October 20, 2006

Mr. Richard M. Rosenblum
Senior Vice President and 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 - RECEIPT OF RESPONSE TO GENERIC LETTER 2003-01, "CONTROL ROOM HABITABILITY" (TAC NOS. MB9853 AND MB9854)

Dear Mr. Rosenblum:

The Nuclear Regulatory Commission acknowledges the receipt of your responses to Generic Letter (GL) 2003-01, "Control Room Habitability," dated August 5, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML032230360, Reference 1), November 26, 2003 (ADAMS Accession Number ML033370814, Reference 2), December 9, 2003 (ADAMS Accession Number ML033450328), and September 17, 2004 (ADAMS Accession Number ML042650353, Reference 3). This letter provides a status of your response and describes any additional information that may be necessary to consider your response to GL 2003-01 complete.

The GL requested that you confirm that your control rooms meet their design bases (e.g., General Design Criteria (GDC) 1, 3, 4, 5, and 19, draft GDC, or principal design criteria), with special attention to the determination: (1) of the most limiting unfiltered and/or filtered inleakage into the control room and comparison to values used in your design bases for meeting control room operator dose limits from accidents (GL 2003-01, Item 1a), (2) that the most limiting unfiltered inleakage is incorporated into your hazardous chemical assessments (GL 2003-01, Item 1b), and (3) that reactor control capability is maintained in the control room or at the alternate shutdown location in the event of smoke (GL 2003-01, Item 1b).

Reference 3 contained the results of American Society for Testing Materials (ASTM)- E741, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," tracer gas tests for the San Onofre Nuclear Generating Station, Units 2 and 3, control room which is common to both units and pressurized for accident mitigation. The maximum tested value for inleakage into the Control Room Envelope (CRE) was 67 standard cubic feet per minute (scfm), which is more than the value of 10 cfm assumed in your current design-basis radiological dose analyses for Control Room Habitability (CRH), and using Alternative Source Term (AST) methodology, the CRE was determined to be non-conforming but operable. In Reference 3, you stated you would submit a license amendment request (LAR) to change the accident source term to an AST and on December 27, 2004, you submitted the LAR (ADAMS Accession Number ML043650403). Additionally, it was determined that the maximum tested value for inleakage into the CRE was 645 (+/- 17) scfm for hazardous chemical events which is

less than the value of 2,201.3 scfm assumed in your current design-basis hazardous chemical analysis. You also indicated, in Reference 1, that reactor control capability is maintained from either the control room or the evacuation shutdown panel in the event of smoke.

The GL further requested that you assess your Technical Specifications (TSs) to determine if they verify the integrity of the CRE, including ongoing verification of the inleakage assumed in the design-basis analysis for control room habitability in light of the demonstrated inadequacy of a delta (Δ) P measurement to alone provide such verification (GL 2003-01, Item 1c). As permitted by the GL, you provided a schedule for revising the surveillance requirement (SR) in the TSs to reference an acceptable surveillance methodology. In Reference 2, you committed to submit a proposed TS change to adopt TS SRs that verify CRH per Technical Specification Task Force Traveler (TSTF)-448 within 90 days following NRC approval of TSTF-448.

The GL also requested information on any compensatory measures in use to demonstrate control room habitability, and plans to retire them (GL 2003-01, Item 2). In response, you stated that there are no compensatory measures needed to be in place to demonstrate control room habitability, however, your reliance on AST methodology to demonstrate control room operabilty is considered a compensatory measure. As noted above, you have submitted an LAR to revise your design-basis radiological dose analysis using the AST methodology and when the license amendment is issued, reliance on AST methodology will no longer be considered a compensatory measure.

The information you provided also supported the conclusion that you are committed toward meeting the GDC regarding control room habitability.

Your commitment to submit an LAR based on TSTF-448, following our formal review and approval, is acceptable for purposes of closing out your response to GL 2003-01. The staff will monitor submission of the LAR and interact with you as necessary during the amendment process.

If you have any questions, please contact 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

cc: See next page

less than the value of 2,201.3 scfm assumed in your current design-basis hazardous chemical analysis. You also indicated, in Reference 1, that reactor control capability is maintained from either the control room or the evacuation shutdown panel in the event of smoke.

The GL further requested that you assess your Technical Specifications (TSs) to determine if they verify the integrity of the CRE, including ongoing verification of the inleakage assumed in the design-basis analysis for control room habitability in light of the demonstrated inadequacy of a delta (Δ) P measurement to alone provide such verification (GL 2003-01, Item 1c). As permitted by the GL, you provided a schedule for revising the surveillance requirement (SR) in the TSs to reference an acceptable surveillance methodology. In Reference 2, you committed to submit a proposed TS change to adopt TS SRs that verify CRH per Technical Specification Task Force Traveler (TSTF)-448 within 90 days following NRC approval of TSTF-448.

The GL also requested information on any compensatory measures in use to demonstrate control room habitability, and plans to retire them (GL 2003-01, Item 2). In response, you stated that there are no compensatory measures needed to be in place to demonstrate control room habitability, however, your reliance on AST methodology to demonstrate control room operabilty is considered a compensatory measure. As noted above, you have submitted an LAR to revise your design-basis radiological dose analysis using the AST methodology and when the license amendment is issued, reliance on AST methodology will no longer be considered a compensatory measure.

The information you provided also supported the conclusion that you are committed toward meeting the GDC regarding control room habitability.

Your commitment to submit an LAR based on TSTF-448, following our formal review and approval, is acceptable for purposes of closing out your response to GL 2003-01. The staff will monitor submission of the LAR and interact with you as necessary during the amendment process.

If you have any questions, please contact 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
cc: See next page
DISTRIBUTION:

PUBLIC	LPLIV r/f	RidsNrrDorlLpl4
RidsNrrPMNKalyanam	RidsNrrLALFeizollahi	RidsNrrDciCsgb
RidsAcrsAcnwMailCenter	RidsOgcRp	JRobinson, DPR
RidsRgn4MailCenter (TPruett)	RidsNrrDorlDpr	

ACCESSION NO: ML062960355 * No major change from Staff provided input

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	DSS/SCVB/BC	DPR/PGCB/BC	NRR/LPL4/BC
NAME	NKalyanam	LFeizollahi	RDennig	CJackson	DTerao
DATE	10/5/06	10/5/06	10/10/06	10/19/06	10/20/06

OFFICIAL RECORD COPY

cc:
Mr. Daniel P. Breig
Southern California Edison Company
San Onofre Nuclear Generating Station
P. O. Box 128
San Clemente, CA 92674-0128

Mr. Douglas K. Porter, Esquire
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Mr. David Spath, Chief
Division of Drinking Water and
Environmental Management
P. O. Box 942732
Sacramento, CA 94234-7320

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

Mark L. Parsons
Deputy City Attorney
City of Riverside
3900 Main Street
Riverside, CA 92522

Mr. Gary L. Nolff
Assistant Director - Resources
City of Riverside
3900 Main Street
Riverside, CA 92522

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mr. Michael R. Olson
San Diego Gas & Electric Company
8315 Century Park Ct. CP21G
San Diego, CA 92123-1548

Director, Radiologic Health Branch
State Department of Health Services
P.O. Box 997414, MS 7610
Sacramento, CA 95899-7414

Resident Inspector/San Onofre NPS
c/o U.S. Nuclear Regulatory Commission
Post Office Box 4329
San Clemente, CA 92674

Mayor
City of San Clemente
100 Avenida Presidio
San Clemente, CA 92672

Mr. James T. Reilly
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Mr. James D. Boyd, Commissioner
California Energy Commission
1516 Ninth Street (MS 31)
Sacramento, CA 95814

Mr. Ray Waldo, Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92764-0128

Mr. Brian Katz
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92764-0128

cc:
Mr. Steve Hsu
Department of Health Services
Radiologic Health Branch
MS 7610, P.O. Box 997414
Sacramento, CA 95899

Mr. A. Edward Scherer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128