September 24, 1985

Docket Nos.: 50-361
50-362

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

Mr. James C. Holcombe
Vice President - Power Supply
San Diego Gas & Electric Company
101 Ash Street
Post Office Box 1831
San Diego, California 92112

Gentlemen:

Subject: Issuance of Amendment No.33 to Facility Operating License NPF-10 and Amendment No.22 to Facility Operating License NPF-15 San Onofre Nuclear Generating Station, Units 2 and 3

The Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 33 to Facility Operating License No. NPF-10 and Amendment No. 22 to Facility Operating License No. NPF-15 for the San Onofre Nuclear Generating Station, Units 2 and 3, located in San Diego County, California. The amendments modify Technical Specification 3/4.7.6, "Snubbers," to make it more closely conform to the model technical specifications provided by NRC Generic Letter 84-13, "Technical Specifications for Snubbers," dated May 3, 1984.

These amendments were requested by your letter of January 23, 1985 and are covered by Proposed Change Number PCN-139.

A copy of the Safety Evaluation supporting the amendments is also enclosed.

Sincerely,

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

Enclosure:
1. Amendment No. 33 to NPF-10
2. Amendment No. 22 to NPF-15
3. Safety Evaluation

cc w/enclosures: See next page

LB#3/DL	LB#3/DL	OELD	LB#3/DL	AD/L/DL
JLee	HRood:dh		GWKnighton	TMNovak
8/19/85	8/23/85	8/ /85	9/19/85	9/ /85

Mr. Kenneth P. Baskin
Southern California Edison Company

San Onofre Nuclear Generating Station
Units 2 and 3

cc:
Mr. James C. Holcombe
Vice President - Power Supply
San Diego Gas & Electric Company
101 Ash Street
Post Office Box 1831
San Diego, California 92112

Charles R. Kocher, Esq.
James A. Beoletto, Esq.
Southern California Edison Company
2244 Walnut Grove Avenue
P. O. Box 800
Rosemead, California 91770

Orrick, Herrington & Sutcliffe
ATTN: David R. Pigott, Esq.
600 Montgomery Street
San Francisco, California 94111

Alan R. Watts, Esq.
Rourke & Woodruff
Suite 1020
1055 North Main Street
Santa Ana, California, 92701

Mr. V. C. Hall
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, Connecticut 06095

Mr. S. McClusky
Bechtel Power Corporation
P. O. Box 60860, Terminal Annex
Los Angeles, California 90060

Mr. C. B. Brinkman
Combustion Engineering, Inc.
7910 Woodmont Avenue
Bethesda, Maryland 20814

Mr. Hans Kaspar, Executive Director
Marine Review Committee, Inc.
531 Encinitas Boulevard, Suite 105
Encinitas, California 92024

Mr. Mark Medford
Southern California Edison Company
2244 Walnut Grove Avenue
P. O. Box 800
Rosemead, California 91770

Dr. L. Bernath
Manager, Nuclear Department
San Diego Gas & Electric Company
P. O. Box 1831
San Diego, California 92112

Richard J. Wharton, Esq.
University of San Diego School of
Law
Environmental Law Clinic
San Diego, California 92110

Charles E. McClung, Jr., Esq.
Attorney at Law
24012 Calle de la Plaza/Suite 330
Laguna Hills, California 92653

Regional Administrator, Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane/Suite 210
Walnut Creek, California 94596

Resident Inspector, San Onofre NPS
c/o U. S. Nuclear Regulatory Commission
Post Office Box 4329
San Clemente, California 92672

Mr. Dennis F. Kirsh
U.S. Nuclear Regulatory Commission - Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

cc:
California State Library
Government Publications Section
Library & Courts Building
Sacramento, CA 95841
ATTN: Ms. Mary Schnell

Mayor, City of San Clemente
San Clemente, CA 92672

Chairman, Board Supervisors
San Diego County
1600 Pacific Highway, Room 335
San Diego, CA 92101

California Department of Health
ATTN: Chief, Environmental
Radiation Control Unit
Radiological Health Section
714 P Street, Room 498
Sacramento, CA 95814

Mr. Joseph O. Ward, Chief
Radiological Health Branch
State Department of Health Services
714 P Street, Building #8
Sacramento, California 95814

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 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 33
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 the Southern California Edison Company on behalf of itself and San Diego Gas and Electric Company, The City of Riverside and the City of Anaheim, California (licensees), dated January 23, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations as set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, 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 set forth in 10 CFR Chapter I;

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

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

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

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 33, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective immediately and is to be fully implemented within 30 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 24, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 33

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Also to be replaced are the following overleaf pages to the amended pages.

Amendment Pages	Overleaf Pages
XXI	-
XXII	-
3/4 7-16	3/4 7-15
3/4 7-17	-
3/4 7-18	-
3/4 7-19	-
3/4 7-20	-
3/4 7-21	-
3/4 7-22	-
3/4 7-23	3/4 7-24
B 3/4 7-5	B 3/4 7-6
6-23	6-24

LIST OF TABLES

LIST OF FIGURES

SURVEILLANCE REQUIREMENTS (Continued)

f. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2050 ± 150 cfm for the ventilation unit and 35,485 cfm ± 10% for the air conditioning unit.

g. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2050 ± 150 cfm for the ventilation unit and 35,485 cfm ± 10% for the air conditioning unit.

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months ± 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

SURVEILLANCE REQUIREMENTS (Continued)

No. Inoperable Snubbers per Inspection Period	Subsequent Visual Inspection Period*#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

*The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

SURVEILLANCE REQUIREMENTS (Continued)

d. Functional Tests

At least once per 18 months during shutdown, a representative sample of at least 10% of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.6.e or 4.7.6.f, an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle

2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine motor, etc.)

3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample.*

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of those snubbers may not be included for the re-sampling.

*Permanent or other exemptions from functional testing for individual snubbers in these caterories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

SURVEILLANCE REQUIREMENTS (Continued)

e. Hydraulic Snubbers Functional Test Acceptance Criteria*

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Mechanical Snubbers Functional Test Acceptance Criteria*

The mechanical snubber functional test shall verify that:

1. The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubber are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers were attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

*Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

SURVEILLANCE REQUIREMENTS (Continued)

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.6.e. or 4.7.6.f. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptace criteria subsequent to their most recent service, and the functional test must have been performed within 12 month before being installed in the unit.

i. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.

j. Refueling Outage Inspections

During each refueling outage an inspection shall be performed of snubbers attached to sections of safety systems piping that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using one of the following: (i) manually induced snubber movement; (ii) evaluation of in-place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel.

THIS PAGE INTENTIONALLY LEFT BLANK

THIS PAGE INTENTIONALLY LEFT BLANK

THIS PAGE INTENTIONALLY LEFT BLANK

3/4.7.7 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.7 Each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material shall be free of greater than or equal to 0.005 microcuries of removable contamination.

APPLICABILITY: At all times.

ACTION:

a. With a sealed source having removable contamination in excess of the above limit, withdraw the sealed source from use and either:

   1. Decontaminate and repair the sealed source, or
   2. Dispose of the sealed source in accordance with Commission Regulations.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.7.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

a. The licensee, or

b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample.

4.7.7.2 Test Frequencies - Each category of sealed sources (excluding startup sources and fission detectors previously subjected to core flux) shall be tested at the frequencies described below.

a. Sources in use - At least once per six months for all sealed sources containing radioactive material:

   1. With a half-life greater than 30 days (excluding Hydrogen 3), and
   2. In any form other than gas.

3/4.7.6 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety related system.

For visual inspection snubbers are categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

SNUBBERS (Continued)

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

3/4.7.7 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e. sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shield mechanism.

3/4.7.8 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met.

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required by the QA Manual.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the OSRC and the NSG.

l. Records of the service lives of all snubbers within the scope of Technical Specification 3/4.7.6 including the date at which the service life commences and associated installation and maintenance records.

m. Records of secondary water sampling and water quality.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Exposure Permit (REP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the REP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following approved plant radiation protection procedures for entry into high radiation areas.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Exposure Permit.

6.12.2 In addition to the requirements of 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved REP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem** that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the REP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.#

6.13.2 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the semi-annual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:

   a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;

   b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and

   c. Documentation of the fact that the change has been reviewed and found acceptable pursuant to 6.5.2.

2. Shall become effective upon review and acceptance pursuant to 6.5.2.

**Measurement made at 18" from source of radioactivity.
#The PCP shall be submitted and approved prior to shipment of "wet" solid radioactive waste.

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 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 22
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 the Southern California Edison Company on behalf of itself and San Diego Gas and Electric Company, The City of Riverside and the City of Anaheim, California (licensees), dated January 23, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations as set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, 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 set forth in 10 CFR Chapter I;

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

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

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

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 22, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective immediately and is to be fully implemented within 30 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 24, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 22

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Also to be replaced are the following overleaf pages to the amended pages.

Amendment Pages	Overleaf Pages
XVII	XVIII
XX	XIX
3/4 7-17	-
3/4 7-18	-
3/4 7-19	-
3/4 7-20	-
3/4 7-21	-
3/4 7-22	-
3/4 7-23	-
3/4 7-24	-
B3/4 7-5	B3/4 7-6
6-24	6-23

INDEX

LIST OF FIGURES

LIST OF TABLES

LIST OF TABLES

LIST OF TABLES

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months ± 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

No. Inoperable Snubbers per Inspection Period	Subsequent Visual Inspection Period*#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

*The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

d. Functional Tests*

At least once per 18 months during shutdown, a representative sample of at least 10% of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber of a type of that does not meet the functional test acceptance criteria of Specification 4.7.6.e or 4.7.6.f, an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine motor, etc.)
3. Snubbers within 10 feet of the discharge from safety relief valve.

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample.*

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

e. Hydraulic Snubbers Functional Test Acceptance Criteria**

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

2. Snubber bleed or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Mechanical Snubbers Functional Test Acceptance Criteria**

The mechanical snubber functional test shall verify that:

1. The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.

2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

**Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

SURVEILLANCE REQUIREMENTS (Continued)

3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers were attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to lock up or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.6.e or 4.7.6.f. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptace criteria subsequent to their most recent service, and the functional test must have been performed within 12 months before being installed in the unit.

SURVEILLANCE REQUIREMENTS (Continued)

i. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.

j. Refueling Outage Inspections

During each refueling outage an inspection shall be performed of snubbers attached to sections of safety systems piping that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using one of the following: (i) manually induced snubber movement; (ii) evaluation of in-place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel.

THIS PAGE INTENTIONALLY LEFT BLANK

THIS PAGE INTENTIONALLY LEFT BLANK

THIS PAGE INTENTIONALLY LEFT BLANK

3/4.7.6 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety related system.

For visual inspection snubbers are categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

SNUBBERS (Continued)

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

3/4.7.7 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e. sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shield mechanism.

3/4.7.8 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met.

6.10.1 The following records shall be retained for at least five years:

a. Records and logs of unit operation covering time interval at each power level.

b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

c. All REPORTABLE OCCURRENCES submitted to the Commission.

d. Records of surveillance activities; inspections and calibrations required by these Technical Specifications.

e. Records of changes made to the procedures required by Specification 6.8.1.

f. Records of radioactive shipments.

g. Records of sealed source and fission detector leak tests and results.

h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

d. Records of gaseous and liquid radioactive material released to the environs.

e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the unit staff.

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required by the QA Manual.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the OSRC and the NSG.

l. Records of the service lives of all snubbers within the scope of Technical Specification 3/4.7.6 including the date at which the service life commences and associated installation and maintenance records.

m. Records of secondary water sampling and water quality.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Exposure Permit (REP)*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the REP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following approved plant radiation protection procedures for entry into high radiation areas.

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

SAFETY EVALUATION

AMENDMENT NO. 33 TO NPF-10

AMENDMENT NO. 22 TO NPF-15

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 & 3

DOCKET NOS. 50-361 AND 50-362

Introduction

Southern California Edison Company (SCE), on behalf of itself and the other licensees, San Diego Gas and Electric Company, the City of Riverside, California, and The City of Anaheim, California, has submitted several applications for license amendments for San Onofre Nuclear Generating Station, Units 2 and 3.

One such request, Proposed Change Number 139, or PCN-139, dated January 23, 1985, involves changes to Technical Specification (T.S.) 3/4.7.6 "Snubbers". Technical Specification 3/4.7.6 requires that snubbers be operable to ensure the integrity of safety related systems and specifies the frequency and type of periodic inspections required to verify snubber operability. The proposed change would revise T.S. 3.7.6 to more closely conform to the model technical specifications provide by NRC Generic Letter 84-13 "Technical Specifications For Snubbers" dated May 3, 1984. Specifically the following changes were proposed:

1. Delete Snubber Listings.
2. Categorize snubbers into accessible and inaccessible groups.
3. Restrict increases in the visual inspection interval.
4. Eliminate refueling outage inspections for systems which have undergone unexpected transients.
5. Revise visual test acceptance criteria to further restrict post inspection operability determinations for hydraulic snubbers.
6. Delete alternate method for functional test sample selection.
7. Differentiate between hydraulic snubber and mechanical snubber functional test acceptance criteria.

The NRC staff has reviewed the proposed changes and has found all the above changes acceptable with the exception of item 4, deletion of inspection of systems which have undergone unexpected transients. Therefore, these amendments incorporate into the tech specs all the proposed changes except item 4. Consequently, the requirement for inspection at each refueling outage of snubbers associated with systems which have undergone unexpected transients will remain in the San Onofre 2 and 3 Technical Specifications.

Evaluation

The staff evaluation of each of the changes proposed by the licensees is given below:

1. Delete Snubber Listings

Previously, T.S. 3.7.6 required that all snubbers listed in Tables 3.7-4a and 3.7-4b be operable. Tables 3.7-4a and 3.7-4b identified specific numbers of snubbers by size and type associated with each safety-related system. The amendments delete these tables and thus no longer identify specific numbers, sizes and types of snubbers. Instead, the amended specification requires all snubbers installed on safety related systems or snubbers whose failure could affect safety related systems to be operable and defines criteria to determine if a snubber is subject to this specification.

The amended tech specs continue to require all snubbers installed on safety related systems to be operable, and do not reduce any existing operability or surveillance requirement. Therefore, the staff finds change to be acceptable.

2. Categorize Snubbers.

This change adds a new provision which allows snubbers to be categorized as either accessible or inaccessible during plant operation for the purpose of scheduling visual inspections. These two groups may be inspected at different times, but are still required to be inspected at the specified interval. This change does not affect the currently specified inspection intervals but allows inspections of accessible and inaccessible snubbers to be scheduled independently.

This change does not reduce any existing requirement, and therefore is acceptable.

3. Restrict Increases in Visual Inspection Interval.

The visual inspection interval is determined by the number of snubbers found inoperable in the previous inspection. For example if 8 snubbers are found inoperable, the next inspection would be required in 31 days. If this inspection uncovered a generic problem which is identified and corrected and the subsequent inspection found no snubbers inoperable then the existing T.S. allow the inspection interval to be increased by one step to 62 days. If the next inspection again found no snubbers inoperable then the inspection interval could be increased by two steps to 6 months. The proposed change will no longer allow two step increases in inspection intervals.

Since the proposed change will allow only one step increases in surveillance intervals, it is an additional restriction. Therefore, this change is acceptable.

4. Eliminate Refueling Outage Inspections.

Currently, in addition to the 100% visual inspection of all snubbers and functional testing of a representative sample of snubbers, the technical specifications require a special refueling outage inspection

of snubbers located on systems identified as having undergone unexpected, potentially damaging transients. The special inspection involves visual inspection of the affected snubbers and verification of freedom of movement (i.e., a partial functional test). The licensees proposed to delete this requirement from the technical specifications.

The NRC staff has reviewed this request and the operating history at San Onofre 2 and 3, and has found that dynamic transients such as water hammers have on several occasions caused snubbers to be inoperable. These inoperable snubbers were found as a result of the inspections of the type required by this technical specification. Because it appears to be performing a useful safety function, the staff has concluded that the requirement for inspection during refueling outages of snubbers that have undergone potentially damaging transients should not be deleted. Therefore, the licensees' request for this change is denied.

5. Revise Visual Test Acceptance Criteria.

Previously, snubbers which appear to be inoperable as result of a visual inspection can be determined to be operable for the purposes of determining the next inspection interval provided that the snubber passes a functional test conducted in the as-found condition. This provision applied to both hydraulic and mechanical snubbers. The amended tech specs will no longer allow this provision for hydraulic snubbers found with uncovered fluid ports. Thus, hydraulic snubbers found in this condition will be considered inoperable.

This change is an additional restriction and is therefore acceptable.

6. Delete Alternate Functional Test Sample Selection Criteria

Sample selection could previously be made by one of two methods. One method simply required functional testing of 10% of each type of snubbers. For each type of snubber where one or more functional test failures occur, an additional 10% must be tested until no more failures are found or all snubbers of that type have been inspected. The alternate method required testing of a representative of each type of snubber with retesting based on probabilistic criteria specified in T.S. Figure 4.7-1. The amendments delete the alternate sampling criteria since it will never be used.

Further, the amendments specify additional conditions on sample selection. The amendments require that 25% of the snubbers in the representative sample be snubbers from the following categories: 1) the first snubber from each reactor vessel nozzle; 2) snubbers within five feet of heavy equipment; or, 3) snubbers within ten feet of the discharge from a safety relief valve.

The amendments are more restrictive in that they eliminate the alternate sampling method and require that the sample include a percentage of snubbers from specific locations. Because this change institutes additional restrictions it is acceptable to the staff.

7. Revise Functional Test Acceptance Criteria

The amendments differentiate between the functional test acceptance criteria for mechanical and hydraulic snubbers. Previously, no differentiation was made. The amendments more accurately define the functional requirements for each type of snubber.

Previously, functional testing required verification that fasteners for attachment of the snubber to the component were secure. Visual inspection also requires verification that snubber attachments are secure. The amendments delete this redundant functional test requirement. Because the proposed change editorially improves clarity and consistency within the technical specifications it is acceptable to the staff.

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 determinations of no significant hazards consideration. No comments were received.

Environmental Consideration

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

Conclusion

Based upon our evaluation of the proposed changes to the San Onofre Units 2 and 3 Technical Specifications, we have concluded that: except for deletion of the refueling outage inspection, there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that except for deletion of the refueling outage inspections, the proposed changes are acceptable, and are hereby incorporated into the San Onofre 2 and 3 Technical Specifications. The proposed deletion of the refueling outage inspection is hereby denied.

Dated: September 24, 1985