

November 13, 2006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: **Docket Nos. 50-361 and 50-362**
Additional Information in Support of Amendment Application Numbers
243 and 227 (TAC Nos. MD1405 and MD1406)
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter from N. Kalyanam (NRC) to Richard M. Rosenblum (SCE) dated October 26, 2006; Subject: San Onofre Nuclear Generating Station, Units 2 and 3 – Request for Additional Information on the Proposed Amendment to Revise Fuel Storage Pool Boron Concentration (TAC Nos. MD1405 and MD1406)

Dear Sir or Madam:

This letter responds to the October 26, 2006 U.S. Nuclear Regulatory Commission request for additional information (Reference). The enclosure contains an answer to the first question, and a schedule to provide the answer to the second question.

Should you have any questions, please contact Ms. Lynn Pressey at 949-368-6351.

Sincerely,



Enclosure: As stated

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

Southern California Edison (SCE)

San Onofre Nuclear Generating Station (SONGS), Units 2 and 3

Docket Nos. 50-361 and 50-362

Enclosure

Responses to NRC Staff Questions Regarding Proposed Change Notice
(PCN) 556

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NRC Question 1:

Section 2.10 of the Spent Fuel Pool (SFP) Boron Dilution Analysis states that the SFP boron concentration must be verified in accordance with LCS 3.7.116 at least every 30 days. Clarify how this verification relates to Technical specification SR 3.7.17.1, which requires verification of the SFP boron concentration every 7 days.

SCE Response to Question 1:

Licensee Controlled Specification (LCS) 3.7.116 and Technical Specification Surveillance Requirement (SR) 3.7.17.1, have separate periods of applicability.

The applicability of LCS 3.7.116 is when fuel is stored in the fuel storage pool and no fuel movement is being performed in the fuel storage pool.

The applicability of (SR) 3.7.17.1 is when fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool.

The fuel storage verification is performed after fuel is moved into, out of, or within the spent fuel pool to validate that all fuel assemblies are stored in their proper location. When fuel movement begins SCE is then required to sample boron every seven days in accordance with SR 3.7.17.1 until such time as the fuel storage validation is complete. Once the fuel storage validation is completed showing all fuel is properly stored SR 3.7.17.1 is no longer applicable and the spent fuel pool is sampled in accordance with the requirements of LCS 3.7.116.

The Basis for applicability for the Limiting Condition of Operation (LCO) for TS 3.7.17.1 is that it applies whenever fuel assemblies are stored in the spent fuel pool until a complete spent fuel pool verification has been performed following the last movement of fuel assemblies in the spent fuel pool. This LCO does not apply following the verification since the verification would confirm that there are no misloaded fuel assemblies. With no further fuel assembly movements in progress, there is no potential for a misloaded fuel assembly or a dropped fuel assembly.

Notwithstanding the TS and LCS applicability described above it has been SCE's practice to sample SFP boron concentration weekly. Additionally, SCE intends on deleting LCS 3.7.116 following the approval of the proposed amendment to revise the SFP boron concentration.

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NRC Question 2:

Given the many dilution paths mentioned, describe how the 7 day surveillance interval is adequate to detect slow boron dilution events. In particular, address the case where unborated makeup is provided for a small (1 - 2 gallons per minute) leak that may be overlooked as an unusual condition and processed through radwaste or be otherwise undetected.

SCE Response to Question 2:

SCE plans to provide the answer to this question by the end of December 2006. This schedule has been discussed with the NRC Project Manager and we understand it is acceptable.