint Applications Report (JAR), CE NPSD-1045, "Modifications To The Containment Spray System, and Low Pressure Safety Injection System Technical Specifications," which provided justifications for the extensions of the completion time for the CSS. These justifications were based on a balance of probabilistic considerations, traditional engineering considerations, including defense-in-depth, and operating experience. Risk assessments for all of the Combustion Engineering (CE) plants are contained in this report. On December 21, 1999, the NRC staff generically approved the JAR and found it acceptable for referencing the JAR in license amendment applications. The NRC also indicated its intention to not repeat its review of the matters described in the JAR, except to assure that the material presented is applicable to the specific plant involved. The SONGS amendment request is based on comparisons of the SONGS probabilistic risk assessment (PRA) results and modified results with those from Arkansas Nuclear One, Unit 2 (ANO-2), which was the lead plant for this TS AOT change.

3.0 EVALUATION

3.1 Deterministic Evaluation

SONGS Units 2 and 3 each have two trains of containment spray. Each CSS reduces the containment pressure/temperature and the concentration of fission products in the containment atmosphere during a design-basis accident (DBA). Each train of CSS is capable of providing adequate spray to meet 50 percent of the system design requirements for the containment heat removal and 100 percent of the system design requirements for iodine removal. The CSS is redundant to the containment cooling system. The containment cooling system also has two trains, each of which is capable of providing 50 percent of the system design requirements for containment heat removal and for reducing the post-accident containment pressure/temperature.

During a DBA, a minimum of two containment cooling trains or two containment spray trains, or one of each, is required to maintain the containment peak pressure and temperature. Additionally, only one containment spray train is required to remove iodine from the containment atmosphere and maintain concentrations below those assumed in the safety analysis. SONGS also has diverse systems for containment heat removal capability. Because the other CSS train and containment cooling trains remain operable and available, the proposed change of a single inoperable CSS from the present 72 hours to 7 days would continue to meet the DBA requirements. Also, the proposed AOT extension will provide flexibility in the performance of both corrective and preventive maintenance of CSS components during power operation. This enhances the quality of maintenance work and the reliability of the CSS. Additionally, the proposed changes do not affect the plant design, configuration, or method of operation of the plant. Therefore, the staff finds the proposed changes to the CSS AOT acceptable.

3.2 Probabilistic Risk Assessment Evaluation

The staff used a three-tiered approach to evaluate the risk associated with the proposed TS changes as follows:

The first tier evaluated the PRA model and the impact of the completion time extensions for the CSS system on plant operational risk. The evaluation of the PRA model relied, in part, on a cross comparison approach with a similar plant.

The second tier addressed the need to preclude potentially high risk configurations by identifying the need for any additional constraints or compensatory actions that, if implemented, would avoid or reduce the probability of a risk-significant configuration during the time when one CSS train is out of service.

The third tier evaluated the licensee's configuration risk management program to ensure that the applicable plant configuration will be appropriately assessed from a risk perspective before entering into or during the proposed completion times.

Each tier and the associated findings are discussed below.

Tier 1 Evaluation and PRA Quality Review

The staff used a cross comparison approach to consider the viability of similar AOT relaxations for other participating CEOG plants, including SONGS. The staff's safety evaluation focused on

- the process adopted by the CEOG to assess single AOT risk,
- independent verification of the single AOT risk [essentially equivalent to incremental conditional core damage probability (ICCDP)[1]], and
- determination of the significance of single AOT risk relative to an acceptance guideline value.

The objective of this cross comparison evaluation is to use derived insights to examine the validity of the conclusions drawn in the joint submittals. The staff believes that the findings of a plant evaluation will be generally applicable to other CE plants, due to the fact that a common methodology was employed by the CEOG to quantify AOT risk and CE plants have similar design characteristics. The staff confirmed that differences in the underlying PRA models are mainly attributable to:

a. minor design differences,
b. operational differences,
c. success criteria assumptions,
d. common cause failure β-factor or multiple Greek letter (MGL) assumptions,
e. non-presence of fan coolers (Palo Verde only)
f. non-crediting of fan coolers (ANO-2 only)

The cross comparison draws on information contained in the CEOG Joint Application Reports, the licensees' responses to the staff's requests for additional information, the licensees' individual plant examinations (IPEs) performed in response to Generic Letter 88-20, "Individual Plant Examination for Severe Accident Vulnerabilities," and the corresponding IPE evaluations performed by the staff.

The following factors are chiefly responsible for the differences in CSS AOT risks among the CE plants:

g. non-presence of fan coolers (Palo Verde only)
h. non-crediting of fan coolers
i. CSS common cause β-factor or MGL assumptions

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[1]ICCDP= [(conditional CDF with the subject equipment out of service) - (baseline CDF with nominal expected equipment unavailabilities)] x (duration of single AOT under consideration).

The effect of removing a train of the CSS on the ability of the subject CE plants to mitigate the consequences of core damage, in part, is measured by ΔLERF (change in large early release frequency) or by ICLERP {ICLERP = (CLERF-LERF)X(duration of single AOT under consideration)}. The guidance measure for incremental conditional large early release probability (ICLERP) is 5.0E-8. Specifically, in U.S. NRC Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications" (Draft was issued as DG-1065), the staff provided its acceptance guidelines for the proposed TS change. It states:

> The licensee has demonstrated that the TS AOT change has only a small quantitative impact on plant risk. An ICCDP of less than 5.0E-7 is considered small for a single TS AOT change. An ICLERP of 5.0E-8 or less is also considered small. Also, the ICCDP contribution should be distributed in time such that any increase in the associated conditional risk is small and within the normal operating background (risk fluctuations) of the plant (Tier 1).

Based on the licensee's information in the CEOG March 1998 submittal, the CSS preventive and corrective maintenance weighted average single AOT risk for SONGS is 4.0E-8 and is less than the acceptance guideline value 5.OE-07 from RG 1.177. In addition, the change in the SONGS updated baseline core damage frequency (CDF) (as reported in the licensee's submittal of March 30, 2000) due to the CSS AOT change is about 0.0 percent, i.e., from 1.94E-05 per year to 1.94E-05 per year. The estimated null change in CDF is within the acceptance guidelines published in RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," July 1998, and is due to the fact that the CSS does not provide any core heat removal or RCS inventory makeup function. Therefore, CSS availability does not impact the CDF.

Additionally, in the CEOG's March 15, 1999, response to the staff request for additional information, it was determined that, for CE plants with diverse containment heat removal (i.e., containment sprays and fan coolers), the ICLERP is less than 3.0E-09. SONGS is such a plant, and thus its ICLERP is less than the acceptance guideline value 5.0E-08 from RG 1.177. Additionally, the SONGS ICLERP, as calculated by the licensee, is 8.3E-10, which is well below the value calculated for Palo Verde (2.2E-08) which has no fan coolers.

The staff results presented above represent a small change from the SONGS Units 2 and 3 results presented in CEOG report CE NPSD-1045. However, the results continue to support the conclusions reached in CEOG report CE NPSD-1045 and continue to meet the guidelines in RG 1.177 and RG 1.174 for risk-informed TS changes. The change in risk is due to a PRA model update implemented in 1998 in which the containment spray system was attributed additional credit as a backup for high pressure safety injection (HPSI) and high pressure recirculation following a small loss-of-coolant accident (LOCA) per the Emergency Operating Instructions.

The staff concludes that the cross comparisons to other CE plants in CE NPSD-1045 support the risk analysis and findings for SONGS.

To complete the first tier evaluation, the staff reviewed the quality of the SONGS PRA. However, this did not involve an in-depth review of the licensee's PRA to the extent necessary to validate the licensee's overall quantitative estimates. The staff's review consisted of an initial screening process that examined the attributes of the licensee's PRA, i.e., scope and level of detail that consider event sequences that are important to the the proposed TS change. The licensee's at-power PRA consists of a Level 1 and Level 2 analyses of accident sequences due to both internal and external events. The development of the PRA is based on the small event tree and large fault tree methodology using the fault tree linking technique, and the set of event trees are consistent with those in PRAs of other CE-designed plants. Also, in its submittal, the licensee stated that a comprehensive independent peer review of the SONGS Level 1 and Level 2 internal events living PRA for full power and shutdown operations was conducted between August 1996 and April 1997 by SCIENTECH, Inc. The review was based on the guidance provided in the PRA procedure guides such as NUREG/CR-2300, "PRA Procedures Guide. A Guide to the Performance of Probabilistic Risk Assessments for Nuclear Power Plants," and NUREG/CR-4550, "Analysis of Core Damage Frequency from Internal Events: Methodology Guidelines," as well as PRA applications documents such as EPRI TR-105396 and NUREG-1489, "A Review of NRC Staff Uses of Probabilistic Risk Assessment." In addition to the comprehensive independent review described above, SONGS has established a proceduralized process to provide an assurance of quality for required modifications to the SONGS Living PRA through the use of independent reviews and approvals. The licensee has also committed to monitor the impact of the proposed AOT change. Accordingly, the proposed risk-informed TS change will be implemented consistent with the SONGS TS requirements and using the Configuration Risk Management Program (CRMP) as documented in plant procedure S023-XV-50.

The staff finds that the small ICCDP and ICLERP estimated for the change in AOT from 72 hours to 7 days is consistent with the credit taken for the system in the PRA modeling, and that the extensive licensee review of the PRA models provides reasonable assurance that the models appropriately reflect the equipment and procedural characteristics at the plant.

This completes the staff's first tier evaluation of the licensee's proposal to extend the completion time for one CSS train from 3 to 7 days. Based on the above discussion, the staff finds acceptable the PRA model used by the SONGS licensee and also concludes that there is minimal impact of the completion time extensions for the CSS system on plant operational risk.

Tier 2 Evaluation

The licensee did not identify any dominant risk-significant configurations associated with the proposed CSS train completion time extension.

Tier 3 Evaluation

The licensee has established and implemented a CRMP program and requirements in Section 5.5.2.14 of the Administrative Controls Section of the TSs. The purpose of the CRMP is to ensure that a proceduralized PRA-informed process is in place that assesses the overall impact of plant maintenance on plant risk.

Implementation of the CRMP enables appropriate actions to be taken or decisions to be made to minimize and control risk when performing on-line maintenance for systems, structures, and components (SSCs) with a risk-informed completion time.

The scope of the SSCs included in the CRMP are those SSCs modeled in the licensee's plant PRA in addition to those SSCs considered of High Safety Significance per Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2 (the Maintenance Rule regulatory guide), that are not modeled in the PRA. Further, the licensee also has the ability to analyze the risk impact of outage configurations in a timely manner using a tool called the Safety Monitor.

Based on the above discussion, the staff's third tier evaluation concludes that the risk-informed CRMP proposed by the licensee will satisfactorily assess the risk associated with the removal of equipment from service during the proposed CSS AOT. The program provides the necessary assurances that appropriate assessments of plant risk configurations, including during outage conditions, are sufficient to support the completion time extension request for the CSS system.

Summary

The staff has evaluated the licensee's proposed changes for compliance with regulatory requirements as documented in this evaluation and has determined that they are acceptable. This determination is based on the following:

1. The staff finds acceptable the PRA model used by the SONGS licensee and also concludes that there is minimal impact of the completion time extensions for the CSS system on plant operational risk (Tier 1 evaluation).

2. The review of potentially high risk configurations did not identify the need for any additional constraints or compensatory actions that, if implemented, would avoid or reduce the probability of a risk-significant configuration (Tier 2 evaluation).

3. The risk-informed CRMP proposed by the licensee will satisfactorily assess the risk associated with the removal of equipment from service during the proposed CSS AOT (Tier 3 evaluation) and will be managed by plant procedures.

The staff, therefore, finds that the completion time for one CSS train may be extended to 7 days, with a negligible impact on risk.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no

significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 25769). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: K. Desai
M. Wohl

Date: September 12, 2000