July 19, 2005

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

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 - ISSUANCE OF AMENDMENTS ON MISCELLANEOUS TECHNICAL SPECIFICATIONS (TAC NOS. MC3800 AND M3801)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No.197 to Facility Operating License No. NPF-10 and Amendment No. 188 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated June 29, 2004, as supplemented by letter dated June 14, 2005.

The proposed changes revise the TSs to implement the following miscellaneous TS changes:

- Revise TS 2.2.5 Safety Limit Violations Licensee Event Report reporting period from 30 days to 60 days.

- Revise TS 5.5.2.11 Steam Generator Tube Surveillance requirements to correct typographical errors.

- Revise SR 3.4.3.1.2 Pressurizer Heatup and Cooldown Limits Surveillance Requirements frequency to reflect pressurizer spray cyclic limits governed by the temperature differentials between the spray nozzle and the spray line.

- Remove TS 5.5.2.14 Configuration Risk Management Program in accordance with *Federal Register* Notice Vol. 64, No. 137 (64 FR 38551, July 19, 1999).

- Revise TS 5.7.1.5 Core Operating Limits Report (COLR) to delete revision numbers and dates from the referenced documents in this section, consistent with the NRC approved industry Technical Specifications Task Force (TSTF) Standard Technical Specifications Traveler number TSTF-363, "Revise Topical Report References in ITS (Improved Technical Specifications) 5.6.5 COLR."

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

Sincerely,

/RA/
Bo M. Pham, Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures:
1. Amendment No. 197 to NPF-10
2. Amendment No. 188 to NPF-15
3. Safety Evaluation

cc w/encls: See next page

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

Sincerely,
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Bo M. Pham, Project Manager, Section 2
Project Directorate IV
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cc w/encls: See next page

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ACCESSION NO: **ML052020208** NRR-058 *No legal objection

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SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.197
License No. NPF-10

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

   A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated June 29, 2004, as supplemented by letter dated June 14, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

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

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

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

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No.197, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/
Daniel S. Collins, Acting Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: July 19, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 197

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
v	v
2.0-1	2.0-1
3.4-14	3.4-14
5.0-17	5.0-17
5.0-20	5.0-20
5.0-20a	5.0-20a
5.0-26	5.0-26
5.0-27	5.0-27
5.0-28	5.0-28
5.0-29	5.0-29
5.0-30	5.0-30
5.0-31	5.0-31
5.0-32	- - - - - -
5.0-33	- - - - - -

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. 188
License No. NPF-15

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

   A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated June 29, 2004, as supplemented by letter dated June 14, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

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

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

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

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 188, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/
Daniel S. Collins, Acting Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: July 19, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. _____

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
v	v
2.0-1	2.0-1
3.4-14	3.4-14
5.0-17	5.0-17
5.0-20	5.0-20
5.0-20a	5.0-20a
5.0-26	5.0-26
5.0-27	5.0-27
5.0-28	5.0-28
5.0-29	5.0-29
5.0-30	5.0-30
5.0-31	5.0-31
5.0-32	- - - - - -
5.0-33	- - - - - -

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO.197 TO FACILITY OPERATING LICENSE NO. NPF-10

AND AMENDMENT NO. 188 TO FACILITY OPERATING LICENSE NO. NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By application dated June 29, 2004, (Agencywide Documents and Access Management System (ADAMS) Accession No. ML041880211), as supplemented by letter dated June 14, 2005 (ADAMS Accession No. ML051680305), Southern California Edison Company (SCE or the licensee), requested changes to the Technical Specifications (TSs) for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The proposed changes would implement the following TS changes:

- Revise TS 2.2.5 Safety Limit Violations Licensee Event Report (LER) reporting period from 30 days to 60 days.

- Revise TS 5.5.2.11 Steam Generator (SG) Tube Surveillance requirements to correct typographical errors.

- Revise SR 3.4.3.1.2 Pressurizer Heatup and Cooldown Limits Surveillance Requirements frequency to reflect pressurizer spray cyclic limits governed by the temperature differentials between the spray nozzle and the spray line.

- Remove TS 5.5.2.14 Configuration Risk Management Program (CRMP) in accordance with *Federal Register* Notice Vol. 64, No. 137 (64 FR 38551, July 19, 1999).

- Revise TS 5.7.1.5 Core Operating Limits Report (COLR) to delete revision numbers and dates from the referenced documents in this section, consistent with the NRC approved industry Technical Specifications Task Force (TSTF) Standard Technical Specifications Traveler number TSTF-363, "Revise Topical Report References in ITS (Improved Technical Specifications) 5.6.5 COLR."

2.0 REGULATORY EVALUATION

The licensee has identified applicable regulatory requirements in Section 5 of its June 29, 2004, submittal. The NRC staff based its acceptance criteria from the following regulatory requirements:

- Part 50.73(a)(1) of *Title 10 of the Code of Federal Regulations* (10 CFR) states that the holder of an operating license for a nuclear power plant (licensee) shall submit a LER for any event of the type described in 10 CFR 50.73(a) within 60 days after the discovery of the event.

- 10 CFR 50.36 specifies regulatory requirements for the contents of licensees' TSs.

- 10 CFR 50.55a(c)(1) dictates that components which are part of the reactor coolant pressure boundary must meet the requirements for Class 1 components in Section III of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code).

- 10 CFR 50.65 requires licensees to assess the effect of equipment maintenance on the plant's capability to perform safety functions before beginning maintenance activities on structures, systems, and components.

- 10 CFR 50.59 provides the requirements for controlling modification (addition or removal from), the facility or procedures that affects a design function, method of performing or controlling the function, or an evaluation that demonstrates that intended functions will be accomplished.

3.0 TECHNICAL EVALUATION

3.1 TS 2.2.5 Safety Limit Violations Licensee Event Report (LER)

The licensee's current 30-day LER requirement in TS 2.2.5 is based on the previous 10 CFR 50.73(a)(1) requirement, which has been updated to reflect a 60-day LER requirement. The licensee's request to revise TS 2.2.5 is consistent with the current requirement of 10 CFR 50.73(a)(1) and is therefore acceptable.

3.2 TS 5.5.2.11 Steam Generator Tube Surveillance Program

The licensee's request to correct typographical errors in TS 5.5.2.11.f.1.a to change the wording from "Degradation - A servicer-induced cracking . . . on either inside or outside of a tube" to "Degradation - A servicer-induced cracking . . . on either the inside or outside of a tube," and in TS 5.5.2.11.f.1.b from "Degraded tube - A tube containing imperfections . . . cause by degradation" to "Degraded tube - A tube containing imperfections . . . caused by degradation," does not change the definition of Degradation in the requirements of TS 5.5.2.11.f.1, and is therefore an acceptable change without any impact to meeting regulatory requirements.

3.3 SR 3.4.3.1.2 Pressurizer Heatup and Cooldown Limits Surveillance Requirements (SRs)

This proposed change replaces the existing SR 3.4.3.1.2 frequency requirement, "When less than 4 reactor coolant pumps are operating and for each cycle of auxiliary spray operation," with, "For each cycle of auxiliary spray operation and for each cycle of main spray operation when the RCS [reactor coolant system] cold leg temperature is < 500 EF." This change would reflect that temperature differentials between the spray nozzle and the spray line govern the

pressurizer spray cyclic limits and is consistent with analyses in the Updated Final Safety Analysis Report (UFSAR) Section 3.9.1.1.

The SONGS UFSAR Section 3.9.1.1, Design Transients, identifies transients used in the design and fatigue analysis of ASME Code Class 1 components, and provides the basis for SR 3.4.3.1.2. In support of the design of each Code Class 1 component, a fatigue analysis of the combined effects of mechanical and thermal loads is performed in accordance with the requirements of Section III of the ASME Code. Table 3.9-1 summarizes the transients to be used in stress analysis of Code Class 1 components, where the Difference Between Pressurizer and Pressurizer Spray During Pressurizer Spray Cycle requires that, if the maximum temperature difference between the pressurizer and main or auxiliary spray is greater than 200 EF, the cumulative usage factor must be calculated to evaluate if the spray system remains acceptable for additional service or if subsequent spray operation shall be restricted.

The current SR 3.4.3.1.2 only applies when less than 4 reactor coolant pumps (RCPs) are operating. A maximum temperature differential of 200 EF is assumed for normal spray operations, and of particular concern is the potential for flow stratification in the pressurizer spray line during operations involving fewer than 4 RCPs. The licensee's updated analysis, however, indicate that the temperature difference between the pressurizer and the spray water could still potentially be greater than 200 EF, even with all 4 RCPs operating, if main spray is actuated with RCS cold leg temperature below 500 EF. The licensee's basis for the 500 EF limit follows.

During plant startup, main spray is implemented entering Mode 4 after the second RCP starts, and continues throughout Mode 3. In Mode 3, the pressurizer temperature is maintained at 650 EF, and the 4th RCP can be started when the RCS cold leg temperature is greater than 400 EF. With all 4 RCPs running, their driving head is enough to provide sufficient bypass flow to keep the spray line warm. However, the temperature difference between the 650 EF pressurizer and spray water could still equal or exceed 200 EF if main spray is actuated prior to RCS cold leg temperature reaching 500 EF, i.e., if a conservative 50 EF estimate for heat loss from spray line flow traveling from the RCS cold leg to pressurizer is factored in, the temperature difference between the pressurizer at 650 EF and the RCS cold leg at 500 EF (650 EF - 500 EF + 50 EF heat loss = 200 EF) is still 200 EF. According to the licensee, only once RCS cold leg temperature is greater than 500 EF is there assurance that the temperature difference between the pressurizer and spray water will be less than 200 EF and the number of spray cycles unlimited. The licensee, therefore, concludes that when RCS cold leg temperature is greater than 500 EF, there is no longer a need to apply SR 3.4.3.1.2. Additionally, the licensee states that the revised SR 3.4.3.1.2 FREQUENCY requirement is more conservative than the previous one and will result in surveillances which are focused on the temperature differential requirements.

Based on the reasoning stated above, the NRC staff finds the licensee's proposed change to a 500 EF limit more conservative than its previous assumption of operation with less than 4 RCPs, and is therefore acceptable per 10 CFR 50.55a(c)(1) and the requirements for Class 1 components in Section III of the ASME Code.

3.4 TS 5.5.2.14 Configuration Risk Management Program

The licensee proposes to delete TS 5.5.2.14 entirely, and with it the associated Bases sections (Attachment G of the licensee's June 29, 2004, submittal). The licensee cites *Federal Register*

Notice Vol. 64, No. 137, dated July 19, 1999 (64 FR 38551), Section II.5 "Regulatory Controls Overlapping Technical Specifications" as its justification that the final Maintenance Rule provides requirements which duplicate the CRMP requirements of the TSs. In section II.5 of the July 19, 1999, notice, the NRC staff agreed that some overlap exists among the regulatory controls outlined in the revised 10 CFR 50.65 rule and TSs, i.e., under certain conditions, a plant's TS may allow structures, systems, and components (SSC) to be out of service, while a pre-maintenance assessment proposing the removal of that same SSC from service may indicate a need to take other actions to preclude that configuration. This may possibly lead to allowed outage times of the TS not being in complete agreement with reasonable out-of-service times resulting from the required assessments. However, the NRC staff stated that TS limiting conditions for operation were, in part, developed to address random single failures of plant SSCs; not to be used by licensees as rationale for removing multiple SSC from service to perform on-line maintenance. To prevent this overlap between TSs and the revised 10 CFR 50.65 maintenance rule, the Commission's SECY-98-067 addressed the need for the NRC staff to take actions to ensure that CRMP regulatory guidance conforms to the provisions of the final maintenance rule. The NRC staff also stated in its July 19, 1999, notice that it would expeditiously support licensee requests to remove the CRMP requirements from plant TSs.

Based on the rationale of the revision to the final maintenance rule 10 CFR 50.65 described above, the NRC staff finds the licensee's request to eliminate TS 5.5.2.14 for the CRMP acceptable.

3.5 TS 5.7.1.5 Core Operating Limits Report

In its June 29, 2004, submittal, the licensee cites TSTF-363, "Revise Topical Report References in ITS (Improved Technical Specifications) 5.6.5 COLR," as its justification to propose elimination of revision numbers, supplements, dates, and associated correspondence references from the list of approved topical reports cited in the TS that contain analytical methods used in determining core operating limits. For documents other than topical reports (e.g., licensing submittals) currently referenced in the TSs, the licensee proposes to only cite NRC approval letters, which already includes both NRC safety evaluations and listings of documents submitted in support of each analytical method.

The licensee states in its June 29, 2004, submittal that the implementation of these proposed changes will have no adverse impact on SCE's practices for controlling methodologies used in developing the core operating limits for SONGS, Units 2 and 3, and that no actual changes to current analytical methods will result from these changes.

In accordance with TSTF-363, the licensee also indicates that it would provide, in its COLR, the complete citations (i.e., report number, title, revision number, report date, or NRC Safety Evaluation Report (SER) date, and any supplements) for each topical report listed in TS 5.7.1.5, and that changes to the COLR would be controlled under 10 CFR 50.59.

In a letter to Mr. James F. Mallay (Siemens Power Corporation) dated December 15, 1999 (ADAMS Accession No. ML993540351), the NRC staff stated that it was acceptable for references to topical reports in ITS Section 5.6.5 COLR, to give the topical report title and number as long as the complete citation is given in the COLR.

In its evaluation of TSTF-363, the NRC staff further acknowledges that this method of referencing topical reports would allow licensees to use current topical reports to support limits in the COLR without having to submit amendments to facility operating licenses every time a topical report is revised, and that the COLR would provide specific information identifying the particular approved topical reports used to determine the core limits for each particular cycle.

NUREG-1432, Revision 3, "Standard Technical Specifications Combustion Engineering Plants" currently states the following for TS 5.6.5 COLR:

> b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
>
> Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).

The NRC staff deems SCE's request to revise TS 5.7.1.5 consistent with the guidance contained in NUREG-1432 above. Additionally, the proposed changes will not have any impact on the NRC's approval process for licensing topical reports, which controls approved analytical methods used in determining licensees' core operating limits, and therefore, an adequate change control process for changing the COLR at SONGS, Units 2 and 3 exists. Based on this reasoning, the NRC staff deems that adequate safety is maintained, and finds the licensee's request for changes to TS 5.7.1.5 acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendment. The State official had no comments

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes a surveillance requirement. The NRC staff has determined that the amendment involves 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding published August 3, 2004 (69 FR 46588). The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

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

Principal Contributor: B. Pham

Date: July 19, 2005

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San Onofre Nuclear Generating Station
Units 2 and 3

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