

January 30, 2001

Mr. Harold B. Ray  
Executive Vice President  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 -  
ISSUANCE OF AMENDMENTS ON CONTROL ROOM EMERGENCY AIR  
CLEANUP SYSTEM (TAC NOS. MB0294 AND MB0295)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 177 to Facility Operating License No. NPF-10 and Amendment No. 168 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 October 6, 2000 (PCN-518).

The amendments revise TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACUS)," to establish actions to be taken for inoperable ventilation systems due to a degraded control room pressure boundary. The amendments allow up to 24 hours to restore the pressure boundary to operable status when two ventilation trains are inoperable due to an inoperable pressure boundary in MODES 1, 2, 3, and 4. In addition, a limiting condition for operation note is added to allow the pressure boundary to be opened intermittently under administrative control without affecting CREACUS operability.

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/*

Girija S. Shukla, 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. 177 to NPF-10  
2. Amendment No. 168 to NPF-15  
3. Safety Evaluation

cc w/encl.: See next page

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Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

DISTRIBUTION  
PUBLIC

Enclosures: 1. Amendment No. 177 to NPF-10 PDIV-2 r/f  
2. Amendment No. 168 to NPF-15 G. Hill (4)  
3. Safety Evaluation  
RidsNrrDlpmLpdiv (S.Richards)  
RidsNrrPMGShukla  
cc w/encl.: See next page  
RidsNrrLACJamerson  
RidsNrrDripRtsb (W.Beckner)  
RidsAcrsAcnwMailCenter  
RidsOgcRp  
RidsRgn4MailCenter (C. Marschall, L.  
Hurley, D. Bujol)  
R. Giardina

ACCESSION NO: ML010320085 Package: ML010320094 TS Pages: ML010330116 &  
ML010330159

OFFICE	PDIV-2/PM	PDIV-D/LA	RTSB/BC	OGC	PDIV-2/SC
NAME	GShukla:lcc	CJamerson	WBeckner	LClark	SDembek
DATE	12/18/00	12/15/00	12/28/2000	1/17/01	1/24/01

OFFICIAL RECORD COPY

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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. 177

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 October 6, 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.177, 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

*/RA/*

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: January 30, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 177

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

3.7-24 through 3.7-26

INSERT

3.7-24 through 3.7-26

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. 168

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 October 6, 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.168, 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

*/RA/*

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: January 30, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 168

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

3.7-24 through 3.7-26

INSERT

3.7-24 through 3.7-26

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 177 TO FACILITY OPERATING LICENSE NO. NPF-10  
AND AMENDMENT NO. 168 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 application dated October 6, 2000 (PCN-518), Southern California Edison Company, et al. (the licensee), requested changes to the Technical Specifications (TSs) for San Onofre Nuclear Generating Station, Units 2 and 3. The proposed changes would revise TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACUS)," to establish actions to be taken for inoperable ventilation systems due to a degraded control room pressure boundary. The proposed changes would allow up to 24 hours to restore the pressure boundary to operable status when two ventilation trains are inoperable due to an inoperable pressure boundary in Modes 1, 2, 3, and 4. In addition, a limiting condition for operation (LCO) note would be added to allow the pressure boundary to be opened intermittently under administrative control without affecting CREACUS operability. The applicable TS Bases have been revised by the licensee to document the TS changes and to provide supporting information. These changes are based on the Technical Specification Task Force (TSTF) No. 287 to the Standard Technical Specifications (STS).

## 2.0 BACKGROUND

The existing LCO 3.7.11 surveillance requirements that test the integrity of the control room boundary require a positive pressure limit to be satisfied with one ventilation train operating. While other surveillance requirements in the same specification test the operability and function of the ventilation train, the pressure test ensures that the control room pressure boundary leak tightness is adequate to meet design assumptions for post-accident operator doses.

Currently, there are no corresponding Condition, Required Actions, or Completion Times specified in LCO 3.7.11 should the pressure boundary surveillance not be met. Under the existing specifications, LCO 3.0.3 must be entered (for two-train inoperability). Requiring the

plant to enter LCO 3.0.3 when the ventilation boundary is not intact does not provide time to effect required repairs or corrective maintenance activities.

The proposed change is similar in nature to STS LCOs for secondary containment in a boiling-water reactor and shield building in a pressurized-water reactor which allows 24 hours to restore secondary containment or shield building envelope to operable status before requiring an orderly shutdown from operating conditions.

### 3.0 EVALUATION

The proposed changes to TS 3.7.11 are:

1. A Note has been added to LCO 3.7.11 for the CREACUS to allow the control room boundary to be opened intermittently under administrative control. Corresponding Bases have been added which establish the administrative controls that are required to minimize the consequences of the open boundary.
2. A new Condition B is added to LCO 3.7.11 to specify that 24 hours are allowed to restore an inoperable control room boundary to operable status. All other conditions have been administratively re-labeled to support this change. Corresponding Bases are added to support this change.
3. Condition F of LCO 3.7.11 for two inoperable CREACUS trains in Modes 1-4 is modified to exclude entry into this Condition when the trains are inoperable because of the degraded control room pressure boundary. The associated Bases for Condition F are revised accordingly.

The LCO is modified by a Note allowing the control room boundary to be opened intermittently under administrative controls. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room area isolation is indicated.

If the control room boundary is inoperable in Modes 1, 2, 3, and 4 such that the CREACUS trains cannot establish or maintain the required pressure, action must be taken to restore control room pressure boundary to an operable status within 24 hours.

The proposed changes would allow 24 hours (during Modes 1, 2, 3, and 4) to restore the capability to maintain control room boundary pressure before requiring the unit to perform an orderly shutdown and also allows intermittent opening of the control room boundary under administrative control. During the period that the control room boundary is inoperable, appropriate compensatory measures consistent with the intent of General Design Criterion (GDC) 19 of Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR Part 50) will be utilized to protect the control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature, and relative humidity and to ensure physical security. These preplanned measures will be available to address these concerns for intentional and unintentional entry into the condition. For example, when the control room boundary is opened for other than entry through doors, the proposed Bases state

that in addition to other necessary measures that a dedicated individual be stationed in the area keeping continuous contact with the control room to rapidly restore the boundary.

Additionally, the proposed change is considered acceptable because of the low probability of an event requiring an intact control room boundary occurring during the 24-hour action Completion Time associated with Condition "B".

Based on the low probability of an event occurring in this time and the availability of compensatory measures consistent with GDC 19 to minimize the consequences during an event, the proposed change is considered acceptable and is in conformance with TSTF-287.

#### 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 69066). 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 Contributor: R. Giardina

Date: January 30, 2001