

March 27, 2002

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 RE: DELETION OF COMPLETED LICENSE  
CONDITIONS (TAC NOS. MB1552 AND MB1553)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 185 to Facility Operating License No. NPF-10 and Amendment No. 176 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 Facility Operating Licenses in response to your application dated March 21, 2001, as supplemented by letter dated January 11, 2002. The amendments revise the operating license of each unit to delete those license conditions that have been completed and are no longer required and to make other corrections and editorial changes.

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/*

A. Wang, Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures: 1. Amendment No. 185 to NPF-10  
2. Amendment No. 176 to NPF-15  
3. Safety Evaluation

cc w/encls: See next page

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A. Wang, Project Manager, Section 2  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

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| NAME   | AWang:sp  | MMcAllister | LRaghavan |         | SDembek   | WBeckner  |
| DATE   | 2/25/02   | 2/22/02     | 2/25/02   | 3/19/02 | 3/22/02   | 2/28/02   |

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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. 185  
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 21, 2001, as supplemented by letter dated January 11, 2002, 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 paragraph 2.C(2) of Facility Operating License No. NPF-10 as indicated in the attachment to this license amendment.
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  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to paragraph 2.C(2) of the  
Facility Operating License No. NPF-10

Date of Issuance: March 27, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 185

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Facility Operating License No. NPF-10 with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

pages 1-14

INSERT

pages 1-9

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\*Overleaf pages provided to maintain document completeness. No changes on these pages.

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. 176

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 21, 2001, as supplemented by letter dated January 11, 2002, 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 paragraph 2.C(2) of Facility Operating License No. NPF-15 as indicated in the attachment to this license amendment.
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  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to paragraph 2.C(2) of the  
Facility Operating License No. NPF-15

Date of Issuance: March 27, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 176

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Facility Operating License No. NPF-15 with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

pages 1-13  
Attachment 1

INSERT

pages 1-8

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\*Overleaf pages provided to maintain document completeness. No changes on these pages.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 185 TO FACILITY OPERATING LICENSE NO. NPF-10  
AND AMENDMENT NO. 176 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 March 21, 2001, as supplemented by letter dated January 11, 2002, Southern California Edison Company, et al. (SCE or the licensee) requested changes to the Facility Operating License No. NPF-10, and Facility Operating License No. NPF-15 (FOLs) for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. The licensee proposed to simplify the FOLs by deleting those license conditions that have been completed and are no longer required to be identified in the licenses. In addition, the license would be reformatted to reflect the deletion of the completed license conditions. The supplemental letter dated January 11, 2002, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on April 18, 2001 (66 FR 20009).

## 2.0 EVALUATION

During the Commission's review of a licensee's initial application for operating license or subsequent applications for license amendment, the NRC staff would base its findings and determination on a variety of information provided by the licensee. In support of its application, licensees may commit to implement certain future design, operational and other activities. When the NRC staff believes that any of the licensee's commitments are vital to its safety determination, and it is desirable to ensure that the licensee's commitments are implemented, then the NRC staff would impose conditions to its issuance of license or approval of the license amendments. These are known as "License Conditions" and are specified in the Operating License. Some of these license conditions may specify that the licensee need only inform the Commission that a certain feature has been completed and in other cases, the licensee may be required to submit information for the NRC staff's review and approval.

During the initial licensing of SONGS, Units 2 and 3, a number of outstanding items were required to be completed and were imposed as conditions for low power and full power operation of SONGS, Units 2 and Unit 3. Since many of the required conditions have been completed or are captured elsewhere [e.g., Technical Specifications (TS)], these license conditions are no longer required and the licensee has proposed to delete them.

By its application dated March 21, 2001, the licensee proposed to delete those license conditions that have been completed. The licensee proposed other editorial changes, mainly license condition number changes to reflect the deletion of the license conditions. After reviewing this submittal the NRC staff concluded that the license should not be renumbered so as to provide easy reference to these past license conditions. The licensee in a supplemental letter dated January 11, 2002, revised the license to maintain the titles and numbering sequence while making a statement that the license condition had been deleted by this amendment. In addition, to support its application, the licensee identified reference documents that document satisfactory implementation of the license conditions. The licensee's March 31, 2001, submittal as supplemented by letter dated January 11, 2002, are reviewed below. The item numbers before each paragraph denote the paragraph number in the FOL. The FOL for SONGS, Units 2 and 3 are discussed separately.

## 2.1 SONGS Unit 2

### 2.C.(4) Intentionally Deleted

This title will now remain. As the condition was previously deleted, it will remain to maintain the current license condition numbering sequence to provide an easy reference to past license conditions.

### 2.C.(5) Environmental Qualification (Section 3.11, SER, SSER #3, SSER #4)

This title will now remain. As the condition was previously deleted, it will remain to maintain the current license condition numbering sequence to provide an easy reference to past license conditions.

### 2.C(6) High Burnup Fission Gas Release (Section 4.2.2.2, SER)

As required by this license condition, revised analyses for SONGS, Units 2 and 3 High Burnup Fission Gas Release and associated methodology were submitted to the NRC by SCE letter dated June 7, 1984 (Reference 1). The NRC approved this report on August 3, 1990 (Reference 4), with a caveat that the conclusions in the analyses must remain valid in subsequent reload analyses and the information supporting these conclusions remain in an auditable form and inspectable. The "auditable" requirements required by the NRC in letter dated August 3, 1990, are met by the fuel performance reload analyses generated by SCE using topical report SCE-9801-A-P, "Reload Analysis Methodology for the San Onofre Nuclear Generating Station Units 2 and 3" submitted to the NRC by SCE by letter dated November 30, 1998 (Reference 5). This topical report was approved by the NRC Safety Evaluation (SE) letter to SCE dated June 2, 1999 (Reference 6). The NRC's August 3, 1990, requirement for SCE to seek NRC staff approval for any changes is met as described in topical report SCE-9801-A-P, Section 4.5.3, third paragraph, which specifies that "Methodology changes that are not compliant with the NRC approved methodology...will not be implemented without prior NRC approval." The NRC staff agrees that since any future changes must be reviewed and approved by the NRC staff, the "auditable" requirements of the NRC staff's August 3, 1990,

approval are met. The NRC staff has determined that the license condition has been fulfilled and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(7) Low Temperature Overpressurization Protection (Section 5.2.2.2, SER)

The licensee proposed to delete this license condition pertaining to the reexamination of the TS requirements for steam generator/reactor coolant system (RCS) delta Temperature (T) and Shut Down Cooling System (SDCS) initiation temperature limits. SCE by letter dated May 8, 1989 (Reference 8), provided a report in accordance with this license condition, prior to five effective power years of plant operation, verifying that the original steam generator/RCS delta T and the SDCS initiation temperature limits were still suitably conservative. The NRC staff by letter dated June 23, 1989 (Reference 7), confirmed the results of this report. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(8) Control Room Pressurization Capability (Section 6.4, SER, SSER #5)

This license condition for requiring modifications for a positive pressure of greater than or equal to 1/8 inch water gauge (WG) were installed by Design Change Package (DCP) 2/3-952.1M (Reference 9). Testing for this item is controlled by the TS Surveillance Requirement (SR) 3.7.11.4, implemented by Maintenance Procedure SO23-I-2.44, to ensure that the control room emergency air clean up system maintains a positive pressure of greater than or equal to 1/8 inch WG. The NRC staff has determined that the license condition has been fulfilled as the positive pressure requirement required by this license condition is assured by the TS SR 3.7.11.4 and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(9) Seismic Trip System (Section 7.2.5, SSER #4)

The licensee proposed to delete this license condition pertaining to an operable seismic trip system. The seismic trip system was determined to be operable and this license condition was closed by NRC Inspection Report 50-361/82-17 (Reference 10) dated June 17, 1982 [Item 6.a.(1)]. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(10) Volume Control Tank Outlet Valve Control Logic - Safety Actuation (Section 7.3.5, SSER #4)

The licensee proposed to delete this license condition pertaining to the volume control tank outlet valve control logic. NRC inspection report 83-03 and 83-04 dated March 14, 1983 (Reference 111), paragraph 4, verified completion of this design modification. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(11) Instrumentation Compliance with Post Accident Monitoring Instrument Regulatory Guide (RG) 1.97 (Section 7.5.1, SER, SSER #5)

The licensee proposed to delete this license condition pertaining to a proposed implementation schedule, for meeting Revision 2 of RG 1.97. NRC letter to SCE dated May 26, 1987 (Reference 14), transmitted the SE for SONGS, Units 2 and 3 for conformance to RG 1.97, Revision 2. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(12)a Control System Failures (Section 7.7, SSER #4)

The licensee proposed to delete this license condition pertaining to control system failures caused by high energy line break, and by failures of any power sources, sensor, or sensor impulse lines which provide power or signals to two or more control systems. NRC letter to SCE dated August 17, 1988 (Reference 18), concluded that no further evaluation was required and that this license condition had been satisfied. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(13) Diesel Generator Modifications (Section 8.3.1, SER)

The licensee proposed to delete this license condition pertaining to the installation of a heavy duty turbocharger gear drive assembly on the emergency diesel generators. NRC Inspection Report 83-39, and 83-40 dated January 19, 1984 (Reference 112), paragraph 5, verified completion of this design modification. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(14) Fire Protection (Section 9.5.1, SER, SSER #4, SSER #5, Section 1.12, SSER #5)

This change is no longer needed as the numerical sequence for the license conditions will be maintained.

2.C.(15) Turbine Disk Inspection (Section 10.2.2, SER)

The licensee proposed to delete this license condition pertaining to inspections of the bores of the low pressure turbine disc for ultrasonic indications. General Electric Company of England inspected the bores of the low pressure turbine disc for ultrasonic indications prior to startup following the second refueling outage to satisfy this license condition. SCE letter to the NRC dated June 20, 1986 (Reference 20), informed the NRC that these inspections were performed and provided the inspection report. The NRC staff has confirmed that the June 20, 1986, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(16) Radioactive Waste System (Section 11.1, SER, SSER #5)

The licensee proposed to delete this license condition pertaining to shipment of "Wet" solid radwaste from the facility. In SCE letter to NRC dated May 1, 1985, "San Onofre Nuclear Generating Station Units 1, 2, and 3" (Reference 118, I), SCE informed the NRC that the SCE San Onofre contract with Chem-Nuclear, Inc., for the NRC interim approved Process Control Program (PCP) had expired on April 1, 1985, and that Chem-Nuclear had been replaced by Nuclear Packaging (NuPac), Inc. as the vendor of wet radwaste treatment services at SONGS. This letter also advised that the NuPac topical report, TP-02-NP, which addressed their dewatering system, had been submitted for NRC review in August 1984. This (May 1, 1985) letter requested NRC approval of topical report, TP-02-NP for SCE use of the NuPac dewatering system, as described in the NuPac topical report. In NRC's letter to SCE dated June 11, 1985, "Interim Approval of Dewatering of Spent Resin" (Reference 118, J), the NRC staff responded to the May 1, 1985, SCE letter above, granting interim approval effective until the NRC review of NuPac's licensing topical report would be completed. In NRC's letter to SCE dated August 10, 1995, "Final Draft of the NRC Safety Evaluation Report (SER) on San Onofre Improved Standard Technical Specifications (STS)" (Reference 118, K), SCE provided a final draft of the NRC SER on SCE license amendment request PCN-299 dated August 25, 1994, for conversion of the SONGS, Unit 2 and 3 TSs to the improved STS. This SER's discussion of

the PCP for waste solidification, on page 69, refers to the San Onofre Licensee Controlled Specifications (LCS) and Topical Quality Assurance Program (TQAM) PCP descriptions. The SER concludes that the regulatory controls for the San Onofre TQAM provided sufficient control of the requirements and that removing PCP provisions from the TSs was acceptable. In NRC letter to SCE dated February 9, 2000, "NRC Inspection Report No. 50-361/2000-01: 50-362/2000-01" (Reference 118, L), inspection report item R1.c concluded that SCE met regulatory requirements associated with the solid radioactive waste management program. In SONGS, Units 2 and 3 LCS PCP (Reference 118, M), LCS Section 5.0.103.2.2 provides the current PCP control to ensure that processing and packaging of solid radioactive wastes at SONGS, Units 2 and 3 is accomplished in a manner to ensure that all regulatory compliance requirements are met. The NRC staff has confirmed that Inspection Report No. 50-361/2000-01: 50-362/2000-01" (Reference 118, L), inspection report item R1.c and LCS Section 5.0.103.2.2 satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17) Purge System Monitors (Section 11.3, SER, SSER #5)

The licensee proposed to delete this license condition pertaining to having equipment be operable for the capability to continuously monitor and sample the containment purge exhaust directly from the purge stack. By SCE's letter to the NRC dated March 2, 1984 (Reference 23), the licensee informed the NRC staff that the required effluent monitors were installed. Design Change Package (DCP) 2/3-53N (Reference 24) "Addition of Containment Purge System Monitors" verified these changes were made in SONGS, Units 2 and 3 in 1986 and 1988 respectively. The NRC staff has confirmed that the March 2, 1984, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(18) Initial Test Program (Section 14, SER)

The licensee proposed to delete this license condition pertaining to the post-fuel loading initial test program as set forth in Section 14 of the SONGS, Units 2 and 3 Final Safety Analysis Report, as amended. SCE's letter to the NRC dated October 21, 1983 (Reference 30), subsequently provided the final supplementary report to the Startup Report which addressed testing from issuance of the operating license through completion of startup testing. The NRC staff has confirmed that the October 21, 1983, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)a. Shift Technical Advisor (I.A.1.1, SSER #1)

The licensee proposed to delete this license condition pertaining to the requirement for an on-shift technical advisor to the shift supervisor (watch engineer). NRC Inspection Report No. 50-361/82-10 dated March 15, 1982 (Reference 31), reported satisfactory completion of this item (Item 3.a.). The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)b. Shift Manning (I.A.1.1, SSER #1) - Deleted

This title will now remain. As the condition was previously deleted, it will remain to maintain the current license condition numbering sequence to provide an easy reference to past license conditions.

2.C.(19)c. Independent Safety Engineering Group (1.B.1.2, SSER #1)

The licensee proposed to delete this license condition requiring an on-site independent safety engineering group. This function was added to TS until the conversion to the improved STS at which time it was deleted. The principal on-site independent safety engineering group function is to examine plant operating characteristics. The Nuclear Oversight and Regulatory Affairs Department Nuclear Safety Group has established an operating experience program as described in the San Onofre Quality Assurance (QA) Topical Report Section 17.2.20.4 to evaluate Institute of Nuclear Power Operations reports, NRC publications, vendor 10 CFR Part 21 letters, and other appropriate sources of operating experience information. The other on-site independent safety engineering group function is to maintain surveillance of plant activities. The QA organization performs surveillances and audits of a wide range of plant activities. This wide range of plant activities is described in Section 17.2.18 of the San Onofre QA Topical Report. The on-site independent safety engineering group is maintained by the plant QA Topical Report and therefore, the license condition has been satisfied and the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)d. Procedures for Transients and Accidents (I.C.1, SSER #1, SSER #2, SSER #5)

The licensee proposed to delete this license condition pertaining to emergency procedure guidelines. Emergency procedures have been implemented to satisfy the requirements of this license condition as verified in NRC letters to SCE dated August 3, 1988 (Reference 32), and May 31, 1990 (Reference 33). The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)e. Procedures for Verifying Correct Performance of Operating Activities (I.C.6, SSER #1)

The licensee proposed to delete this license condition pertaining to a system for verifying the correct performance of operating activities. The independent verification requirements have been incorporated in SONGS procedures and programs. The NRC closed this license condition in NRC Inspection Report No. 50-361/82-10 (Reference No. 31) item 3b, dated March 15, 1982. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)f. 1-17 Control Room Design Review (I.D.1, SSER #1)

The licensee proposed to delete this license condition pertaining to Detailed Control Room Design Review (DCRDR). In NRC letter to SCE dated October 5, 1982, "NRC Inspection Reports 50-361/82-27 and 50-362/82-19" (PCN-517 Reference No. 36), Item 2.a, "(Closed) Item I.D.1, Control Room Design Review [Low Power License Condition 2.C.(19)]," the inspector verified that all requirements of the low power operating license relative to this item had been completed in the Unit 2 control room and confirmed that no items of noncompliance or deviations were identified. The NRC SE on the DCRDR was provided to SCE by letter dated December 15, 1986 (Reference 37). The SE concluded that the DCRDR activities of SCE met all requirements. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)g. Special Low Power Testing and Training (I.G.1, SSER #1)

The licensee proposed to delete this license condition pertaining to detailed test procedures and a safety analysis. SCE's letter to the NRC dated April 15, 1982 (Reference 38), provided the safety analysis and detailed test procedures to satisfy this license condition. The NRC staff has confirmed that the April 15, 1982, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)h. Reactor Coolant System Vents (II.B.1), (SSER #1, SSER #4)

The licensee proposed to delete this license condition pertaining to requirements for procedures or procedure guidelines for reactor coolant gas vent system operation and testing. SCE's letter to the NRC dated April 27, 1982 (Reference 39), provided procedural guidelines and the reactor coolant gas vent system operating instruction to satisfy this license condition. NRC Inspection Report 50-361/82-27 dated October 5, 1982 (Reference 36), (Item 3.e.) verified compliance. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)i. Post-Accident Sampling System (NUREG-0737 Item II.B.3)

The licensee proposed to delete this license condition pertaining to the post-accident sampling program. By letter dated March 26, 2001, the NRC had approved the removal of this license condition by License Amendment No.178. As the NRC staff has previously reviewed and documented its determination that this license condition can be removed, the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)j. Safety Valve Test Requirements (II.D.1, SSER #1)

The licensee proposed to delete this license condition pertaining to the adequacy of the SONGS 2 RCS safety valves. SCE's letter to the NRC dated June 29, 1982 (Reference 43), provided reports containing the required information to satisfy this license condition. The NRC staff has confirmed that the June 29, 1982, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)k. Direct Indication of Safety Valve Position (II.D.3, SSER #1)

The licensee proposed to delete this license condition pertaining to the safety valve position indication system. SCE's letter to the NRC dated April 22, 1982 (Reference 44), confirmed that the safety valve position indication system had been appropriately seismically and environmentally qualified to meet the requirements of this license condition. The NRC staff has confirmed that the April 22, 1982, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)l. Auxiliary Feedwater (AFW) Pump 48-Hour Endurance Test (II.E.1.1, SSER #1)

The licensee proposed to delete this license condition pertaining to a 48-hour endurance test of all AFW pumps. Prior to exceeding 5 percent power SCE conducted a 48-hour endurance test on the SONGS Unit 2 AFW pumps. NRC Inspection Report 50-361/82-27 (Reference 36) (Item 2.c.) verified compliance. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)m. Emergency Power Supply for Pressurizer Heaters (II.E.3.1, SSER #1, SSER #5)

The licensee proposed to delete this license condition pertaining to implementation of procedures to preclude the automatic reapplication of pressurizer heaters to Class 1E buses upon Safety Injection Actuation Signal (SIAS) reset. NRC Inspection Report No. 82-23 and 82-13 dated July 14, 1982 (Reference 113), item 2, documented NRC inspection of applicable procedures and concluded that the procedures had adequate provisions to preclude the unintentional automatic re-loading of pressurizer heaters onto Class 1E buses on SIAS reset. DCP 2/3-247J (Reference 107), was implemented to modify the pressurizer heater control circuits to prevent automatic power restoration to these devices. The NRC staff has confirmed that DCP 2/3 247J satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)n. Additional Monitoring Instrumentation (II.F.1, SSER #1, SSER #4)

The licensee proposed to delete this license condition requiring the mid/high range noble gas monitors and iodine and particulate isokinetic samplers to be operable prior to exceeding 5 percent power. There are three sets of monitors associated with this license condition: 7865, plant vent and containment purge monitors; 7870, condenser evacuation system monitors; and 7828, containment purge only monitors.

In SCE's letter to NRC dated February 3, 1982, "Implementation Program for Radiation Monitors," SONGS, Units 2 and 3 (Reference 118 E), Enclosure 4 of this letter discusses a SCE proposal to utilize the containment atmosphere monitoring system, gaseous radiation monitors 7804 and 7807, rather than provide direct monitoring on the purge lines. In NUREG-0712 Supplement No. 5, "Safety Evaluation Report related to the Operation of San Onofre Nuclear Generating Station Units 2 and 3" dated February 1982 (Reference 118 F), Section 11.3 approved interim use of the containment atmosphere monitoring system and associated sampling media in lieu of the SCE planned response to NUREG-0737 of monitoring directly on the purge lines. The requirement for capability to perform continuous monitoring and sampling of the containment purge exhaust directly from the purge stack after the first refueling outage was subsequently documented and fulfilled by installation of containment purge monitors 7828 per Unit 2/3 license conditions 2.C.(17) / 2.C.(15) "Purge System Monitors (Section 11.3, SER, SSER # 5)."

SCE Audit Report SCES-041-83 (Reference 45), Item 9 verified that the noble gas monitors (7865, 7870, and 7828) were calibrated, functionally tested, and operable prior to exceeding five (5) percent power at Unit 2. NRC Inspection Report Nos. 84-29 and 84-30 dated December 17, 1984 (Reference 114), item 4, documented NRC verification that this item was acceptable.

The license condition also required mid/high range iodine and particulate isokinetic samplers be operable prior to exceeding 5 percent power. In NRC's letter to SCE dated March 2, 1982, "NRC Inspection Report 50-361/82-09" (Reference 118, A), Enclosure 2 of SCE's letter to NRC dated February 1, 1982 (this letter is Enclosure 1 of NRC Inspection Report No. 361/82-09) Section II "CONDENSER EVACUATION SYSTEM" describes the condenser evacuation system monitor 7870 which provides the capability for iodine and fixed particulate sampling. In NRC's letter to SCE dated March 4, 1983, "NRC Inspection Report 50-361/83-08" (Reference 118, B), Section B "Sampling and Analysis of Plant Effluents," the inspector discusses the procedure for particulate and radio iodine sampling using the wide range gas monitors 7865 and 7870 in a post-accident situation. This inspection determined that there were inadequate preparations for

the onsite analysis of charcoal or particulate samples, that criteria for offsite shipments was inconsistent, and that procedures were inadequate regarding direction for higher activity particulate and radioiodine samples being sent offsite for analysis. In NRC's letter to SCE dated November 16, 1983, "NRC Inspection Report No. 50-361/83-37" (Reference 118, C), the inspection report addressed sampling and analysis issues raised in Reference B. In section d of this report "Additional Review II.F.1, Attachment 2" the inspector indicated that the system did not appear to meet the intent of NUREG-0737, Item II.F.1-2, in that a significant time delay was necessary before one person could be expected to retrieve a sample with acceptable exposure limits. This issue was identified as open item 50-361/83-37-01. NRC's letter to SCE dated March 7, 1986, "NRC Inspection Report No. 50-361/86-02" (Reference 118, D), Section 2, "Licensee Action on Previous Inspection Findings (Closed) Followup (50-361/83-37-01)," the inspector verified that procedure SO123-III-8.10.23 was revised to address manpower requirements for post-accident sample collection, and closed this item. The current practice for handling high-range iodine and particulate wide-range gas monitor samples continues to utilize procedure SO123-III-8.10.23. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)o. ICC (Inadequate Core Cooling) Instrumentation (II.F.2, SSER #1, SSER #2, SSER #4)

The licensee proposed to delete this license condition pertaining to the subcooling monitors, the incore detector assemblies, the safety parameter display system (SPDS), the cables for the core exit thermocouples, and the heated junction thermocouple probe and associated process instrumentation. The actions for equipment required by this license condition were determined to be completed by NRC inspection. Item 14.a. of NRC Inspection Reports Nos. 50-361/82-39 and 50-362/82-31 dated December 7, 1982 (Reference 34), verified that the required actions had been completed for all items except the SPDS. The safety parameter display requirement (Item 4) was satisfied in response to NRC Generic Letter (GL) 89-06 regarding certification of implementation of a Safety Parameter Display System (SPDS). SCE's letter to the NRC dated January 31, 1991 (Reference 105), informed the NRC that installation of the SONGS Critical Functions Monitoring System (CFMS) had been completed. NRC acceptance of the CFMS for meeting the SPDS requirement was provided in NRC's letter to SCE dated April 23, 1990 (Reference 99). The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)p. Voiding in the Reactor Coolant System (II.K.2.17, SSER #1, SSER #5)

The licensee proposed to delete this license condition pertaining to the Combustion Engineering Owners Group analysis of the potential for RCS voiding during anticipated transients. SCE's letter to the NRC dated April 28, 1982 (Reference 46), described how this license condition has been satisfied. NRC's letter dated March 8, 1984 (Reference 47), concluded that this requirement had been met. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)q. Revised Model for Small-Break LOCA (Loss Of Coolant Accidents) (II.K.3.30, SSER #1, SSER #4, SSER #5)

The licensee proposed to delete this license condition pertaining to the submittal of results of the Combustion Engineering Owners Group effort on model justification or a revised analytical

model for Small-Break LOCA. By letter dated July 17, 1987 (Reference 49), the NRC staff found that the requirements of this license condition had been met. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)r. Plant-Specific Calculations for Compliance with 10 CFR Section 50.46 (II.K.3.30, SSER #1)

The licensee proposed to delete this license condition pertaining to supplemental plant-specific analysis to verify compliance with 10 CFR 50.46, using the revised models developed under Item II.K.3.30. By letter dated July 17, 1987 (Reference 49), the NRC staff found that the requirements of this license condition had been met. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(19)s. Improving Licensee Emergency Preparedness (III.A.2, SSER #1, SSER #5)

The licensee proposed to delete this license condition pertaining to the upgraded emergency support facilities. The requirements of this license condition have been satisfied. Item 1 was met by SCE's letter to NRC dated March 31, 1982 (Reference 50). Item 2 was stated to be operational with two equipment exceptions in an SCE letter to NRC dated December 15, 1982 (Reference 51). SCE stated in a follow up letter to the NRC dated May 13, 1983 (Reference 52), that one of the exceptions identified in the December 15, 1982 letter was completed, and the remaining outstanding item was installation by the NRC of the red and green telephones. These telephones were installed in 1982 and subsequently replaced in 1992 by the current FTS-2000 system for emergency telephone communication with the NRC, in response to NRC GL 91-14. Since the upgraded emergency support facilities were operational, as discussed above, requirement 3 to maintain interim emergency support facilities was superseded. The NRC staff has confirmed that the March 31, 1982, December 15, 1982, and May 13, 1983 letters satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(20)a. & b. Surveillance Program (Section 1.12, SSER #5)

The licensee proposed to delete this license condition requiring (a) a review of the surveillance procedures applicable to the change of mode, and (b) to determine that the procedures demonstrate the operability of the required systems with respect to all acceptance criteria defined in the TSs. SCE's letters to NRC dated February 16, 1982, (Reference 53) March 11, 1982 (Reference 54), April 14, 1982 (Reference 55), May 6, 1982 (Reference 56), July 23, 1982 (Reference 57), and September 3, 1982 (Reference 58), satisfy both "a" and "b" for SONGS Unit 2 entry into Modes 6, 5, 4, 3, 2, and 1, respectively. The NRC staff has confirmed that the above references satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(21) Laboratory Instrumentation (Section 1.12, SSER #5)

The licensee proposed to delete this license condition pertaining to the laboratory instrumentation described in Sections 11.5.2.2.2 and 12.5.2.2.1 of the Final Safety Analysis Report. NRC inspection report 361/82-05, dated April 27, 1982 (Reference 59) determined that all prior comments and unresolved items relative to radio chemical measures and procedures had been addressed and resolved. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(22) Design Verification Program (Section 3.7.4, SSER #5)

The licensee proposed to delete this license condition pertaining to the submittal of the final report of the Design Verification Program being conducted by the General Atomic Company. The NRC concluded that the design verification program was acceptably designed and implemented in Section 3.7.4 of SONGS, Units 2 and 3 SER Supplement 6 dated June 30, 1982 (Reference 62). The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(23) Emergency Preparedness Conditions

The licensee proposed to delete this license condition pertaining to emergency preparedness. There are four requirements related to this license condition. The basis for deletion of each item is discussed below:

Item a - SCE's letter to the NRC dated February 4, 1983 (Reference 63), provided documentation that the license conditions were satisfied for Items a.i, a.ii, and a.iii. The NRC staff has confirmed that the above reference satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

Item b - The NRC staff agrees that Item b can be deleted since it was stated to ensure satisfactory preparedness progress upon the NRC granting full power operation. The plant is now operating at full power.

Item c - The Atomic Safety and Licensing Board ruling on Off-Site Medical Services dated August 12, 1983 (Reference 64) confirmed compliance with Item c. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

Item d - SCE's letter to the NRC dated July 1, 1983 (Reference 65), provided documentation that the d.i and d.ii license conditions were satisfied. The NRC staff has confirmed that the above reference satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(24) RCS Depressurization System, PORVs (Power Operated Relief Valves)

The licensee proposed to delete this license condition pertaining to the capability of SONGS 2 for rapid depressurization and decay heat removal without PORVs. SCE's letters to NRC dated June 22, 1983 (Reference 66), and September 21, 1983 (Reference 67), provided information which satisfied the requirements of this license condition. The NRC staff has confirmed that the above references satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(25) Qualification of Auxiliary Feedwater Pump Motor Bearings

The licensee proposed to delete this license condition pertaining to a proposed hardware modification and its schedule for implementation that will increase the reliability of the AFW motor-driven pumps. SCE's letter to the NRC dated March 7, 1983 (Reference 68), provided information on daily visual inspections of the AFW pump turbine steam line and details of planned implementation of a lube oil system to satisfy the requirements of this license condition. SCE's letters to the NRC dated April 2, 1984 and August 8, 1984 (References 115 and 116, respectively) provided revised design information on the gravity-feed AFW motor lube oil

system. The lube oil system was installed by DCPs 2/3-127.M (Reference 69), rendering augmented in-service inspection (ISI) performance unnecessary; the modification completed all actions related to the license condition. This system is discussed in SONGS Unit 2's Licensee Event Report (LER) No. 90-015, submitted in SCE's letter to NRC dated January 18, 1991 (Reference 117), which states this system was installed pursuant to the license condition. The NRC staff has confirmed that the above references satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

#### Paragraph E.

It is proposed that an asterisk be added after the text "Safeguards Contingency Plan," to relate it to the associated footnote. This proposed change is editorial in nature and therefore is acceptable.

#### Paragraph G.

To reflect the above proposed license condition deletions it is proposed to revise the first sentence of paragraph G from "SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3), through C(11), C(13), C(15) through C(22), and F..." to "SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3), and F..." As the NRC staff has determined that license conditions C(4), through C(13), C(15) through C(22), can be deleted; the deletion of the reporting requirement is purely administrative and is acceptable.

### 2.2 SONGS Unit 3

#### 2.C.(4) Intentionally Deleted

This title will now remain. As the condition was previously deleted, it will remain to maintain the current license condition numbering sequence to provide an easy reference to past license conditions.

#### 2.C.(5) Environmental Qualification (Section 3.11, SER, SSER #3, SSER #4)

This title will now remain. As the condition was previously deleted, it will remain to maintain the current license condition numbering sequence to provide an easy reference to past license conditions.

#### 2.C(6) High Burn up Fission Gas Release (Section 4.2.2.2, SER)

As required by this license condition, revised analyses for SONGS, Units 2 and 3 High Burn up Fission Gas Release and associated methodology were submitted to the NRC by SCE's letter dated June 7, 1984. The NRC approved this report on August 3, 1990, with a caveat that the conclusions in the analyses must remain valid in subsequent reload analyses and the information supporting these conclusions remain in an audible form and inspectable. The "auditable" requirements required by the NRC in letter dated August 3, 1990, are met by the fuel performance reload analyses generated by SCE using topical report SCE-9801-A-P, "Reload Analysis Methodology for the San Onofre Nuclear Generating Station Units 2 and 3," submitted to the NRC by SCE by letter dated November 30, 1998 (Reference 5). This topical report was approved by the NRC's Safety Evaluation letter to SCE dated June 2, 1999 (Reference 6). The NRC's August 3, 1990, requirement for SCE to seek NRC staff approval for any changes is met as described in topical report SCE-9801-A-P, Section 4.5.3, third paragraph, which specifies that "Methodology changes that are not compliant with the NRC approved methodology ... will not be implemented without prior NRC approval." The NRC staff agrees that since any future changes must be reviewed and approved by the staff, the

“auditable” requirements of the staff’s August 3, 1990, approval are met. The NRC staff has determined that the license condition has been fulfilled and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(7) Low Temperature Overpressurization Protection (Section 5.2.2.2, SER)

The licensee proposed to delete this license condition pertaining to the TS requirements for steam generator/RCS delta T and shutdown cooling system initiation temperature limits. SCE by letter dated June 12, 1989 (Reference 90), provided a report in accordance with this license condition, prior to five effective power years of plant operation, verifying that the original steam generator/RCS delta T and the SDCS initiation temperature limits were still suitably conservative. The NRC staff by letter dated September 19, 1989 (Reference 89), confirmed the results of this report. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(8) Volume Control Tank Outlet Valve Control Logic - Safety Actuation (Section 7.3.5, SSER #4)

The licensee proposed to delete this license condition pertaining to the volume control tank outlet valve control logic. NRC Inspection Reports No. 83-03 and 83-04 dated March 14, 1983 (Reference 111), paragraph 4, verified completion of this design modification. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(9) Compliance with RG 1.97

The licensee proposed to delete this license condition pertaining to a proposed implementation schedule, for meeting Revision 2 of RG 1.97. NRC’s letter to SCE dated May 26, 1987 (Reference 14), transmitted the SE for SONGS, Units 2 and 3 for conformance to RG 1.97, Revision 2. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(10) Control System Failures (Section 7.7, SER, SSER #4)

The licensee proposed to delete this license condition pertaining to control system failures caused by high energy line breaks, and by failures of any power sources, sensor, or sensor impulse lines which provide power or signals to two or more control systems. NRC’s letter to SCE dated August 17, 1988 (Reference 18) concluded that no further evaluation was required and that this license condition had been satisfied. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(11) Diesel Generator Modifications (Section 8.3.1, SER)

The licensee proposed to delete this license condition pertaining to the installation of a heavy duty turbocharger gear drive assembly on the emergency diesel generators. NRC Inspection Report Nos. 83-39 and 83-40 dated January 19, 1984 (Reference 112), paragraph 5, verified completion of this design modification. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(12) Fire Protection

This change is no longer needed as the numerical sequence for the license conditions will be maintained.

2.C.(13) Turbine Disk Inspection (Section 10.2.2, SER)

The licensee proposed to delete this license condition pertaining to inspections of the bores of the low pressure turbine disc for ultrasonic indications. General Electric Company of England inspected the bores of the low pressure turbine disc for ultrasonic indications prior to startup following the second refueling outage to satisfy this license condition. SCE's letter to the NRC dated March 23, 1987 (Reference 102), informed the NRC that these inspections were performed and included the inspection report. The NRC staff has confirmed that the March 23, 1987, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(14) Radioactive Waste System (Section 11.1, SER, SSER #5)

The licensee proposed to delete this license condition pertaining to shipment of "Wet" solid radwaste from the facility. The NRC staff has confirmed that Inspection Report No. 50-361/2000-01: 50-362/2000-01 (Reference 118 L), inspection report item R1c and LCS Section 5.0.103.2.2 satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable. See discussion item 2.C.(16), Unit 2 for details.

2.C.(15) Purge System Monitors (Section 11.3, SER, SSER #5)

The licensee proposed to delete this license condition pertaining to having equipment be operable for the capability to continuously monitor and sample the containment purge exhaust directly from the purge stack. By SCE's letter to the NRC dated March 2, 1984 (Reference 23), the licensee informed the NRC that effluent monitors were installed. DCP 2/3-53N "Addition of Containment Purge System Monitors," (Reference 24) verified these changes were made in Units 2 and 3 in 1986 and 1988 respectively. The NRC staff has confirmed that the March 2, 1984, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(16) Initial Test Program (Section 14, SER)

The licensee proposed to delete this license condition pertaining to the post-fuel loading initial test program as set forth in Section 14 of the SONGS, Units 2 and 3 Final Safety Analysis Report, as amended. SCE's letter to the NRC dated May 25, 1984 (Reference 98), subsequently provided the final supplementary report to the Startup Report which addressed testing from issuance of the operating license through completion of startup testing. The NRC staff has confirmed that the May 25, 1984, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)a. Procedures for Transients and Accidents (I.C.1, SSER, #1, SSER #2, SSER #5)

The licensee proposed to delete this license condition pertaining to emergency procedure guidelines. Emergency procedures have been implemented to satisfy the requirements of this license condition as verified in NRC's letters to SCE dated August 3, 1988 (Reference 32), and May 31, 1990 (Reference 33). The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)b. Procedures for Verifying Correct Performance of Operating Activities (I.C.6, SSER #1)

The licensee proposed to delete this license condition pertaining to a system for verifying the correct performance of operating activities. The independent verification requirements have been incorporated in San Onofre procedures and programs. The NRC closed this license condition in NRC Unit 2/3 inspection report 82-39/82-31 dated December 7, 1982 (Reference 34) (item 14.c.). The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)c Control Room Design Review (I.D.1, SSER #1)

The licensee proposed to delete this license condition pertaining to DCRDR. In NRC's letter to SCE dated October 5, 1982, "NRC Inspection Reports Nos. 50-361/82-27 and 50-362/82-19" (Reference No. 36), Item 3c, "(Open) Item I.D.1, Control Room Design Review," the inspector confirmed that all items had been satisfactorily resolved, except for: the primary makeup pump flow controller being mislabeled, an error in the placement of TS limit indicating arrows for Containment Pressure and Refueling Water Storage Tank Level, fuel load pattern recognition information needed to be incorporated into emergency operating procedures, operator training in the use of the process computer was required, and the open/closed legends for hydrogen purge control on the heating, ventilation, and air conditioning (HVAC) panel were reversed. In NRC Inspection Reports 50-361/82-39 and 50-362/82-31 dated December 7, 1982 (Reference No. 34), Item 14.b, "(Closed) Item I.D.1 - Control Room Design Review," the inspector verified the five items discussed in Inspection Report 50-362/82-19 (above) were satisfactorily completed prior to fuel load. The NRC SE on the DCRDR was provided to SCE by letter dated December 15, 1986 (Reference 37). The SE concluded that the DCRDR activities of SCE met all requirements. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)d. Post-Accident Sampling System (NUREG-0737 Item II.B.3)

The licensee proposed to delete this license condition pertaining to the post-accident sampling program. By letter dated March 26, 2001, the NRC had approved the removal of this license condition by License Amendment No. 169. As the NRC staff has previously reviewed and documented its determination that this license condition can be removed, the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)e. Direct Indication of Safety Valve Position (II.D.3, SSER #1)

The licensee proposed to delete this license condition pertaining to the safety valve position indication system. SCE's letter to the NRC dated April 22, 1982 (Reference 44) confirmed that the safety valve position indication system had been appropriately seismically and environmentally qualified to meet the requirements of this license condition. The NRC staff has confirmed that the April 22, 1982, letter satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)f. AFW Pump 48-Hour Endurance Test (II.E.1.1, SSER #11)

The licensee proposed to delete this license condition pertaining to a 48-hour endurance test of all AFW pumps. Prior to exceeding 5 percent power SCE conducted 48-hour endurance tests on the Unit 3 AFW pumps. The test results were submitted to the NRC by SCE's letter dated September 9, 1983 (Reference 100) and NRC to SCE letter dated August 27, 1984 (Reference 101), verified compliance. The NRC staff has previously reviewed and documented

its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)g. Emergency Power Supply for Pressurizer Heaters (II.E.3.1, SSER #1, SSER #5)

The licensee proposed to delete this license condition pertaining to implementation of procedures to preclude the automatic reapplication of pressurizer heaters to Class 1E buses upon SIAS reset. NRC Inspection report 82-23 and 82-13 dated July 14, 1982 (Reference 113), item 2, documented NRC inspection of applicable procedures and concluded that the procedures had adequate provisions to preclude the unintentional automatic re-loading of pressurizer heaters onto Class 1E buses on SIAS reset. DCP 2/3-247J (Reference 107), was implemented to modify the pressurizer heater control circuits to prevent automatic power restoration to these devices. The NRC staff has confirmed that DCP 2/3 247J satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)h. Inadequate Core Cooling (ICC) Instrumentation (II.F.2, SSER #1, SSER #2, SSER #4)

The licensee proposed to delete this license condition pertaining to the subcooling monitors, the incore detector assemblies, the SPDS, the cables for the core exit thermocouples, and the heated junction thermocouple probe and associated process instrumentation. The actions for equipment required by this license condition were determined to be completed by NRC inspection. Item 14.a. of NRC inspection reports 50-361/82-39 and 50-362/82-31 dated December 7, 1982 (Reference 34), verified that the required actions had been completed for all items except the SPDS. The safety parameter display requirement (Item 4) was satisfied in response to NRC GL 89-06 regarding certification of implementation of a SPDS. SCE's letter to the NRC dated January 31, 1991 (Reference 105), informed the NRC that installation of the SONGS CFMS had been completed. NRC acceptance of the CFMS for meeting the SPDS requirement was provided in NRC's letter to SCE dated April 23, 1990 (Reference 99). The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)i. Plant-Specific Calculations for Compliance with 10 CFR Section 50.46 (II.K.3.31, SSER #1)

The licensee proposed to delete this license condition pertaining to supplemental plant-specific analysis to verify compliance with 10 CFR 50.46, using the revised models developed under item II.K.3.30. By letter dated July 17, 1987 (Reference 49), the NRC staff found that the requirements of this license condition had been met. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(17)j. Improving Licensee Emergency Preparedness (III.A.2, SSER #1, SSER #5)

The licensee proposed to delete this license condition pertaining to the upgraded emergency support facilities. The requirements of this license condition for implementing upgraded emergency support facilities have been satisfied. Upgraded facilities were completed to satisfy item 1 with two equipment exceptions as stated in an SCE to NRC letter dated December 15, 1982 (Reference 51). SCE stated in a follow up letter to the NRC dated May 13, 1983 (Reference 52), that one of the exceptions identified in the December 15, 1982, letter was completed, and the remaining outstanding item was installation by the NRC of the red and green telephones. These telephones were installed in 1982 and subsequently replaced in 1992

by the current FTS-2000 system for emergency telephone communication with the NRC, in response to NRC GL 91-14. Since the upgraded emergency support facilities were operational, as discussed above, requirement 2 to maintain interim emergency support facilities was superseded. The NRC staff has confirmed that the December 15, 1982 and May 13, 1983, letters satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

#### 2.C.(18) Emergency Preparedness Conditions

The licensee proposed to delete this license condition pertaining to emergency preparedness. There are four requirements related to this license condition. The basis for deletion of each item is discussed below:

Item a - SCE's letter to the NRC dated February 4, 1983 (Reference 63), provided documentation that the license conditions were satisfied for items a.i, a.ii, and a.iii. The NRC staff has confirmed that the above reference satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

Item b - The NRC staff agrees that Item b can be deleted since it was stated to ensure satisfactory preparedness progress upon the NRC granting full power operation. The plant is now operating at full power.

Item c - This item had been previously deleted.

Item d - SCE's letter to the NRC dated July 1, 1983 (Reference 65), provided documentation that the d.i and d.ii license conditions were satisfied. The NRC staff has confirmed that the above reference satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

#### 2.C.(19) RCS Depressurization System, PORVs

The licensee proposed to delete this license condition pertaining to the capability of SONGS 2 for rapid depressurization and decay heat removal without PORVs. SCE's letters to NRC dated June 22, 1983 (Reference 66), and September 21, 1983 (Reference 67), provided information which satisfied the requirements of this license condition. The NRC staff has confirmed that the above references satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

#### 2.C.(20) Qualification of AFW Pump Motor Bearings

The licensee proposed to delete this license condition pertaining to a proposed hardware modification to add a lubrication oil cooling system for the AFW pump motor bearings. SCE's letter to the NRC dated March 7, 1983 (Reference 68) provided information on daily visual inspections of the AFW pump turbine steam line and details of planned implementation of a lube oil system to satisfy the requirements of this license condition. SCE's letters to the NRC dated April 2, 1984 and August 8, 1984 (References 115 and 116, respectively) provided revised design information on the gravity-feed AFW motor lube oil system. The lube oil system was installed by DCPs 2/3-127.M (Reference 69), rendering augmented ISI performance unnecessary; the modification completed all actions related to the license condition. This system is discussed in SONGS Unit 2 LER No. 90-015, submitted in SCE to NRC letter dated January 18, 1991 (Reference 117), which states this system was installed at SONGS Unit 3 pursuant to the license condition. The NRC staff has confirmed that the above references

satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(21)a. & b. Surveillance Program (Section 1.12, SSER #5)

The licensee proposed to delete this license condition requiring (a) a review of the surveillance procedures applicable to the change of mode, and (b) to determine that the procedures demonstrate the operability of the required systems with respect to all acceptance criteria defined in the TS. SCE to NRC letters dated November 15, 1982 (Reference 70), November 29, 1982 (Reference 71), December 27, 1982 (Reference 72), January 14, 1983 (Reference 73), August 26, 1983 (Reference 74), and September 14, 1983 (Reference 75), satisfy both "a" and "b" for Unit 3 entry into Modes 6, 5, 4, 3, 2, and 1, respectively. The NRC staff has confirmed that the above references satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(22) Auxiliary Building Ventilation System

The licensee proposed to delete this license condition pertaining to modifications to the auxiliary building ventilation. SCE to NRC letter dated November 5, 1982 (Reference 85), documented several SCE commitments concerning planned temporary and permanent corrective actions to improve the design and operation of the Auxiliary Building Ventilation System. These actions were completed and the associated hardware changes were installed by implementation of DCP 790M (Reference 76), and DCP 790.1 dated August 7, 1984 (Reference 118 N). The NRC staff has confirmed that the above references satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(23) Fuel Assembly Shoulder Gap Clearance (SCE letter of July 25, 1983)

The licensee proposed to delete this license condition pertaining to the demonstration that the existing fuel element assembly (FEA) has sufficient available shoulder gap clearance for at least the next cycle of operation. SCE's letter to the NRC dated May 23, 1986 (Reference 77), satisfied this license condition, as confirmed by NRC's letter to SCE dated August 25, 1986 (Reference 78). However, the NRC's letter only addresses the issue for Cycles 3 and 4. In SCE to NRC letter dated March 11, 1991, "Fuel Assembly Shoulder Gap Adequacy" (Reference 118, G), the NRC staff requested closure of license condition 2.C.(23) based on the acceptable shoulder gap analysis results for the first five cycles. SCE determined that the FEA shoulder gap analysis results were acceptable for the 16 x 16 fuel design with a FEA shoulder gap clearance of 2.382 inches (vs. 1.332 inches initially). SCE committed to continue to evaluate the adequacy of the FEA shoulder gap as part of the SONGS, Units 2 and 3 reload analyses. NRC to SCE letter dated March 26, 1991, "Fuel Assembly Shoulder Gap Adequacy" (Reference 118 H), the NRC staff responded to the March 11, 1991 SCE letter above, concurring that the shoulder gap clearance provided was adequate for the design life of the fuel and confirming that license condition 2.C.(23) had been met. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(24) Isolation Capability for Primary Emergency Operations Facility (EOF)

The licensee proposed to delete this license condition pertaining to the primary EOF ventilation system. SCE's letters to the NRC dated January 9, 1984 (Reference 79), and March 14, 1984 (Reference 80), describe the EOF HVAC control logic modifications which were completed to satisfy this license condition. The NRC staff has confirmed that the above references satisfies this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(25) Correction of Core Protection Calculators (CPC) Software Error

The licensee proposed to delete this license condition pertaining to the software error in the CPC. The commitment date to correct an error in the CPC and Control Element Assembly Calculator software was revised to the first available outage of sufficient duration after May 1, 1984, by SCE to NRC letter dated November 16, 1983 (Reference 82). TS changes to implement the new software were requested by SCE to NRC letter dated April 10, 1984 (Reference 83). By letter dated January 9, 1985 (Reference 84), the NRC staff approved this software per License Amendments Nos. 30 and 19 for Units 2 and 3, respectively. The NRC staff has previously reviewed and documented its determination that the license condition has been satisfied and thus the deletion of this license condition is purely administrative and is acceptable.

2.C.(26) AFW System Monthly Reports

The licensee proposed to delete this license condition pertaining to the reporting of any occurrences resulting in the degradation (including, but not limited to component failures, maintenance errors, and operator errors) of the AFW system until the first refueling. Reports as required by this license condition were submitted by SCE to the NRC by letters dated November 9, 1983; December 23, 1983; February 29, 1984; March 20, 1984; April 26, 1984; September 13, 1984; October 18, 1984; January 14, 1985; February 6, 1985; May 8, 1985; June 17, 1985, and October 25, 1985. On September 16, 1985 Unit 3 entered its first refueling outage having completed the requirement of this license condition. The NRC staff has confirmed that the above references satisfy this license condition and thus the deletion of this license condition is purely administrative and is acceptable.

Paragraph E.

It is proposed that an asterisk be added after the text "Safeguards Contingency Plan," to relate it to the associated footnote. This proposed change is editorial in nature and therefore is acceptable.

Paragraph G.

To reflect the above proposed license condition deletions it is proposed to revise the first sentence of paragraph G from "SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3), through C(11), (C(11), through C(22), and F..." to "SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3), and F..." As the NRC staff has determined that license conditions C(4), through C(13), C(15) through C(22), can be deleted, the deletion of the reporting requirement is purely administrative and is acceptable.

Paragraph K.

The licensee proposed to delete this license condition pertaining to the final resolution of the pending litigation involving Table S-3. The Supreme Court decision overturned the Court of Appeals decision that had found the NRC's rules for evaluation of a nuclear power plant's fuel cycle (that are based on Table S-3) arbitrary, capricious, and inconsistent with the National Environmental Policy Act. The case is *Baltimore Gas & Electric Co., et al., v. Natural Resources Defense Council (NRDC), Inc.*, 462 U.S. 87 (1983) (Reference 110). This case was decided together with *NRC v. NRDC* and one other case. The Supreme Court decision upheld the NRC's rules, with which SCE has been complying since 1982. The NRC staff confirmed that the 462 U.S. 87 (1983) case upheld the NRC rule that permanent storage of nuclear waste should be assumed to have no environmental impact and should not affect licensing decisions.

As the above reference satisfies this license condition, the deletion of this license condition is purely administrative and is acceptable.

#### Attachment 1 to the Unit 3 OL

The licensee proposed to delete this license condition pertaining to discrepant inputs to the Core Protection Calculator from Reactor Coolant Pump shaft speed Control Element Assembly position indication. The final report on Core Protection Calculator, submitted as an attachment to the July 19, 1982, SCE to NRC letter (Reference 86), described corrective action to resolve this item. Subsequently, Item 3 of NRC Inspection Reports Nos. 83-11 and 12 dated April 14, 1983 (Reference 87), determined that acceptable corrective action had been completed and closed LER Number 82-034 [submitted to the NRC by SCE to NRC letter dated July 2, 1982] (Reference 88), on this item. As the NRC staff has previously reviewed and documented its determination that this license condition can be removed, the deletion of this license condition is purely administrative and is acceptable.

### 2.3 CONCLUSION

The NRC staff has reviewed the licensee identified reference documents and has determined that the subject license conditions have been satisfied and therefore, can be deleted. Further, no physical changes to the plant, or the way it is operated, are being made as a result of these proposed FOL changes.

It should be noted that Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, paragraph XVII, Quality Assurance Records, specifies that:

“Sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: Operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses. The records shall also include closely-related data such as qualifications of personnel, procedures, and equipment. Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted. Records shall be identifiable and retrievable. Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention, such as duration, location, and assigned responsibility.”

Accordingly, these records, as referenced for the basis of the deletion of the above license conditions, are subject to the Commission's future inspection and audits, if any.

Based on the above discussions, the NRC staff finds the proposed change to the SONGS, Units 2 and 3 FOLs to delete the identified completed license conditions to be acceptable. Other changes are editorial in nature and do not involve any changes to the content of the license conditions and, therefore, are also acceptable.

### 3.0 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.

#### 4.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an Environmental Assessment and Finding of No Significant Impact was published in the *Federal Register* on \_\_\_\_\_, 2002 ( FR \_\_\_\_\_).

Accordingly, based on the Environmental Assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

#### 5.0 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.

Attachment: References

Principal Contributor: A. Wang

Date: March 27, 2002

## REFERENCES

1. SCE letter to NRC dated June 7, 1984, "Analysis of Unit 2 Fission Gas Pressure for Burnups Greater than 20,000 MWD/T."
2. SCE letter to NRC dated November 21, 1989, "Cycle 5 Operation at Extended Burnup - Fuel Pin Fission Gas Pressure and Fuel Assembly Shoulder Gap Adequacy."
3. SCE letter to NRC dated July 11, 1990, "Plant-Specific Use of Topical Report CEN-372-P, Fuel Rod Maximum Allowable Gas Pressure."
4. NRC letter to SCE dated August 3, 1990, "Plant-Specific Use of Topical Report CEN-372-P, Fuel Rod Maximum Allowable Gas Pressure."
5. SCE letter to NRC dated November 30, 1998, "June 16, 1998 Meeting between SCE, Asea Brown Boveri Combustion Engineering (ABB CE), and NRC Staff at White Flint to Discuss Reload Analysis Technology Transfer from ABB CE to SCE for San Onofre."
6. NRC letter to SCE dated June 2, 1999, "Evaluation of Reload Analysis Methodology Technology Transfer."
7. NRC letter to SCE dated June 23, 1989, "License Condition 2.C.7, Low Temperature Overpressurization."
8. SCE letter to NRC dated May 8, 1989, "License Condition 2.C.7, Low Temperature Overpressurization."
9. Design Change Package (DCP) 2/3-952.1M, "Control Room Pressure Boundary Modification."
10. NRC letter to SCE dated June 17, 1982, "NRC Inspection Reports Nos. 82-09 and 82-17."
11. Design Change Package (DCP) 2-203J, "Revise Volume Control Tank Outlet Valve Control Circuit to Prevent Reopening on SIAS Reset."
12. SCE letter to NRC dated May 13, 1982, "Position to Comply with Operating License Condition C.(11) and Submittal of Program and Implementation Schedule to Meet Regulatory Guide 1.97, Rev. 2."
13. SCE letter to NRC dated July 26, 1984, "Response to Exceptions of Conformance to Regulatory Guide 1.97."
14. NRC letter to SCE dated May 26, 1987, "Safety Evaluation for Conformance to Regulatory Guide 1.97, Rev. 2."
15. SCE letter to NRC dated April 1, 1983, "Response to NRC Question regarding Qualification of Control Systems."

16. SCE letter to NRC dated April 20, 1983, "Revised Response to NRC Question Regarding License Conditions Relative to High Energy Line Break."
17. SCE letter to NRC dated February 20, 1987, "License Conditions 2.C(12) and 2.C.(10), Volume Control Tank Outlet Valve Control Logic - Safety Actuation."
18. NRC letter to SCE dated August 17, 1988, "Safety Evaluation Report for License Condition 2.C(12) and 2.C.(10), Volume Control Tank Outlet Valve Control Logic - Safety Actuation."
19. Design Change Package (DCP) 2/3-1020SM, "Replace Existing Standard Duty Turbochargers with Heavy Duty Turbochargers on all Emergency Diesel Generator Engines."
20. SCE letter to NRC dated June 20, 1986, "Inspection Reports of Low Pressure turbine Rotor Discs."
21. SCE letter to NRC dated April 19, 1984, "Results of Meeting Regarding Waste Solidification Process Control Program."
22. NRC letter to SCE dated April 24, 1984, "Interim Approval of Process Control Program (PCP)."
23. SCE letter to NRC dated March 2, 1984, "Proposed Changes to Appendix A Technical Specifications to Revise Technical Specifications Relating to Radiation and Radioactive Effluent Monitoring Instrumentation, Radioactive Effluents and the Radiological Environmental Monitoring Program."
24. Design Change Package (DCP)-2/3 53N, "Containment Purge System Monitors."
25. SCE letter to NRC dated February 1, 1983, "Evaluation Relative to the Method for Initiating the 80% Loss of Flow Natural Circulation Test."
26. SCE letter to NRC dated July 14, 1983, "Request for Concurrence Regarding Power Ascension Testing Sequence."
27. NRC letter to SCE dated May 23, 1983, "San Onofre 2 Startup Testing."
28. NRC letter to SCE dated May 12, 1983, "Proposed Deletion of Integral Test of CPC Functional Capability."
29. NRC letter to SCE dated July 29, 1983, "San Onofre 2 Turbine Trip Test A."
30. SCE letter to NRC dated October 21, 1983, "Supplement II to Startup Report."

31. NRC letter to SCE dated March 15, 1982, "NRC Inspection 82-10 for San Onofre Unit 2."
32. NRC letter to SCE dated August 3, 1988, "License Condition 2.C(19)d, Procedures for Transients and Accidents, for San Onofre 2 and License Condition 2.C(17)a for San Onofre Unit 3."
33. NRC letter to SCE dated May 31, 1990, "Safety Evaluation for the San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, Procedures Generation Package."
34. NRC letter to SCE dated December 7, 1982, "NRC Inspection Reports Nos. 82-39/82-31."
35. SCE letter to NRC dated August 19, 1982, "Corrective Actions Identified in License Condition (19)f, Control Room Design Review ."
36. NRC letter to SCE dated October 5, 1982, "NRC Inspection Reports Nos. 82-19 and 82-27."
37. NRC letter to SCE dated December 15, 1986, "Safety Evaluation Report on Detailed Control Room Design Review."
38. SCE letter to NRC dated April 15, 1982, "Natural Circulation Test Program."
39. SCE letter to NRC dated April 27, 1982, "Reactor Coolant Gas Vent System."
40. SCE letter to NRC dated April 14, 1983, "Results of PASS Demonstration Test."
41. SCE letter to NRC dated October 2, 1992, "Amendment Application Nos. 119 and 103, Changes to License Conditions 2.C.(19)i and 2.C.(17)d, Post Accident Sampling System."
42. NRC letter to SCE dated April 6, 1993, "Issuance of Amendment Nos. 103 and 92", Changes to License Conditions 2.C.(19)i and 2.C.(17)d, Post Accident Sampling System."
43. SCE letter to NRC dated June 29, 1982, "SONGS 2/3 Pressurizer Safety Valve Operability and Safety Valve Discharge piping Adequacy Report."
44. SCE letter to NRC dated April 22, 1982, "Environmental and Seismic Qualification of Safety Valve Position Indication System."
45. SCE Audit Report No. SCES-41-83 dated July 31, 1983, "Compliance with SONGS 2 and 3 Operating License Conditions."
46. SCE letter to NRC dated April 28, 1982, "Submittal of CEN-199, Effects of Vessel Head Voiding During Transients and Accidents in CE NSSS's," March 1982.

47. NRC letter to SCE dated March 8, 1984, "Review of NUREG-0737 Item II.K.2.17, Voiding in Reactor Coolant System During Transients."
48. SCE letter to NRC dated May 21, 1987, "Resolution of Small-Break LOCA and Operating License Conditions."
49. NRC letter to SCE dated July 17, 1987, "Completion of NUREG-0737 Items II.K.3.30 and II.K.3.31," Regarding License Conditions 2.C.(19)q. and 2.c.(19)r., "Revised Model for Small-Break LOCA (Loss Of Coolant Accident)" and "Plant-Specific Calculations for Compliance with 10 CFR Section 50.46," respectively.
50. SCE letter to NRC dated March 31, 1982, "Submittal of Report: SONGS 2 and 3 Emergency Response Facilities."
51. SCE letter to NRC dated December 15, 1982, "Compliance with License Condition 2.C(19)s.1, SONGS 2 and 3 Emergency Support Facilities."
52. SCE letter to NRC dated May 13, 1983, "Supplement 1 to NUREG-0737, Requirements for Emergency Response Capability."
53. SCE letter to NRC dated February 16, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode (Mode 6), Unit 2."
54. SCE letter to NRC dated March 11, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 2."
55. SCE letter to NRC dated April 14, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 2."
56. SCE letter to NRC dated May 6, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 2."
57. SCE letter to NRC dated July 23, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 2."
58. SCE letter to NRC letter dated September 3, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 2."
59. NRC letter to SCE dated April 27, 1982, "Inspection Report No. 82-05."
60. SCE letter to NRC dated April 5, 1982, "Request for Expedited Review of Report: Independent Verification of SONGS 2&3 Seismic Design and Quality Assurance Program Effectiveness."
61. NRC to SCE letter dated April 20, 1982, "Summary of Meeting to Discuss Final Report on GA Independent Design Review Program"
62. NRC letter to SCE dated June 30, 1982, "Issuance of Supplement No. 6 to Safety Evaluation Report."

63. SCE letter to NRC dated February 4, 1983, "Status of Emergency Preparedness Conditions."
64. August 12, 1983 Atomic Safety and Licensing Board Memorandum and Order/Ruling on Off-site Medical Services Issue.
65. SCE letter to NRC dated July 1, 1983, "U2 Emergency Preparedness License Conditions 2.C(23)d.i and 2.C(23)d.ii and U3 Emergency Preparedness License Conditions 2.C(18)d.i and 2.C(18)d.ii."
66. SCE letter to NRC dated June 22, 1983, "Response to NRC Questions on Depressurization and Decay Heat Removal."
67. SCE letter to NRC dated September 21, 1983, "Submittal of Revised Report CEN-239, Depressurization and Decay Heat Removal Responses to NRC Questions."
68. SCE letter to NRC dated March 7, 1983, "Response to Request for Information on AFW Pump Motor Bearing Qualification and Correction of CPC Software Error."
69. Design Change Package (DCP) 2/3-127.M, "Gravity Lube Oil System for Aux. Feed Pump Motor Bearing Cooling."
70. SCE letter to NRC dated November 15, 1982, "Request for License to Load Fuel and Commence Initial Facility Testing Up to 5% of Rated Thermal Power, Unit 3."
71. SCE letter to NRC dated November 29, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 3."
72. SCE letter to NRC dated December 27, 1982, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 3."
73. SCE letter to NRC dated January 14, 1983, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 3."
74. SCE letter to NRC dated August 26, 1983, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 3."
75. SCE letter to NRC dated September 14, 1983, "Satisfaction of Surveillance Program Requirements for Initial Entry into an Operational Mode, Unit 3."
76. Design Change Package (DCP) 790.5M, "Fan Control Logic Modification, Radwaste Building."
77. SCE letter to NRC dated May 23, 1986, "Submittal of Report: CEN-332(s)-P, SONGS 2 End of Cycle 2 Shoulder Gap Evaluation."
78. NRC letter to SCE dated August 25, 1986, "Safety Evaluation on Shoulder Gap Clearance."

79. SCE letter to NRC dated January 9, 1984, "Emergency Operations Facility (EOF) Ventilation System."
80. SCE letter to NRC dated March 14, 1984, "Emergency Operations Facility (EOF) Ventilation System."
81. NRC letter to SCE dated May 4, 1984, "Conformance to Regulatory Guide 1.97, Rev. 2."
82. SCE letter to NRC dated November 16, 1983, "Changes to the Core Protection Calculator (CPC)."
83. SCE letter to NRC dated April 10, 1984, "Request for Staff Approval of Proposed Change NPF-10/15-138, CPC and CEAC Software Modifications."
84. NRC letter to SCE dated January 9, 1985, "Issuance of Amendment Nos. 30 and 19, Movable Control Element Assemblies."
85. SCE letter to NRC dated November 5, 1982, "Auxiliary Building Ventilation."
86. July 19, 1982, Final Report on Core Protection Calculator, SONGS 3.
87. NRC letter to SCE dated April 14, 1983, "NRC Inspection Report # 83-11/ 83-12."
88. SCE letter to NRC dated July 2, 1982, "Licensee Event Report 2-82-034, RCP Shaft Speed and Control Element Assembly Inputs to the Core Protection Calculator."
89. NRC letter to SCE dated September 19, 1989, "Closeout of Generic Letter 88-11 and License Condition 2.C.7, Low Temperature Overpressurization Protection."
90. SCE letter to NRC dated June 12, 1989, "Proposed Technical Specification Change (PCN) 292, Pressure-Temperature Limits, Cold Shutdown-Loops Filled, Hot Shutdown, Overpressure Protection System, RCS Temperature."
91. Design Change Package (DCP) 3-203J, "Revise Volume Control Tank Outlet Valve Control Circuit to Prevent Reopening on SIAS Reset."
92. SCE letter to NRC dated June 29, 1983, "Proposed FSAR Modifications, Initial Criticality and Loss of Offsite Power Test."
93. SCE letter to NRC dated September 20, 1983, "Request for Reconsideration of Schedule for Loss of Offsite Power Test."
94. SCE letter to NRC dated October 19, 1983, "Turbine Trip Test."
95. NRC letter to SCE dated August 19, 1983, "Changes to San Onofre 3 Startup Test Program."
96. NRC letter to SCE dated September 28, 1983, "Changes to San Onofre 3 Startup Test Program."

97. NRC letter to SCE dated November 18, 1983, "Approval for Deletion of 100% Power Turbine Trip Test at SONGS 3."
98. SCE letter to NRC dated May 25, 1984, "Startup Report - San Onofre 3."
99. NRC letter to SCE dated April 23, 1990, "Response to NRC Generic Letter 89-06 on the Safety Parameter Display System."
100. SCE letter to NRC dated September 9, 1983 "Satisfaction of License Condition 2.C.(17)f, 48-hour Endurance Test of All Auxiliary Feedwater Pumps."
101. NRC letter to SCE dated August 27, 1984, "Safety Evaluation of 48 Hour AFW Pump Test, San Onofre Unit 3."
102. SCE letter to NRC dated March 23, 1987, "Inspection Reports of Unit 3 Low Pressure Turbine Rotor Discs."
103. "County of Orange Emergency Plan," dated July 1999.
104. "Interjurisdictional Policy # 20, Training" dated September 1989, Revised: April, 1999.
105. SCE letter to NRC dated January 31, 1991, "Safety Parameter Display System."
106. SCE letter to NRC dated January 11, 2001, "Application for Technical Specification Improvement to Eliminate requirements for Post Accident Systems Using the Consolidated Line Item Improvement Process."
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110. Baltimore Gas and Electric Co., et al., v. National Resources Defense Council, Inc., 462 U.S. 87 (1983).
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114. NRC letter to SCE dated December 17, 1984, "NRC Inspection Report Nos. 84-29 and 84-30."

115. SCE letter to NRC dated April 2, 1984, "Qualification of Auxiliary Feedwater Pump Motor Bearings."
116. SCE letter to NRC dated August 8, 1984, "Auxiliary Feedwater Pump Motor Bearing Qualification."
117. SCE letter to NRC dated January 18, 1991, "Licensee Event Report No. 90-015, Revision 1."
118. NRC letter to SCE dated October 5, 1982, "NRC Inspection Reports Nos. 50-361/82-27 and 50-362/82-19."
  - A. NRC letter to SCE dated March 2, 1982, "NRC Inspection Report 50-361/82-09."
  - B. NRC letter to SCE dated March 4, 1983, "NRC Inspection Report 50-361/83-08."
  - C. NRC letter to SCE dated November 16, 1983, "NRC Inspection Report 50-361/83-37."
  - D. NRC letter to SCE dated March 7, 1986, "NRC Inspection Report 50-361/86-02."
  - E. SCE letter to NRC dated February 3, 1982, "Implementation Program for Radiation Monitors" San Onofre Nuclear Generating Station Units 2 and 3.
  - F. NUREG-0712 Supplement No. 5, "Safety Evaluation Report related to the operation of San Onofre Nuclear Generating Station Units 2 and 3" dated February 1982.
  - G. SCE letter to NRC dated March 11, 1991, "Fuel assembly Shoulder Gap Adequacy."
  - H. NRC letter to SCE dated March 26, 1991, "Fuel assembly Shoulder Gap Adequacy."
  - I. SCE letter to NRC dated May 1, 1985, "San Onofre Nuclear Generating Station Units 1, 2, and 3."
  - J. NRC letter to SCE dated June 11, 1985, "Interim Approval of Dewatering of Spent Resin."
  - K. NRC letter to SCE dated August 10, 1995, "Final Draft of the NRC Safety Evaluation Report (SER) on San Onofre Improved Standard Technical Specifications (STS)."
  - L. NRC letter to SCE dated February 9, 2000, "NRC Inspection Report Nos. 50-361/2000-01: 50-362/2000-01."
  - M. San Onofre Units 2 and 3 Licensee Controlled Specifications (LCS) Sections 5.0.103.2.2 Process Control Program (PCP).

- N. Design Change Package (DCP) 790.1 dated August 7, 1984, Design Change Package (DCP) 790.1.