Docket Nos. 50-361 and 50-362

Mr. Kenneth P. Baskin
Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

Mr. Gary D. Cotton
Senior Vice President
Engineering and Operations
San Diego Gas & Electric Company
101 Ash Street
P.O. Box 1831
San Diego, California 92112

Gentlemen:

SUBJECT: ISSUANCE OF AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. NPF-10 AND AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. NPF-15, SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 (TAC NOS. 62844 AND 62845)

The Commission has issued the enclosed amendments to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The amendments add a new license condition in response to your letters of August 29, 1986; November 21, 1986; and February 1, 1988, requesting proposed change PCN-218.

The license condition requires Southern California Edison Company (SCE) to implement an integrated implementation schedule program plan for scheduling all capital modifications.

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

Sincerely,

Donald E. Hickman, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

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

cc w/enclosures:
See next page

DISTRIBUTION

Docket File	BGrimes
NRC & LPDRs	TMeek (8)
PD5 Plant File	EButcher
MVirgilio	ACRS (10)
JLee	GPA/PA
OGC-WF	ARM/LFMB
DHagan	WJones
EJordan	DHickman

DRSP/PD5	DRSP/PD5	OGC	DRSP/D:PD5
JLee	DEHickman:rw		GWKnighton
4/28/89	4/ /89	5/1/89	4/ /89

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May 15, 1989

Docket Nos. 50-361 and 50-362

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Vice President
Southern California Edison Company
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Rosemead, California 91770

Mr. Gary D. Cotton
Senior Vice President
Engineering and Operations
San Diego Gas & Electric Company
101 Ash Street
P.O. Box 1831
San Diego, California 92112

Gentlemen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 72 TO FACILITY OPERATING LICENSE NO. NPF-10 AND AMENDMENT NO. 60 TO FACILITY OPERATING LICENSE NO. NPF-15, SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 (TAC NOS. 62844 AND 62845)

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

Sincerely,

original signed by

Donald E. Hickman, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Enclosures:
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DHagan	WJones
EJordan	DHickman

*See previous concurrence

DRSP/PD5*	DRSP/PD5	OGC*	DRSP/D/PD5
JLee	DEHickman:rw	CPW	GWKnighton
4/25/89	5/15/89	5/01/89	5/15/89

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

May 15, 1989

Docket Nos. 50-361 and 50-362

Mr. Kenneth P. Baskin
Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
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Mr. Gary D. Cotton
Senior Vice President
Engineering and Operations
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P.O. Box 1831
San Diego, California 92112

Gentlemen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 72 TO FACILITY OPERATING LICENSE NO. NPF-10 AND AMENDMENT NO. 60 TO FACILITY OPERATING LICENSE NO. NPF-15, SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 (TAC NOS. 62844 AND 62845)

The Commission has issued the enclosed amendments to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The amendments add a new license condition in response to your letters of August 28, 1986; November 21, 1986; and February 1, 1988, requesting proposed change PCN-218.

The license condition requires Southern California Edison Company (SCE) to implement an integrated implementation schedule program plan for scheduling all capital modifications.

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

Sincerely,

Donald E. Hickman

Donald E. Hickman, Project Manager
Project Directorate V
Division of Reactor Projects III,
IV, V and Special Projects

Enclosures:
1. Amendment No. 72 to License No. NPF-10
2. Amendment No. 60 to License No. NPF-15
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. Kenneth P. Baskin
Southern California Edison Company

San Onofre Nuclear Generating
Station, Units 2 and 3

cc:

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

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 NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 72
License No. NPF-10

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

   A. The application for amendment to the license for San Onofre Nuclear Generating Station, Unit 2 (the facility) filed by Southern California Edison Company (SCE) on behalf of itself and San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (licensees) dated August 28, 1986, and supplemental submittals dated November 21, 1986 and February 1, 1988, 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 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.

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2. Accordingly, the license is amended by adding the following paragraph 2.C(26):

   (26) Integrated Implementation Schedule

   The Southern California Edison Company (SCE) shall implement a plan for scheduling all capital modifications based on the attached Integrated Implementation Schedule Program Plan (the "Plan").

   (1) The Plan shall be followed by the licensee beginning with the effective date of this amendment.

   (2) Changes to completion dates for items identified in Schedules B and C of the Plan do not require a license amendment. Dates specified in Schedule A of the Plan shall be changed only in accordance with applicable NRC procedures.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George W. Knighton

George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Integrated Implementation Schedule
Program Plan

Date of Issuance: May 15, 1989

ATTACHMENT

INTEGRATED IMPLEMENTATION SCHEDULE PROGRAM PLAN
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

I. INTRODUCTION

This document provides the methodology to be used in determining the implementation schedules of capital projects at San Onofre Units 2 and 3.

The program has as its goal the implementation of capital modifications in a stable, controlled manner with the implementation of projects with the greatest potential for enhancing the safe operation of the unit generally given highest priority. The projects of regulatory origin will be ranked using the Westinghouse Analytical Ranking Process to specifically determine the relative potential safety contribution of each modification. The safety ranking will then be used as a primary criterion in scheduling the projects. For betterment projects the priority and schedule will be determined by the Plant Modification Review Committee. The Committee consists of management representatives involved in many areas of plant operation and is the most effective means of determining implementation schedules for those projects necessary for continued or improved plant operation, maintenance, etc.

The program reflects limited outage time, financial and manpower resources, while at the same time implementing those modifications deemed necessary for enhanced plant safety. The plan provides for integration of all future identified work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of SCE.

II. SUMMARY OF PRIORITY DETERMINATION

The Integrated Implementation Schedule is based on a priority determination to assist in maximizing the benefit derived from modifications. Since it is not always possible or beneficial to try to implement a large number of modifications in a single outage, the integrated schedule provides a mechanism for focusing attention on those projects of highest priority.

Regulatory related projects will be ranked using the Westinghouse Analytical Ranking Process. This process was approved for San Onofre Unit 1 by the NRC in a letter from D. G. Eisenhut, to K. P. Baskin, SCE, dated November 16, 1983. SCE will use the same methodology for SONGS 2 and 3. A description of the Westinghouse process was submitted to the NRC by letter dated September 2, 1983 from Kenneth P. Baskin to H. R. Denton.

Betterment projects do not always have a major direct safety impact and vary in their effect on operation, maintenance, ALARA, reliability, availability, etc. These projects also vary in magnitude from those requiring a small expenditure of resources to those requiring substantial resources and outage time. In many instances, the implementation of a betterment project may be necessary on an expedited schedule due to a anticipated negative impact on plant operation. Due to these and other factors, the betterment projects have their priority and schedule determined by SCE's Plant Modification Review Committee. The Committee is incorporated into the review cycle for approval of plant modifications by San Onofre Procedure SO123-XIX-3.D. This committee consists of SCE representatives from areas of plant operations and management. In this way, special consideration is given to particular attributes of a betterment project that may make it imperative to implement on an expedited schedule.

III. SCHEDULING

Once the projects are ranked they will be evaluated using normal scheduling methods to determine how long they will take to implement. The projects ranked highest will first be evaluated to determine whether they can be implemented during the next scheduled refueling outage. Projects will continue to be selected from the top of the ranked lists and scheduled for the earliest outage in which implementation constraints of a normal refueling outage have not been exceeded. These schedules will then be separated into three lists as described below:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by SCE and which would result in either (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by SCE as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

SCE initiated plant betterment projects.

Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC as described in Section V below.

Schedule C dates are provided for information to allow the NRC to gain perspective on the scope of overall modifications and may be changed at SCE's discretion. Schedules A, B and C together provide the basis for assessing the overall effect of changes to schedules and serve as a departure point for discussion between the NRC and SCE regarding such changes, as discussed below.

IV. SCHEDULE MODIFICATIONS

An important aspect of SCE's planning effort is the recognition that the schedule will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that SCE finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond SCE's control. It is important that the procedure used by SCE for changing the schedules be documented. */ In addition, the NRC must play a role in the oversight of the scheduling process and must, in fact, judge the acceptability of proposed date changes in Schedule A. Accordingly, it is important that the NRC's role, and the interaction between the NRC and SCE be clearly defined, as discussed below.

V. SOUTHERN CALIFORNIA EDISON COMPANY RESPONSIBILITIES

The Integrated Implementation Schedule requires that SCE monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

Southern California Edison will update Schedules A, B and C semi-annually and submit the revised schedules to the NRC beginning six months following NRC approval of the Plan. In addition to updating the schedules, SCE will:

- Summarize progress in implementing NRC requirements concerning plant modifications.
- Identify changes since the last report.
- Summarize the reasons for schedule changes associated with Schedules A and B.

---

*/ Schedules A, B and C will contain sufficient detail to identify those plant capital modifications with completion dates keyed to fuel cycle outages. The schedules may also contain specific dates (either calendar date or keyed to some other milestone) for major evaluations.

- Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling/ modification outage.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications to the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or SCE actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- Determine the priority of the project, or changed priority, using the Westinghouse Analytical Ranking Process.

- Schedule the new or changed item to avoid rescheduling other items already well underway, if it can be reasonably achieved.

- Alter Schedule B and C items before Schedule A items.

- Select a schedule for the new or changed item which will help maintain an optimum integrated program of work.

If a new Schedule A item is added, regardless of the results of the above ranking/scheduling process, the implementation schedule of the new item shall comply with applicable NRC regulations, orders, or license conditions unless a different schedule has been formally established in accordance with appropriate Commission procedures.

As noted above, no changes will be made to Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after SCE has determined that rescheduling of lower priority work either will not significantly assist in maintaining Schedule A without change, or that the safety, cost or schedule penalties from rescheduling lower priority work significantly outweigh the change in a Schedule A completion date.

SCE will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When SCE determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

SCE will notify NRC in writing at least 30 days before adopting a planned delay for an item in Schedule B. Such notification will also include the reasons for the delay and describe any compensatory actions indicated. The revised date proposed by SCE will go into effect

unless NRC, in writing, requests further explanation or discussion concerning such change. If NRC makes such a request, it will be made within 15 days of receipt of SCE'S written notification. In this event, discussions will be initiated to promptly develop a schedule date which is mutually acceptable to SCE and the NRC Project Manager while considering overall program impact. The written notification by NRC will serve to extend the schedule date for the period of time required for such discussions. If a new date is established in these discussions such date will supersede the date set forth in Schedule B. The new date will be incorporated in a revised Schedule B in the next semi-annual schedule update submitted to NRC. If a new date cannot be established in these discussions, SCE changes in scheduled dates will be effective unless subsequently modified by NRC Order.

Work items in Schedule C may be rescheduled or work items may be added to Schedule C by SCE without NRC notification. SCE will report changes to Schedule C items in its semi-annual update to be provided in accordance with Section V.A above. This schedule is provided for information purposes only and is intended to provide the NRC a better understanding of the unit's overall modifications program.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the schedules are inevitable, Actions required by the NRC are discussed below:

A. Southern California Edison Originated Changes

1. Upon receipt from SCE of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to act on the request in accordance with applicable procedures.

2. If the request for a modification of Schedule A is denied, the NRC shall promptly inform SCE and provide the reasons for denial.

3. NRC consideration of SCE changes in non-Schedule A items is covered by V.B above.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with this overall regulatory responsibilities and, unless public health,

safety, or interest require otherwise, will take into account the impact of such action on SCE's ability to complete effectively the items on Schedules A, B and C and, in consultation with SCE, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and SCE recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be submitted to the NRC for review in accordance with established procedures, and, if approved by the Commission, will thereupon be reflected in a revised Schedule A submitted by SCE. SCE will inform the NRC of any resulting changes in Schedule B in accordance with Section V above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. For issues on which the NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussion between SCE and the NRC staff. As for the case of NRC originated changes to Schedule A items, the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by SCE.

VII. MODIFICATIONS TO THE PLAN

The licensees and the NRC recognize that the Plan itself may require future modifications. Accordingly, SCE will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes, if approved, will be made effective upon amendment issuance by the NRC.

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

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 NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 60
License No. NPF-15

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

   A. The application for amendment to the license for San Onofre Nuclear Generating Station, Unit 3 (the facility) filed by Southern California Edison Company (SCE) on behalf of itself and San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (licensees) dated August 28, 1986, and supplemental submittals dated November 21, 1986 and February 1, 1988, 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 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 adding the following paragraph 2.C(27):

   (27) Integrated Implementation Schedule

   The Southern California Edison Company (SCE) shall implement a plan for scheduling all capital modifications based on the attached Integrated Implementation Schedule Program Plan (the "Plan").

   (1) The Plan shall be followed by the licensee beginning with the effective date of this amendment.

   (2) Changes to completion dates for items identified in Schedules B and C of the Plan do not require a license amendment. Dates specified in Schedule A of the Plan shall be changed only in accordance with applicable NRC procedures.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George W. Knighton

George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Integrated Implementation Schedule
Program Plan

Date of Issuance: May 15, 1989

ATTACHMENT

INTEGRATED IMPLEMENTATION SCHEDULE PROGRAM PLAN
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

I. INTRODUCTION

This document provides the methodology to be used in determining the implementation schedules of capital projects at San Onofre Units 2 and 3.

The program has as its goal the implementation of capital modifications in a stable, controlled manner with the implementation of projects with the greatest potential for enhancing the safe operation of the unit generally given highest priority. The projects of regulatory origin will be ranked using the Westinghouse Analytical Ranking Process to specifically determine the relative potential safety contribution of each modification. The safety ranking will then be used as a primary criterion in scheduling the projects. For betterment projects the priority and schedule will be determined by the Plant Modification Review Committee. The Committee consists of management representatives involved in many areas of plant operation and is the most effective means of determining implementation schedules for those projects necessary for continued or improved plant operation, maintenance, etc.

The program reflects limited outage time, financial and manpower resources, while at the same time implementing those modifications deemed necessary for enhanced plant safety. The plan provides for integration of all future identified work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of SCE.

II. SUMMARY OF PRIORITY DETERMINATION

The Integrated Implementation Schedule is based on a priority determination to assist in maximizing the benefit derived from modifications. Since it is not always possible or beneficial to try to implement a large number of modifications in a single outage, the integrated schedule provides a mechanism for focusing attention on those projects of highest priority.

Regulatory related projects will be ranked using the Westinghouse Analytical Ranking Process. This process was approved for San Onofre Unit 1 by the NRC in a letter from D. G. Eisenhut, to K. P. Baskin, SCE, dated November 16, 1983. SCE will use the same methodology for SONGS 2 and 3. A description of the Westinghouse process was submitted to the NRC by letter dated September 2, 1983 from Kenneth P. Baskin to H. R. Denton.

Betterment projects do not always have a major direct safety impact and vary in their effect on operation, maintenance, ALARA, reliability, availability, etc. These projects also vary in magnitude from those requiring a small expenditure of resources to those requiring substantial resources and outage time. In many instances, the implementation of a betterment project may be necessary on an expedited schedule due to a anticipated negative impact on plant operation. Due to these and other factors, the betterment projects have their priority and schedule determined by SCE's Plant Modification Review Committee. The Committee is incorporated into the review cycle for approval of plant modifications by San Onofre Procedure SO123-XIX-3.D. This committee consists of SCE representatives from areas of plant operations and management. In this way, special consideration is given to particular attributes of a betterment project that may make it imperative to implement on an expedited schedule.

III. SCHEDULING

Once the projects are ranked they will be evaluated using normal scheduling methods to determine how long they will take to implement. The projects ranked highest will first be evaluated to determine whether they can be implemented during the next scheduled refueling outage. Projects will continue to be selected from the top of the ranked lists and scheduled for the earliest outage in which implementation constraints of a normal refueling outage have not been exceeded. These schedules will then be separated into three lists as described below:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by SCE and which would result in either (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by SCE as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

SCE initiated plant betterment projects.

Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC as described in Section V below.

Schedule C dates are provided for information to allow the NRC to gain perspective on the scope of overall modifications and may be changed at SCE's discretion. Schedules A, B and C together provide the basis for assessing the overall effect of changes to schedules and serve as a departure point for discussion between the NRC and SCE regarding such changes, as discussed below.

IV. SCHEDULE MODIFICATIONS

An important aspect of SCE's planning effort is the recognition that the schedule will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that SCE finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond SCE's control. It is important that the procedure used by SCE for changing the schedules be documented. */ In addition, the NRC must play a role in the oversight of the scheduling process and must, in fact, judge the acceptability of proposed date changes in Schedule A. Accordingly, it is important that the NRC's role, and the interaction between the NRC and SCE be clearly defined, as discussed below.

V. SOUTHERN CALIFORNIA EDISON COMPANY RESPONSIBILITIES

The Integrated Implementation Schedule requires that SCE monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

Southern California Edison will update Schedules A, B and C semi-annually and submit the revised schedules to the NRC beginning six months following NRC approval of the Plan. In addition to updating the schedules, SCE will:

- Summarize progress in implementing NRC requirements concerning plant modifications.
- Identify changes since the last report.
- Summarize the reasons for schedule changes associated with Schedules A and B.

*/ Schedules A, B and C will contain sufficient detail to identify those plant capital modifications with completion dates keyed to fuel cycle outages. The schedules may also contain specific dates (either calendar date or keyed to some other milestone) for major evaluations.

- Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling/ modification outage.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications to the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or SCE actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- Determine the priority of the project, or changed priority, using the Westinghouse Analytical Ranking Process.

- Schedule the new or changed item to avoid rescheduling other items already well underway, if it can be reasonably achieved.

- Alter Schedule B and C items before Schedule A items.

- Select a schedule for the new or changed item which will help maintain an optimum integrated program of work.

If a new Schedule A item is added, regardless of the results of the above ranking/scheduling process, the implementation schedule of the new item shall comply with applicable NRC regulations, orders, or license conditions unless a different schedule has been formally established in accordance with appropriate Commission procedures.

As noted above, no changes will be made to Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after SCE has determined that rescheduling of lower priority work either will not significantly assist in maintaining Schedule A without change, or that the safety, cost or schedule penalties from rescheduling lower priority work significantly outweigh the change in a Schedule A completion date.

SCE will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When SCE determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

SCE will notify NRC in writing at least 30 days before adopting a planned delay for an item in Schedule B. Such notification will also include the reasons for the delay and describe any compensatory actions indicated. The revised date proposed by SCE will go into effect

unless NRC, in writing, requests further explanation or discussion concerning such change. If NRC makes such a request, it will be made within 15 days of receipt of SCE'S written notification. In this event, discussions will be initiated to promptly develop a schedule date which is mutually acceptable to SCE and the NRC Project Manager while considering overall program impact. The written notification by NRC will serve to extend the schedule date for the period of time required for such discussions. If a new date is established in these discussions such date will supersede the date set forth in Schedule B. The new date will be incorporated in a revised Schedule B in the next semi-annual schedule update submitted to NRC. If a new date cannot be established in these discussions, SCE changes in scheduled dates will be effective unless subsequently modified by NRC Order.

Work items in Schedule C may be rescheduled or work items may be added to Schedule C by SCE without NRC notification. SCE will report changes to Schedule C items in its semi-annual update to be provided in accordance with Section V.A above. This schedule is provided for information purposes only and is intended to provide the NRC a better understanding of the unit's overall modifications program.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the schedules are inevitable, Actions required by the NRC are discussed below:

A. Southern California Edison Originated Changes

1. Upon receipt from SCE of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to act on the request in accordance with applicable procedures.

2. If the request for a modification of Schedule A is denied, the NRC shall promptly inform SCE and provide the reasons for denial.

3. NRC consideration of SCE changes in non-Schedule A items is covered by V.B above.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with this overall regulatory responsibilities and, unless public health,

safety, or interest require otherwise, will take into account the impact of such action on SCE's ability to complete effectively the items on Schedules A, B and C and, in consultation with SCE, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and SCE recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be submitted to the NRC for review in accordance with established procedures, and, if approved by the Commission, will thereupon be reflected in a revised Schedule A submitted by SCE. SCE will inform the NRC of any resulting changes in Schedule B in accordance with Section V above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. For issues on which the NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussion between SCE and the NRC staff. As for the case of NRC originated changes to Schedule A items, the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by SCE.

VII. MODIFICATIONS TO THE PLAN

The licensees and the NRC recognize that the Plan itself may require future modifications. Accordingly, SCE will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes, if approved, will be made effective upon amendment issuance by the NRC.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO.72 TO FACILITY OPERATING LICENSE NO. NPF-10

AND AMENDMENT NO.60 TO FACILITY OPERATING LICENSE NO. NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated August 28, 1986, Southern California Edison Company (SCE), et. al. (the licensees) submitted a request to amend the licenses of the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, to include their Integrated Implementation Schedule for plant capital modifications as a new license condition. The NRC staff review of this proposal resulted in requests for certain revisions, which the licensees provided in letters of November 21, 1986 and February 1, 1988. Further staff review identified additional typographical corrections and language clarification which were discussed with SCE and with which they agreed. The mutually agreed upon Integrated Implementation Schedule Program Plan (The Plan) is provided as an attachment to the licenses, effective with these amendments.

2.0 DESCRIPTION

The proposed license condition will establish the methodology to be used to determine the schedule for implementation of NRC-required plant capital modifications for SONGS Units 2 and 3. The proposed license condition and The Plan are consistent with the recommendations of Generic Letter 83-20, "Integrated Living Schedule for Implementation of Plant Modifications," which was issued by the NRC staff on May 9, 1983.

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Projects are ranked according to their relative potential to enhance safe plant operation. Ranking of projects is performed by two different methodologies. NRC and other regulatory-related modifications are ranked by the Westinghouse Analytical Ranking Process as applied to SONGS Units 2 and 3; the SCE-initiated plant betterment items are ranked by the San Onofre Plant Modification Review Committee. The Westinghouse method was previously evaluated by the NRC and was found to be acceptable by letter dated November 16, 1983 from D. Eisenhut (NRC) to K. Baskin (SCE). The San Onofre Plant Modification Review Committee consists of representatives from many areas of plant operations and management who determine priority and schedules for betterment projects. Thus, special consideration is given to the particular attributes of a project that may make it imperative to implement on an expedited schedule.

Once ranked, the projects are scheduled assuming a normal refueling outage duration. The scheduling also considers lead times, site manpower, engineering support and other resources. Because many of the modifications can only be completed during plant shutdown, completion schedules are usually cycle (or outage) dependent instead of keyed to a fixed calendar date.

The program is structured so that future plant modifications that might be identified can be integrated into the overall program to determine the impact of new requirements on the overall schedule. The plan submitted by the licensees identifies three categories of modifications. Schedule A identifies schedules for modifications established by existing rule, license condition, or order. Schedule B identifies schedules for completion of regulatory items (of either a generic or plant specific nature) identified by NRC or other regulatory agencies and those items perceived by SCE as being prospective NRC requirements, all of which would result in plant modifications. Schedule B also includes major technical evaluation projects to identify any required modifications to satisfy NRC requests. Schedule C consists of SCE-initiated plant betterment projects.

3.0 EVALUATION

The licensees' August 28, 1986 submittal, as revised on November 21, 1986 and February 1, 1988, provides an application for amendments to incorporate a license condition requiring that SCE follow the plan, but permits the licensees to make changes to the plan and its schedules for certain categories of items in accordance with the provisions of the plan. The staff has reviewed the licensees' plan and has made the following determinations:

(a) Changes to schedules for completion of modifications imposed by rule, license condition, or order (Schedule A completion dates) will continue to be sought through the exemption, license amendment, or order-date extension process.

(b) Schedules for completion of other regulatory-related modifications (Schedule B) are identified and provisions are made in the plan to require SCE to provide the NRC with prior written notification of changes to Schedule B completion dates.

(c) Provisions are made in the plan for incorporating new or anticipated regulatory items into either Schedule A or B as these requirements are identified by NRC and/or formalized by rule, license condition, or order.

(d) Schedules for completion of SCE-inititated projects (Schedule C) may be changed at the discretion of SCE.

Semi-annual status reports of utility progress toward implementation of NRC-identified modifications are required by the plan.

The incorporation of a condition into the San Onofre Units 2 and 3 operating licenses which requires SCE to follow the Plan provides an appropriate mechanism to assure that NRC is informed as to whether required safety modifications are performed in a timely manner. At the same time, the plan provides a suitable mechanism for changes to completion dates (due to unforeseen circumstances) for modifications not imposed by rule, license condition or order, and for keeping the NRC informed of such changes. Thus, the Plan provides the degree of flexibility needed to allow effective program implementation as well as assurance that NRC's responsibilities are not compromised.

The Plan and the associated license condition are similar to those approved by the staff in Amendment No. 98 (dated April 20, 1987) to Provisional Operating License No. DPR-13 for San Onofre Unit 1.

3.0 SUMMARY

The proposed change establishes an administrative means for tracking and scheduling NRC required plant modifications and licensee commitments. It does not affect the plant configuration or NRC-mandated schedules for implementation of modifications. Because the proposed license condition does not affect the plant configuration, no accident analyses are affected; therefore, the proposed change is administrative in nature and is, therefore, acceptable.

4.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Chief of the Radiological Health Branch, State Department of Health Services, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments involve changes in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

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

Principal Contributor: D. E. Hickman

Dated: May 15, 1989