

April 17, 2006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: **Docket Nos. 50-361 and 50-362
Proposed Change Number NPF-10/15-568
Application to Eliminate License Condition 2.G, Requiring Reporting
of Violations of Section 2.C of Operating Licenses
San Onofre Nuclear Generating Station, Units 2 and 3**

Dear Sir or Madam:

In accordance with the provisions of 10 CFR 50.90, Southern California Edison (SCE) is submitting a request for an amendment to the operating licenses for San Onofre Nuclear Generating Station, Units 2 and 3.

The proposed amendments would delete License Condition 2.G that requires reporting of violations of the requirements listed in Sections 2.C(1), 2.C(3), and 2.F, of the operating licenses. The change is consistent with the notice published in the *Federal Register* on November 4, 2005 (70 FR 67202) as part of the consolidated line item improvement process (CLIP).

Enclosures 1 and 2 provide notarized affidavits required by 10 CFR 50.30.

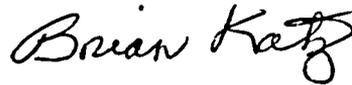
Enclosure 3 provides a description of the proposed change and confirmation of applicability. Attachments A through F provide the existing licensing pages and the proposed changes.

SCE will implement the amendments within 60 days from the date of issuance by the Nuclear Regulatory Commission.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated California state official.

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

Sincerely,



Enclosures: 1. Notarized affidavit, Unit 2
 2. Notarized affidavit, Unit 3
 3. Description and No Significant Hazards Analysis

Attachments: A. Existing Pages, SONGS Unit 2
 B. Existing Pages, SONGS Unit 3
 C. Proposed Pages (Redline and Strikeout), SONGS Unit 2
 D. Proposed Pages (Redline and Strikeout), SONGS Unit 3
 E. Proposed Pages, SONGS Unit 2
 F. Proposed Pages, SONGS Unit 3

cc: B. S. Mallett, Regional Administrator, NRC Region IV
 N. Kalyanam, 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, California Department of Health Services, 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
Unit No. 2 of the San Onofre Nuclear) No. 242
Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 242. This amendment application consists of Proposed Change No. NPF-10-568 to Facility Operating License NPF-10. Proposed Change No. NPF-10-568 is a request to revise Facility Operating License NPF-10 to incorporate a consolidated line item improvement process (CLIP) which eliminates a License Condition requiring reporting of violations.

State of California
County of San Diego

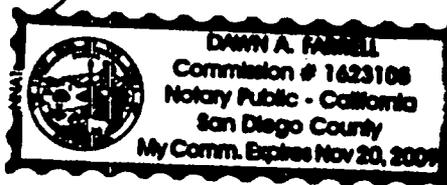
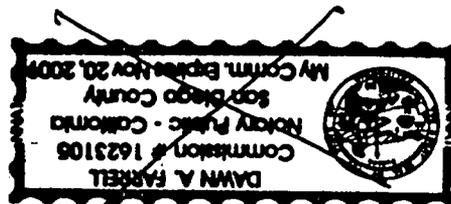
Brian Katz
Brian Katz, Vice President

Subscribed and sworn to (~~or affirmed~~) before me on this 17th day of April, 2006,

by Brian Katz

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Dawn A. Farrell
Notary Public



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-362
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 3 of the San Onofre Nuclear)	No. 226
Generating Station)		

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 226. This amendment application consists of Proposed Change No. NPF-15-568 to Facility Operating License NPF-15. Proposed Change No. NPF-15-568 is a request to revise Facility Operating License NPF-15 to incorporate a consolidated line item improvement process (CLIP) which eliminates a License Condition requiring reporting of violations.

State of California
County of San Diego

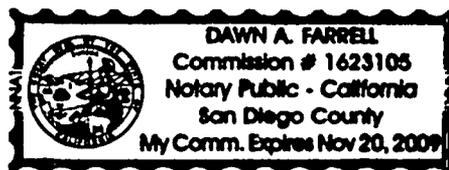
Brian Katz
Brian Katz, Vice President

Subscribed and sworn to (~~or affirmed~~) before me on this 17th day of April, 2006.

by Brian Katz,

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Dawn A. Farrell
Notary Public



ENCLOSURE 3

**Description and No Significant Hazards Analysis
For Proposed Change NPF-10/15-568
San Onofre Nuclear Generating Station
Units 2 and 3**

**Description and No Significant Hazards Analysis
For Proposed Change NPF-10/15-568
San Onofre Nuclear Generating Station
Units 2 and 3**

1.0 INTRODUCTION

The proposed amendment would delete License Condition 2.G of Facility Operating License Nos. NPF-10/15 for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, which requires reporting of violations of the requirements in Sections 2.C and 2.F of the facility operating license. The availability of this operating license improvement was announced in the *Federal Register* on November 4, 2005 (70 FR 67202) as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the CLIIP Notice of Availability (70 FR 67202), the proposed amendment consists of deleting License Condition 2.G of Facility Operating License Nos. NPF-10/15. The current requirements of the license condition are as follows:

2.G SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3), and F of this license within 24 hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region IV, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days.

The existing conditions in Section 2.C that are subject to the current reporting requirement consist of the following:

2.C(1) Maximum Power Level

Southern California Edison Company (SCE) is authorized to operate the facility at reactor core power levels not in excess of full power (3438 megawatts thermal).

2.C(3) Antitrust Conditions

SCE shall comply with the antitrust conditions delineated in Appendix C to this license.

2.F This license is subject to the following additional condition for the protection of the environment:

Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

3.0 BACKGROUND

The background of this application is adequately addressed by the NRC Notice of Availability published on November 4, 2005 (70 FR 67202) and the Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

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 on November 4, 2005 (70 FR 67202) and the Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

5.0 TECHNICAL ANALYSIS

Southern California Edison (SCE) has reviewed the safety evaluation (SE) published on August 29, 2005, as part of the CLIP Notice of Opportunity to Comment. SCE has concluded that the justifications presented in the SE prepared by the NRC staff are applicable to SONGS, Units 2 and 3, and justify this amendment of the facility operating licenses for SONGS.

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 Opportunity to Comment published on August 29, 2005 (70 FR 51098).

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

SCE has reviewed the proposed no significant hazards consideration determination published on August 29, 2005 (70 FR 51098), as part of the CLIP Notice of Opportunity to Comment. SCE has concluded that the proposed determination presented in the notice is applicable to SONGS, and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

SCE has reviewed the environmental evaluation included in the model SE published on August 29, 2005 (70 FR 51098), as part of the CLIP Notice of Opportunity to Comment. SCE has concluded that the NRC staff's findings presented in that evaluation are applicable to SONGS, and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIP. SCE is not proposing variations or deviations from the changes described in the NRC staff's model SE published on August 29, 2005 (70 FR 51098).

10.0 REFERENCES

1. *Federal Register* Notice of Opportunity to Comment on Model Safety Evaluation on Elimination of Typical License Condition Requiring Reporting of Violations of Section 2.C of Operating License Using the Consolidated Line Item Improvement Process, August 29, 2005 (70 FR 51098)
2. *Federal Register* Notice of Availability of Model Application Concerning Elimination of Typical License Condition Requiring Reporting of Violations of Section 2.C of Operating License Using the Consolidated Line Item Improvement Process, November 4, 2005 (70 FR 67202)

Attachment A
(Existing Pages)
SONGS Unit 2

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 19, 2004.
- F. This license is subject to the following additional condition for the protection of the environment:
- Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.
- G. SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3), and F of this license within 24 hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region IV, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days.
- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

* On September 29, 1983, the Safeguards Contingency Plan was made a separate, companion document to the Physical Security Plan pursuant to the authority of 10 CFR 50.54.

Attachment B
(Existing Pages)
SONGS Unit 3

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 19, 2004.
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- G. SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3) and F of this license within 24 hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region IV, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days.
- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- J. This license is effective as of the date of issuance and shall expire at midnight on November 15, 2022.

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Attachment C
(Proposed Pages)
(Redline and Strikeout)
SONGS Unit 2

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 19, 2004.
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- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

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Attachment D
(Proposed Pages)
(Redline and Strikeout)
SONGS Unit 3

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 19, 2004.
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- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
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- J. This license is effective as of the date of issuance and shall expire at midnight on November 15, 2022.

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Attachment E
(Proposed Pages)
SONGS Unit 2

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Attachment F
(Proposed Pages)
SONGS Unit 3

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