

February 9, 2006

Mr. Richard M. Rosenblum
Chief Nuclear Officer
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 -
REQUEST FOR ADDITIONAL INFORMATION REGARDING AMENDMENT TO
TECHNICAL SPECIFICATIONS, BATTERY AND DC SOURCES (TAC NOS.
MC5447 AND MC5448)

Dear Mr. Rosenblum:

On December 17, 2004, Southern California Edison (the licensee) submitted an amendment request (Agencywide Documents Access and Management System Accession Number ML043570322) proposing to revise the Operating License by modifying the Technical Specification (TS) requirements for battery and direct current (DC) sources and cross-tie through revision of TSs 3.8.1, "AC [alternating current] Sources – Operating," 3.8.4, "DC Sources – Operating," 3.8.5, "DC Sources – Shutdown," 3.8.6, "Battery Cell Parameters," 3.8.7, "Inverters – Operating," 3.8.9, "Distribution Systems – Operating," and adding a new Battery Monitoring and Maintenance Program, Section 5.5.2.16.

After reviewing your request, the Nuclear Regulatory Commission staff has determined that additional information is required to complete the review. We discussed this information with your staff by telephone and they agreed to provide the additional information requested in the enclosure within 30 days of receipt of this letter.

If you have any questions, please me at (301) 415-1480.

Sincerely,

/RA/

N. Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure: Request for Additional Information

cc w/encl: See next page

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N. Kalyanam, Project Manager
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Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure: Request for Additional Information

cc w/encl: See next page

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ACCESSION NO: ML060410112

* No major change from Staff provided RAI

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DE/EEEE*	NRR/LPL4/BC
NAME	NKalyanam	LFeizollahi	RJenkins	DTerao
DATE	01/12/06	01/12/06	12-21-2005	02/09/06

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REQUEST FOR ADDITIONAL INFORMATION

SOUTHERN CALIFORNIA EDISON COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 and 50-362

1. After a battery is declared inoperable per Limiting Condition of Operation (LCO) 3.8.4, Condition B, please describe how you get to Required Actions E1 and E2, or otherwise confirm that the affected unit would be in Technical Specification (TS) 3.0.3.
2. Please explain why the Bases for LCO 3.8.5 does not explain the reasons for the cross-connection action cited in TS 3.8.5 (i.e., that an immediate direct current (DC) subsystem cross-connection can be made given an inoperable charger). Explain why in LCO 3.8.4, this option is not called out as a required action, nor is it permissible unless the problem with the DC subsystem does not involve the charger, as prescribed in Condition C of LCO 3.8.4.
3. LCO 3.8.5, Condition C, provides a choice between Required Actions C.1 or C.2.1 through C.2.4. Please explain when the latter choice C.2 would become mandatory. Your response should consider LCO 3.8.10 and its required actions.
4. Regarding LCO 3.8.5, Required Action A.1.2, please describe how the proposed TSs would limit cross-connecting two subsystems with the two batteries remaining connected to their respective buses (Note that pages 23, 27, and 28 of the submittal discuss, within the context of LCO 3.8.4, the importance of minimizing the time that two DC subsystem batteries are in parallel due to the consequences should an electrical fault occur while in this configuration.).
5. Regarding Surveillance Requirement 3.8.6.1, what actions are required if pilot cell specific gravity is less than 1.200, but greater than or equal to 1.195, and identify what is the source of these required actions.
6. Table 1 (found on page 10 of Attachment J); license controlled specification refers to LCS 3.8.104.1, 3.8.104.2, and LCS 3.8.106.1-6. (It should be noted that the incorrect reference to Table 1 is found on page 10 of the submittal). Please explain why the proposed licensee controlled specifications were not provided in the submittal.
7. Please clarify Table 1. The table identifies that the alarm and set-point data (referenced in IEEE 450-2002, Section 5.2.1, paragraphs G and J (noted in the above Table 1 to have no proposed specifications)).
8. Regarding TS 5.25.2.16b, please confirm that the minimum established design limit refers to the minimum level mark on the cell jar and not the top of the plate.
9. Given that B 3.8-68 of the Bases indicates that if the electrolyte level is discovered to be below the top of the plates, the battery must be equalized and tested to confirm

operability, it appears that LCO 3.8.6, Condition C, should have one more required action (C.4) which would mandate this equalizing and testing. Please justify not having this required action (Note: The notes preceding Required Action C.1 may need to be modified to include this Required Action C.4.).

San Onofre Nuclear Generating Station
Units 2 and 3

cc:

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November 2005