

December 27, 2004

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

**SUBJECT: San Onofre Nuclear Generating Station, Units 2 and 3  
Docket Nos. 50-361 and 50-362  
Proposed Change Number (PCN) 557  
Application for Technical Specification Improvement to  
Eliminate Requirements to Provide Monthly Operating Reports  
and Occupational Radiation Exposure Reports**

Gentlemen:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), Southern California Edison (SCE) is submitting a request for an amendment to the Technical Specifications (TS) for the San Onofre Nuclear Generating Station, Units 2 and 3.

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides the revised (clean) TS pages.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated California State Official.

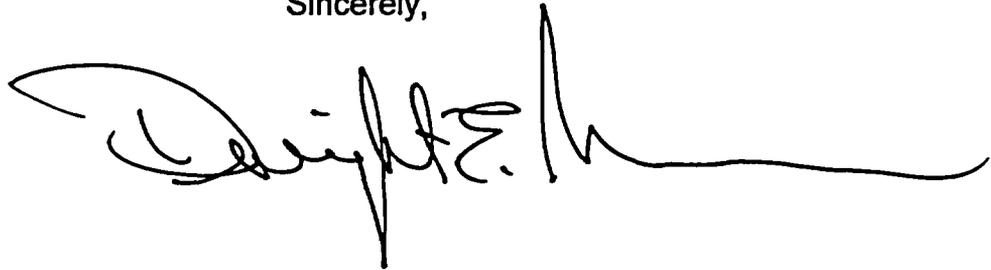
ADD

SCE is herewith making the following regulatory commitments in Attachment 1 "Description and Assessment" (6.1):

1. To provide quarterly operating data to the NRC, and
2. To provide information annually to the NRC to support the apportionment of station dose for SONGS Unit 1 (shutdown) and SONGS Units 2 and 3 (operating).

If you should have any questions regarding this submittal, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to read "Dwight E. H.", with a long horizontal flourish extending to the right.

Attachments: 1. Description and Assessment  
2. Proposed Technical Specification Changes (marked-up)  
3. Revised Technical Specification Pages

cc: B. S. Mallett, Regional Administrator, NRC Region IV,  
B. M. Pham, NRC Project Manager, San Onofre Units 2 and 3  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3  
S. Y. Hsu, Department of Health Sciences, Radiologic Health Branch

**UNITED STATES OF AMERICA**  
**NUCLEAR REGULATORY COMMISSION**

Application of SOUTHERN CALIFORNIA	)	
EDISON COMPANY, ET AL. for a Class 103	)	Docket No. 50-361
License to Acquire, Possess, and Use	)	
A Utilization Facility as Part of	)	Amendment Application No. 230
Unit No. 2 of the San Onofre Nuclear	)	
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, et al. pursuant to 10CFR50.90, hereby submit Amendment Application No. 230. This amendment application consists of Proposed Change Number (PCN) 557 to Facility Operating License NPF-10. PCN-557 is a request to delete the requirements to submit monthly operating reports and occupational radiation exposure reports in Technical Specification (TS) 5.7.1.1a and 5.7.1.4 for San Onofre Nuclear Generating Station Unit 2. The availability of this TS improvement was announced by the Nuclear Regulatory Commission in the *Federal Register* on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIP).

State of California  
County of San Diego

Subscribed and sworn to (or affirmed) before me this 27th day of  
December, 2004

By:   
Dwight E. Nunn  
Vice President

  
Notary Public



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

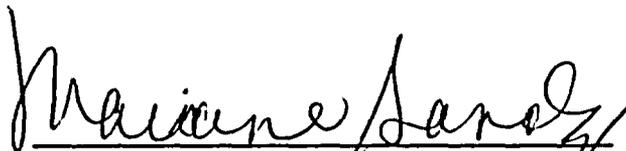
Application of SOUTHERN CALIFORNIA	)	
EDISON COMPANY, ET AL. for a Class 103	)	Docket No. 50-362
License to Acquire, Possess, and Use	)	
A Utilization Facility as Part of	)	Amendment Application No. 214
Unit No. 3 of the San Onofre Nuclear	)	
Generating Station	)	

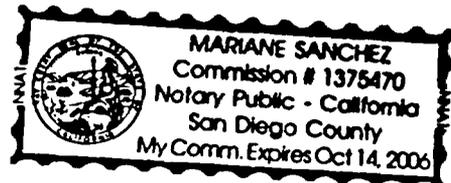
SOUTHERN CALIFORNIA EDISON COMPANY, et al. pursuant to 10CFR50.90, hereby submit Amendment Application No. 214. This amendment application consists of Proposed Change Number (PCN) 557 to Facility Operating License NPF-15. PCN-557 is a request to delete the requirements to submit monthly operating reports and occupational radiation exposure reports in Technical Specification (TS) 5.7.1.1a and 5.7.1.4 for San Onofre Nuclear Generating Station Unit 3. The availability of this TS improvement was announced by the Nuclear Regulatory Commission in the *Federal Register* on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIP).

State of California  
County of San Diego

Subscribed and sworn to (or affirmed) before me this 27<sup>th</sup> day of  
December, 2004

By:   
Dwight E. Nunn  
Vice President

  
Notary Public



**ATTACHMENT 1**  
**Description and Assessment**

**1.0 INTRODUCTION**

The proposed License amendment deletes the requirements in Technical Specification (TS) 5.7.1.1a for an annual report on occupational radiation exposures and TS 5.7.1.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIP).

**2.0 DESCRIPTION OF PROPOSED AMENDMENT**

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 5.7.1.1a	Occupational Radiation Exposure Report	Deleted
TS 5.7.1.4	Monthly Operating Reports	Deleted

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, Southern California Edison (SCE) is proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls." Specifically, TS 5.7.1.4 includes a requirement to include in the monthly operating reports any challenges to pressurizer safety valves. The NRC model safety evaluation addressed the removal of requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief and safety valves (i.e., if a licensee had not yet adopted the associated part of TSTF-258). The proposed change is consistent with the option described in the Notice of Availability published on June 23, 2004 (69 FR 35067) and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

This application involves a site with both operating and shutdown reactors. As addressed in the Notice of Availability for TSTF-369, Southern California Edison (SCE) has included in this application a regulatory commitment to support the NRC need to apportion doses reported under 10 CFR Part 20 to the different categories of reactors at the site.

### **3.0 BACKGROUND**

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **4.0 REGULATORY REQUIREMENTS AND GUIDANCE**

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published June 23, 2004 (69 FR 35067) and TSTF-369.

### **5.0 TECHNICAL ANALYSIS**

Southern California Edison (SCE) has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067), as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. SCE has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3), and justify this amendment for the incorporation of the changes to the SONGS 2 and 3 TS.

### **6.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

#### **6.1 Verification and Commitments**

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, SCE is making the following verifications and regulatory commitments:

1. SCE is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).

2. SONGS has both operating and shutdown units.

SCE is making a regulatory commitment to provide information to the NRC annually (e.g., with the annual submittal in accordance with 10 CFR 20.2206) to support the apportionment of station dose for SONGS Unit 1 (shutdown) and SONGS Units 2 and 3 (operating). The data will provide the summary distribution of annual whole body doses as presented in Appendix B of NUREG-0713 for operating and shutdown units.

## **7.0 NO SIGNIFICANT HAZARDS CONSIDERATION**

Southern California Edison (SCE) has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIP. SCE has concluded that the proposed determination presented in the notice is applicable to San Onofre Nuclear Generating Station Units 2 and 3, and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## **8.0 ENVIRONMENTAL EVALUATION**

Southern California Edison (SCE) has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIP. SCE has concluded that the staff's findings presented in that evaluation are applicable to San Onofre Nuclear Generating Station Units 2 and 3, and the evaluation is hereby incorporated by reference for this application.

## **9.0 PRECEDENT**

This application is being made in accordance with the CLIP. Southern California Edison (SCE) is not proposing variations or deviations from the TS changes described in TSTF-369 and the limited portion of TSTF-258 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

## **10.0 REFERENCES**

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement To Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067)

**ATTACHMENT 2**

**Proposed Technical Specification Changes  
Units 2 and 3 (Mark-Up)**

5.0 ADMINISTRATIVE CONTROLS

5.7 Reporting Requirements

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5.7.1 Routine Reports

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4. The reports shall be addressed to the U.S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C., with a copy to the Regional Administrator of the Regional Office of the NRC, unless otherwise noted.

5.7.1.1 Annual Reports

-----NOTE-----  
A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.  
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Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted by March 31 of each year.

Reports required on an annual basis include:

- a. ~~Occupational Radiation Exposure Report~~ (Deleted)

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.407. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total whole-body dose received from external sources should be assigned to specific major work functions; and~~

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5.7 Reporting Requirements (continued)

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5.7.1.4 ~~Monthly Operating Reports (Deleted)~~

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to pressurizer safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C., with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.~~

5.7.1.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. Specification 3.1.4, "Moderator Temperature Coefficient;"
2. Specification 3.1.5, Control Element Assembly (CEA) Alignment;"
3. Specification 3.1.7, "Regulating CEA Insertion Limits;"
4. Specification 3.1.8, "Part Length Control Element Assembly Insertion Limits;"
5. Specification 3.2.1, "Linear Heat Rate;"
6. Specification 3.2.4, "Departure From Nucleate Boiling Ratio;"
7. Specification 3.2.5, "Axial Shape Index;"
8. Specification 3.9.1, "Boron Concentration."

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

- 1.a.1 Letter, dated September 5, 1985, M. O. Medford (SCE) to G. W. Knighton (NRC), "Docket No. 50-361 and 50-362 Reload Analysis Report," San Onofre Nuclear Generating Station Units 2 and 3 (Cycle 3)

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5.0 ADMINISTRATIVE CONTROLS

5.7 Reporting Requirements

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5.7.1 Routine Reports

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4. The reports shall be addressed to the U.S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C., with a copy to the Regional Administrator of the Regional Office of the NRC, unless otherwise noted.

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~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.407. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total whole-body dose received from external sources should be assigned to specific major work functions, and~~

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5.7 Reporting Requirements (continued)

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5.7.1.4 ~~Monthly Operating Reports (Deleted)~~

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to pressurizer safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C., with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.~~

5.7.1.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Specification 3.1.4, "Moderator Temperature Coefficient;"
  2. Specification 3.1.5, Control Element Assembly (CEA) Alignment;"
  3. Specification 3.1.7, "Regulating CEA Insertion Limits;"
  4. Specification 3.1.8, "Part Length Control Element Assembly Insertion Limits;"
  5. Specification 3.2.1, "Linear Heat Rate;"
  6. Specification 3.2.4, "Departure From Nucleate Boiling Ratio;"
  7. Specification 3.2.5, "Axial Shape Index;"
  8. Specification 3.9.1, "Boron Concentration."
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
- 1.a.1 Letter, dated September 5, 1985, M. O. Medford (SCE) to G. W. Knighton (NRC), "Docket No. 50-361 and 50-362 Reload Analysis Report," San Onofre Nuclear Generating Station Units 2 and 3 (Cycle 3)

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**ATTACHMENT 3**

**Revised Technical Specification Changes  
Units 2 and 3**

5.0 ADMINISTRATIVE CONTROLS

5.7 Reporting Requirements

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5.7.1 Routine Reports

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4. The reports shall be addressed to the U.S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C., with a copy to the Regional Administrator of the Regional Office of the NRC, unless otherwise noted.

5.7.1.1 Annual Reports

-----NOTE-----  
A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.  
-----

Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted by March 31 of each year.

Reports required on an annual basis include:

- a. (Deleted)

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5.7 Reporting Requirements (continued)

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5.7.1.4 (Deleted)

5.7.1.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
  1. Specification 3.1.4, "Moderator Temperature Coefficient;"
  2. Specification 3.1.5, Control Element Assembly (CEA) Alignment;"
  3. Specification 3.1.7, "Regulating CEA Insertion Limits;"
  4. Specification 3.1.8, "Part Length Control Element Assembly Insertion Limits;"
  5. Specification 3.2.1, "Linear Heat Rate;"
  6. Specification 3.2.4, "Departure From Nucleate Boiling Ratio;"
  7. Specification 3.2.5, "Axial Shape Index;"
  8. Specification 3.9.1, "Boron Concentration."
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
  - 1.a.1 Letter, dated September 5, 1985, M. O. Medford (SCE) to G. W. Knighton (NRC), "Docket No. 50-361 and 50-362 Reload Analysis Report," San Onofre Nuclear Generating Station Units 2 and 3 (Cycle 3)

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5.0 ADMINISTRATIVE CONTROLS

5.7 Reporting Requirements

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5.7.1.1 Annual Reports

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-----

Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted by March 31 of each year.

Reports required on an annual basis include:

- a. (Deleted)

(continued)

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5.7 Reporting Requirements (continued)

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5.7.1.4 (Deleted)

5.7.1.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
  - 1. Specification 3.1.4, "Moderator Temperature Coefficient;"
  - 2. Specification 3.1.5, Control Element Assembly (CEA) Alignment;"
  - 3. Specification 3.1.7, "Regulating CEA Insertion Limits;"
  - 4. Specification 3.1.8, "Part Length Control Element Assembly Insertion Limits;"
  - 5. Specification 3.2.1, "Linear Heat Rate;"
  - 6. Specification 3.2.4, "Departure From Nucleate Boiling Ratio;"
  - 7. Specification 3.2.5, "Axial Shape Index;"
  - 8. Specification 3.9.1, "Boron Concentration."
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:
  - 1.a.1 Letter, dated September 5, 1985, M. O. Medford (SCE) to G. W. Knighton (NRC), "Docket No. 50-361 and 50-362 Reload Analysis Report," San Onofre Nuclear Generating Station Units 2 and 3 (Cycle 3)

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