

May 3, 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 -
REQUEST FOR ADDITIONAL INFORMATION ON THE PROPOSED
AMENDMENT REGARDING REVISION TO DC SOURCES - TSTF-360
(TAC NOS. MD5140 and MD5141)

Dear Mr. Rosenblum:

By letter dated March 30, 2007, Southern California Edison (the licensee, SCE) requested an amendment to Facility Operating License Nos. NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3), and Appendix A, Technical Specifications (TSs), of the Facility Operating Licenses. The proposed changes would adopt Technical Specifications Task Force Traveler 360, Revision 1 (TSTF-360), "DC [Direct Current] Electrical Rewrite." More specifically, the proposed changes would revise TS Section 3.8.1, "AC Sources - Operating," TS Section 3.8.4, "DC Sources - Operating," TS Section 3.8.5, "DC Sources - Shutdown," TS Section 3.8.6, "Battery Cell Parameters," TS Section 3.8.7, "Inverters - Operating," and TS Section 3.8.9, "Distribution Systems - Operating." The licensee also proposed adding TS Section 5.5.2.16, "Battery Monitoring and Maintenance Program."

After reviewing your request, the Nuclear Regulatory Commission (NRC) staff has determined that additional information outlined in the enclosure is needed to complete the review. We discussed this information with your staff by telephone on April 17, 2007, and they agreed to provide the additional information within 30 days of the receipt of this letter. In this call, the NRC staff also conveyed the low quality of the submittal, considering the resolutions that were reached following the July 12, 2006, TSTF-360 public meeting, at which SONGS 2 and 3 were participants.

R. M. Rosenblum

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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

Enclosure: Request for Additional Information

cc: See next page

R. M. Rosenblum

-2-

May 3, 2007

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

Enclosure: Request for Additional Information

cc: See next page

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ADAMS Accession No.: ML071210493 NRR-088 *No major change from Staff provided RAI.

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NAME	NKalyanam:sp	JBurkhardt	GWilson	THiltz
DATE	5/2/07	5/2/07	4/30/07	5/3/07

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REQUEST FOR ADDITIONAL INFORMATION

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

SOUTHERN CALIFORNIA EDISON

ADOPTING TECHNICAL SPECIFICATIONS TASK FORCE

TRAVELER 360, REVISION 1, "DC ELECTRICAL REWRITE"

TAC NOS. MD5140 AND MD5141

DOCKET NOS. 50-361 AND 50-362

- 1) Provide an endorsement letter from your Battery Manufacturer(s) to show that float current monitoring can be used to identify a battery's state-of-charge and that the proposed float current value will remain adequate throughout the expected service life of the battery. This is consistent with the industry resolution that was reached following the July 12, 2006, Technical Specifications Task Force (TSTF)-360 public meeting.
- 2) Does the proposed 2 ampere float current limit indicate a fully charged battery? If not, provide a regulatory commitment to maintain a design margin to ensure that 2 amperes is indicative of a fully charged battery. This is consistent with the industry resolution that was reached following the July 12, 2006, TSTF-360 public meeting.
- 3) Identify the values for the minimum established design limits for float voltage and temperature in the Technical Specification (TS) Bases. This is consistent with the industry resolution that was reached following the July 12, 2006, TSTF-360 public meeting.
- 4) Provide the basis for the proposed 7-day battery charger Completion Time. Consistent with the industry resolution that was reached following the July 12, 2006, TSTF-360 public meeting, the staff requires that a risk-informed evaluation be performed in accordance with Regulatory Guides (RGs) 1.174 and 1.177 to support extending the battery charger Completion Time beyond 72 hours when using a non-Class 1E battery charger that is not capable of being supplied power from a source independent of the offsite power system (e.g., diesel generator). Furthermore, describe the 'alternate means' that is being credited for the proposed extended Completion Time.
- 5) Per RGs 1.174 and 1.177, provide the deterministic basis for the proposed battery Completion Time extension.
- 6) Provide the load profiles for all safety-related batteries that would be affected by the proposed TS changes.
- 7) Revise TS 5.5.2.16 wording to be consistent with the wording that was agreed upon at the July 12, 2006, TSTF-360 public meeting.

- 8) Provide a regulatory commitment to relocate specific gravity monitoring to the proposed Battery Monitoring and Maintenance Program. This is consistent with the industry resolution that was reached following the July 12, 2006, TSTF-360 public meeting.
- 9) On page 18 of the license amendment request dated March 30, 2007 (Agencywide Documents Access and Management System Accession No. ML070950192), the licensee stated the following:

The proposed change provides specific Actions and increased Completion Times for out-of-limits conditions for cell voltage, electrolyte level, and electrolyte temperature. These allowed times recognize the margins available, the minimal impact on the battery capacity and capability to perform its intended function, and the likelihood of effecting restoration in a timely fashion and avoiding an unnecessary plant shutdown.

Describe 'the margins available' portion of this statement.

- 10) Consistency with TSTF-360 and the Standard TSs is not an adequate basis for granting an amendment to the TSs. Provide a detailed justification for each proposed change that included this rationale as the basis for approval. Examples include the basis provided for proposed changes to limiting condition for operation (LCO) 3.8.4 (Change 2), LCO 3.8.5 (Change 2), and LCO 3.8.6 (Changes 3, 8, 12, 13,14, 16, and 17).
- 11) On page 32 of the license amendment request, the licensee stated the following:

The new 400 [ampere] (A) swing chargers and existing 300A chargers are adequate to support the design bases load requirements for various operating scenarios. In all cross-connect scenarios, the required charger(s) can supply the buses' steady-state loads and recharge the battery from a design minimum state within 24 hours.

However, the San Onofre Nuclear Generating Station Updated Final Safety Analysis states:

The capacity of each Class 1E battery charger is based on the largest combined demand of all the steady-state loads and the charging current required to restore the battery from the design minimum charge state to a 95% charged state within 12 hours, irrespective of the status of the plant during which these demands occur. This is in compliance with the requirements of Regulatory Guide 1.32 (See Paragraph 8.3.2.2.1.4).

Describe the discrepancy in the capability of the Class 1E battery chargers.

- 12) The TS Bases are provided for information only and have no regulatory standing, therefore, the staff cannot use them in evaluating the proposed changes. Provide a detailed justification for each proposed change in lieu of referencing the TS Bases for additional supporting information. Examples include item (1) on page 15 and item (6) on page 18 of the license amendment request.

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-

cc:

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March 2006