

April 4, 2007

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 -
ISSUANCE OF AMENDMENTS RE: EMERGENCY DIESEL GENERATOR
FUEL OIL VOLUME REQUIREMENTS (TAC NOS. MD2298 AND MD2299)

Dear Mr. Rosenblum:

The Commission has issued the enclosed Amendment No. 211 to Facility Operating License No. NPF-10 and Amendment No. 203 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 in response to your application dated June 2, 2006, as supplemented by letter dated October 19, 2006.

The amendments increase the required amount of stored diesel fuel oil to support a change to Ultra Low Sulfur Diesel fuel oil from the California diesel fuel oil presently in use. This change in the type of fuel oil is mandated by California air pollution control regulations.

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/

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

Enclosures: 1. Amendment No. 211 to NPF-10
2. Amendment No. 203 to NPF-15
3. Safety Evaluation

cc w/encls: See next page

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*See prior Concurrence

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/ADES/DSS/SBPB*	OGC - NLO w/comments*	NRR/LPL4/BC
NAME	NKalyanam	JBurkhardt	JSegala	AHodgdon	DTERAO
DATE	4/3/07	4/3/07	3/22/07	4/22/07	4/4/07

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SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 211
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 2, 2006, as supplemented by letter dated October 19, 2006, 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.
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/

David Terao, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Facility
Operating License and
Technical Specifications

Date of Issuance: April 4, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 211

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Facility Operating License No. NPF-10 and 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.

Facility Operating License

REMOVE

INSERT

- 3 -

- 3 -

Technical Specifications

REMOVE

INSERT

3.8-6

3.8-6

3.8-20

3.8-20

3.8-21

3.8-21

- (3) SCE, pursuant to the Act and 10 CFR Part 70, to receive, possess, and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (4) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of San Onofre Nuclear Generating Station, Units 1 and 2 and by the decommissioning of San Onofre Nuclear Generating Station Unit 1.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(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) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 211, 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.

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 203
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 2, 2006, as supplemented by letter dated October 19, 2006, 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.
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/

David Terao, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Facility
Operating License and
Technical Specifications

Date of Issuance: April 4, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 203

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Facility Operating License No. NPF-15 and 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.

Facility Operating License

REMOVE

INSERT

- 3 -

- 3 -

Technical Specifications

REMOVE

INSERT

3.8-6

3.8-6

3.8-20

3.8-20

3.8-21

3.8-21

- (3) SCE, pursuant to the Act and 10 CFR Part 70, to receive, possess, and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (4) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear materials as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of San Onofre Nuclear Generating Station, Units 1 and 3 and by the decommissioning of San Onofre Nuclear Generating Station Unit 1.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(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) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 203, 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.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 211 TO FACILITY OPERATING LICENSE NO. NPF-10
AND AMENDMENT NO. 203 TO FACILITY OPERATING LICENSE NO. NPF-15
SOUTHERN CALIFORNIA EDISON COMPANY
SAN DIEGO GAS AND ELECTRIC COMPANY
THE CITY OF RIVERSIDE, CALIFORNIA
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By application dated June 2, 2006 (available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML061590319), as supplemented by letter dated October 19, 2006 (ADAMS under Accession No. ML062970105), Southern California Edison (the licensee) requested changes to the Technical Specifications (TSs) for the San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3). The October 19, 2006, letter provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original no significant hazards consideration determination.

The requested change would revise TSs 3.8.1, "AC [Alternating Current] Sources -Operating," and 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to increase the required amount of stored diesel fuel oil to support a change to Ultra Low Sulfur Diesel (ULSD) fuel oil from the California diesel fuel oil presently in use. This change in the type of diesel fuel oil is mandated by California air pollution control regulations.

SONGS is required by California State regulation (Title 13, California Code of Regulations, Division 3, Chapter 5, Article 2, Sections 2280-2285) as implemented by the San Diego Air Pollution Control District to discontinue purchase of the current California diesel fuel oil and begin purchasing ULSD fuel oil for emissions control purposes. The worst case lower heating value (LHV) of ULSD fuel oil is slightly lower on a per gallon basis than that of the existing fuel oil. Therefore, the heat content of the fuel oil on a per gallon basis may also be lower. Calculations have been performed to determine the amount of fuel oil required based on the worst case LHV of ULSD fuel. The use of ULSD fuel oil, which has a heat content lower than Environmental Protection Agency (EPA) fuel oil, will result in a higher emergency diesel generator (EDG) fuel oil consumption rate at SONGS 2 and 3. Consequently, the licensee has

proposed to increase the minimum EDG fuel oil inventory required to be maintained in the fuel oil storage tanks (FOSTs) and diesel generator (DG) fuel oil day tanks.

Specifically, the proposed changes would revise:

1.1 Technical Specification 3.8.3, Condition A

Existing TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," Condition A, currently states that during Modes 1 through 4, if one or more DG has a fuel oil level in the storage tank less than 45,662 gallons and greater than 39,468 gallons, then fuel oil level must be restored to within limits within 48 hours.

The revised TS 3.8.3, Condition A, states that during Modes 1 through 4, if one or more DG has a fuel oil level in the storage tank less than 48,400 gallons and greater than 41,800 gallons, then fuel oil level must be restored to within limits within 48 hours.

The 45,662/48,400 gallon storage level requirements are based on the need to maintain a 7-day supply of diesel fuel oil in Modes 1 through 4. The 39,468/41,800 gallon storage level requirements are based on the need to maintain at least a 6-day supply of diesel fuel oil in Modes 1 through 4. With less than a 6-day supply or between a 7-day supply and a 6-day supply for more than 48 hours, TS 3.8.3, Condition G, requires that the affected DG be declared inoperable immediately.

1.2 Technical Specification 3.8.3, Condition C

Existing TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," Condition C, states that during Modes 5 and 6, if one DG has a fuel oil level in the storage tank less than 41,691 gallons and greater than 35,735 gallons, then fuel oil level must be restored to within limits within 48 hours.

The revised TS 3.8.3 Condition C, states that during Modes 5 and 6, if one DG has a fuel oil level in the storage tank less than 43,600 gallons and greater than 37,400 gallons, then fuel oil level must be restored to within limits within 48 hours.

The 41,691/43,600 gallon storage level requirements are based on the need to maintain a 7-day supply of diesel fuel oil in Modes 5 and 6. The 35,735/37,400 gallon storage level requirements are based on the need to maintain at least a 6-day supply of diesel fuel oil in Modes 5 and 6. With less than a 6-day supply or between a 7-day supply and a 6-day supply for more than 48 hours, TS 3.8.3, Condition G requires that the affected DG be declared inoperable immediately.

1.3 Surveillance Requirement 3.8.3.1

Existing Surveillance Requirement (SR) 3.8.3.1 requires that each diesel FOST tank level be verified every 31 days to be greater than or equal to 45,662 gallons in Modes 1, 2, 3, or 4 and greater than or equal to 41,691 gallons in Modes 5 and 6.

The revised SR 3.8.3.1 requires that each FOST be verified every 31 days to contain greater than or equal to 48,400 gallons in Modes 1, 2, 3, or 4 and greater than or equal to 43,600 gallons level in Modes 5 or 6.

1.4 Surveillance Requirement 3.8.3.4

Existing SR 3.8.1.4 requires that each DG fuel oil day tank level be verified every 31 days to be greater than or equal to 30 inches of diesel fuel oil.

The revised SR 3.8.1.4 requires that each DG fuel oil day tank level be verified every 31 days to be greater than or equal to 31.5 inches of diesel fuel oil.

The day tank level requirement is based on the need to maintain at least a 1-hour supply of diesel fuel plus a 10-percent margin.

In summary, the proposed change would revise the Operating Licenses for SONGS 2 and 3 to amend TS 3.8.1, "AC Sources - Operating," and TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to increase the required amount of stored diesel fuel oil to support the use of ULSD fuel oil.

2.0 SYSTEM DESCRIPTION

The standby power supply for SONGS 2 and 3 consists of one EDG for each safety-related load group (two per unit) including a fuel oil storage and transfer system for each DG.

The system consists of four independent fuel oil storage and transfer trains; i.e., one train per DG (two trains per nuclear unit). Each train consists of a FOST, two fuel oil transfer pumps, fuel supply and fuel return piping, a day tank and the associated valves, fittings, and instrumentation.

The four DG FOSTs are located underground. Each has a capacity of 55,000 gallons. The system for each unit is designed in such a way that fuel oil can be supplied by either fuel oil transfer pump from either FOST to replenish the EDG day tanks as required. The DG fuel oil system is designed to American National Standards Institute (ANSI) Standard N195-1976, "Fuel Oil System for Standby Diesel Generators," excepting Section 8(2)(a)'s requirement for a high level day tank alarm.

Each DG is required to have sufficient stored diesel fuel oil to operate for a period of 7 days while supplying maximum post loss-of-coolant accident (LOCA) load demand. The TS fuel oil inventory requirements for the diesel FOSTs are based on the fuel volume needed for 7 days of DG operation.

The DG fuel oil day tanks, each with a capacity of 550 gallons, are located within the DG building. The volume in each day tank permits at least 1 hour of operation of its associated diesel engine installation at 100 percent of rated load, plus 10-percent margin, without resupply from a DG FOST.

3.0 REGULATORY EVALUATION

Section 182.a of the Atomic Energy Act of 1954, as amended, requires applicants for nuclear power plant operating licenses to include TSs as a part of the license. The Nuclear Regulatory Commission's (NRC's) regulatory requirements related to the content of TSs are set forth in Section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR), which requires that the TSs include items in five specific categories: (1) safety limits, limiting safety settings and limiting control settings; (2) limiting conditions for operation; (3) SRs; (4) design features; and (5) administrative controls.

Paragraph 50.36(c)(2)(ii) of 10 CFR sets forth four criteria to be used in determining whether an LCO is required to be included in the TSs. Fuel oil inventories are required to be maintained in the FOSTs to ensure minimum required EDG operation for 7 days following a LOCA; therefore, this satisfies 10 CFR 50.36(c)(2)(ii) Criterion 2 which requires inclusion in TSs of:

A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

In compliance with the above criterion, Section 9.5.4.3, "Safety Evaluation," of the SONGS 2 and 3 Updated Final Safety Analysis Report states the following:

- A. The total capacity of the underground diesel generator fuel oil storage tanks is sufficient for 7-day operation of both diesel generator installations for one unit at the actual time dependent load profile of section 8.3, Table 8.3.1, for a design basis accident. Within this period, additional fuel could be delivered to the plant site by truck, rail, or helicopter.
- B. There is complete physical redundancy of components in the diesel generator fuel oil system. An independent fuel supply train consisting of fuel storage tank, transfer pumps, piping and valves, is provided for each diesel generator. (There are two diesel generators per nuclear unit.) Two transfer pumps are provided for each fuel supply train so that any pump can be removed for repair without affecting the redundancy of the fuel oil supply system. Each pump is powered from the bus on which the diesel generator it serves is connected. Failure of a pump or a diesel generator would not affect the operability of any component in another train.
- C. The diesel generator fuel oil system is designed in accordance with Seismic Category I requirements as specified in section 3.2.

4.0 TECHNICAL EVALUATION

To comply with the California Air Resources Board regulations, the licensee recalculated the LCO 3.8.3 fuel oil inventory requirements based on the slightly lower heat content ULSD fuel oil. Other assumptions (including minimum engineered safety feature operating conditions; the amount of unusable volume and vortexing) used in the original calculation were not changed. Consequently, the licensee proposed the following changes to the current TS 3.8.3:

The revised TS 3.8.3, Condition A, requires that when one or more DGs are found with fuel volume less than 48,400 gallons and greater than 41,800 gallons in the storage tank during Modes 1, 2, 3, or 4, the fuel oil level must be restored to within limits within 48 hours.

The revised TS 3.8.3, Condition C, requires that when one or more DGs are found with fuel volume less than 43,600 gallons and greater than 37,400 gallons in the storage tank during Modes 5 or 6, the fuel oil level must be restored to within limits within 48 hours.

The revised SR 3.8.3.1 requires that each FOST be verified every 31 days to contain greater than or equal to 48,400 gallons in Modes 1, 2, 3, or 4 and greater than or equal to 43,600 gallons in Modes 5 or 6.

The revised SR 3.8.1.4 requires that each DG fuel oil day tank level be verified every 31 days to be greater than or equal to 31.5 inches of diesel fuel oil.

Based on its review, the NRC staff finds that the above proposed changes do not change the SONGS 2 and 3 licensing basis requirement to maintain a minimum fuel oil required to support a 7-day EDG operation under accident conditions, assuming the loss of all offsite power. The four existing 55,000 gallon tanks are sufficiently large to accommodate the increased volumes; therefore, the NRC staff finds the above proposed changes to the current TSs acceptable.

The licensee used the 10 CFR 50.59 evaluation process to evaluate the effect of ULSD on various other aspects of the diesel engine, such as: ULSD fuel energy content, fuel chemistry, lubricity and effects on engine components, conductivity, compatibility of the fuel with FOST liner, fuel transfer system components, compatibility with engine lubricating oil, EDG performance with ULSD fuel, and long-term storage of the fuel. The evaluation indicates that there will be no negative impact on the SONGS EDGs with the introduction of ULSD fuel oil. The details of the evaluation are contained in the letter dated October 19, 2006.

The NRC staff has reviewed the licensee's technical and regulatory analyses in support of its proposed license amendment, which are described in Sections 4.0 and 5.0 of the licensee's submittal. Based on its evaluation described above, the staff concludes that the proposed changes remain consistent with the intent of the guidance described in ANSI N195-1976 regarding the design requirements for the EDG fuel oil inventory. Therefore, the NRC staff finds the above proposed TS changes acceptable.

5.0 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.

6.0 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 change surveillance requirements. The NRC staff has determined that the amendments involve 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 amendments involve no significant hazards consideration, and there has been no public comment on such finding published July 18, 2006 (71 FR 40754). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

7.0 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: N. Kalyanam

Date: April 4, 2007

San Onofre Nuclear Generating Station
Units 2 and 3

cc:

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March 2006

San Onofre Nuclear Generating Station
Units 2 and 3

- 2-

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March 2006