June 5, 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: REVISIONS TO TECHNICAL SPECIFICATIONS 3.7.1 - MAIN STEAM SAFETY VALVES REQUIREMENTS AND ACTIONS (TAC NOS. MD3584 AND MD3585)

Dear Mr. Rosenblum:

The Commission has issued the enclosed Amendment No. 212 to Facility Operating License No. NPF-10 and Amendment No. 204 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 (TSs) in response to your application dated November 7, 2006.

The amendments revise TS 3.7.1, ”Main Steam Safety Valves,” operability requirements and Linear Power Level High Trip setpoints.

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. 212 to NPF-10
2. Amendment No. 204 to NPF-15
3. Safety Evaluation

cc w/encls: See next page

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Southern California Edison Company
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OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DSS/SRXB	NRR/DIRS/ITSB	OGC - NLO w/comments	NRR/LPL4/BC
NAME	NKalyanam	JBurkhardt	GCranston*	TKobetz	JRund	THiltz
DATE	5/15/07	5/13/07	5/4/07	5/22/07	5/30/07	6/4/07

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San Onofre Nuclear Generating Station
Units 2 and 3

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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. 212
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 November 7, 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 and paragraph 2.C(2) of Facility Operating License No. NPF-10 as indicated in the attachment to this license amendment.

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/

Thomas G. Hiltz, 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: June 5, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 212

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
3.7-1	3.7-1
3.7-3	3.7-3
3.7-4	3.7-4

(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. 212, 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. 204
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 November 7, 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 and paragraph 2.C(2) of Facility Operating License No. NPF-15 as indicated in the attachment to this license amendment.

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/

Thomas G. Hiltz, 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: June 5, 2007

ATTACHMENT TO LICENSE AMENDMENT NO. 204

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
3.7-1	3.7-1
3.7-3	3.7-3
3.7-4	3.7-4

(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. 204, 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. 212 TO FACILITY OPERATING LICENSE NO. NPF-10

AND AMENDMENT NO. 204 TO FACILITY OPERATING LICENSE NO. NPF-15

TS 3.7.1 - MAIN STEAM SAFETY VALVES REQUIREMENTS AND ACTIONS

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 letter dated November 7, 2006 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML063170129), Southern California Edison (SCE, the licensee), provided information to support technical specifications changes to TS 3.7.1, “Main Steam Safety Valves” for San Onofre Steam Generating Station, Units 2 and 3 (SONGS 2 and 3). The proposed technical specification (TS) changes will revise TS 3.7.1, “Main Steam Safety Valves,” (MSSVs) operability requirements and Linear Power Level High Trip (LPLHT) setpoints. The original required LPLHT values in TS Table 3.7.1-1 were derived from an equation based on the MSSVs relieving capacities. This equation did not consider the dynamic response of the plant transient. The current LPLHT values may be non-conservative. Therefore, the licensee performed new transient analyses to validate the LPLHT setpoints values. Based on the transient analyses results, the licensee proposed the following TS changes for TS 3.7.1:

a. Revise ACTION A from "one or more required MSSVs per SG [steam generator] inoperable" to "two to seven required MSSVs per SG inoperable."

b. Revise ACTION A.1 from "reduce power to less than the applicable % [percent] RTP [rated thermal power] listed in Table 3.7.1-1" to "reduce power to less than or equal to the applicable % RTP listed in Table 3.7.1-1."

c. Revise the Completion Time for Required Action A.2 from "12 hours" to "36 hours."

d. Revise Table 3.7.1-1 (1) to change title from "Maximum Allowable Linear Power Level High Trip Setpoints versus Inoperable MSSVs" to "Maximum Allowable

Power Level verus Inoperable MSSVs," (2) to delete the entry for 8 operable valves per SG (1 inoperable MSSV per SG), (3) to change the required LPLHT setpoint for 7 operable valves per SG (2 inoperable MSSVs per SG) to 95 percent RTP, (4) to change the required LPLHT setpoint for 6 operable valves per SG (3 inoperable MSSVs per SG) to 56 percent RTP, (5) to change the required LPLHT setpoint for 5 operable valves per SG (4 inoperable MSSVs per SG) to 46 percent RTP, and (6) to combine the entries for more than 4 inoperable MSSVs per SG into a single entry for 5 to 7 inoperable MSSVs per SG and change the LPLHT setpoint from “MODE 3" to not applicable.

e. Revise ACTION B entry condition as “Eight or more required MSSVs per SG inoperable."

f. Revise the footnote to Table 3.7.1-2 “Main Steam Safety Valves (Lift Settings),” from "LCO [limiting condition of operation] 5.5.2.10" to "Technical Specification 5.5.2.10.”

2.0 REGULATORY EVALUATION

The U.S. Nuclear Regulatory Commission (NRC) staff finds that the licensee in Section 5.2 of its submittal identified the applicable regulatory requirements. The regulatory requirements related to the contents of TS are set forth in Section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR). In accordance with 10 CFR 50.36, the NRC staff and the Nuclear Steam Supplier System (NSSS) Owner’s group developed improved standard technical specifications (ISTS) that meet 10 CFR 50.36(c)(2)(ii) and 10 CFR 50.36(c)(3) requirements. The licensee is using the staff-approved NUREG-1432, Revision 3, “Standard Technical Specifications Combustion Engineering Plants.” The proposed TS changes are also consistent with NRC Information Notice (IN) 94-60, “Potential Overpressurization of Main Steam System,” and the TS Task Force (TSTF) Traveler 235, Revision 1.

3.0 TECHNICAL EVALUATION

The staff has reviewed the licensee's regulatory and technical analyses in support of its proposed license amendment which are described in Section 4.0 of the licensee's submittal. The detailed evaluation below will support the conclusion 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

SONGS 2 and 3 have nine MSSVs located on each main steam header, outside the containment, upstream of the main steam isolation valves. The primary purpose of the MSSVs is to provide overpressure protection for the secondary system. The MSSVs also provide protection against overpressurizing the reactor coolant pressure boundary by providing a heat sink for the removal of energy from the reactor coolant system (RCS) if the preferred heat sink, provided by the condenser and circulating water system, is not available. The MSSVs must have sufficient capacity to limit the secondary system pressure to 1210 pounds per square inch, absolute (psia) (110 percent of the 1100 pounds psia design pressure) in the event of an accident. When an MSSV is inoperable, TS 3.7.1 requires the LPLHT setpoint, and thus

reactor power, to be reduced in accordance with TS Table 3.7.1.1. The original required LPLHT values in TS Table 3.7.1.1 were derived from an equation based on the MSSV relieving capacities. In this equation, it was assumed that the maximum allowable initial power level is a linear function of MSSVs capacity. Westinghouse determined that this assumption is not correct and this equation did not consider the dynamic response of the plant to the transient condition. In 1994, the NRC issued IN 94-60, "Potential Overpressurization of Main Steam System," during periods when one or more MSSVs are inoperable. IN 94-60 identified that the method used by Westinghouse to calculate values may be non-conservative. Westinghouse developed an advisory letter, NSAL 94-001, to correct this issue. IN 94-60 recommended that transient analyses be re-performed to validate the required LPLHT values.

The licensee performed the limiting analysis for inoperable MSSVs. The limiting transient analysis is the Loss of Condenser Vaccum with the worst Single Active Failure (LOCV+SAF). This LOCV event can occur due to the failure of the circulating water system to supply cooling water, failure of the main condenser evacuation system to remove non-condensible gases, or excessive leakage of air through a turbine gland packing or burst diaphragm. The LOCV event leads to loss of normal feedwater flow and loss of turbine load which results in the rapid heatup and pressurization of the RCS. The new analyses were performed in accordance with the NRC-approved SONGS 2 and 3 reload analysis methodology, "SCE-9801 P-A, Reload Analysis Methodology for the San Onofre Nuclear Generating Station Units 2 and 3," dated June 1999.

The results of the analyses indicate that there is no need to reduce power when there are zero, one, or two inoperable MSSVs per SG as shown in Figures 3, 4, and 5 (Reference 1). The maximum allowable LPLHT setpoint for two inoperable MSSVs per SG (seven operable MSSVs per SG) will increase from 86.3 percent RTP to 95 percent RTP. The maximum power for this condition will be set to 95 percent considering trip and power measurement uncertainties were accounted for in setting the LPLHT setpoint, and margin to the trip will be maintained by the operating procedures. When three or four MSSVs are inoperable per SG, it was possible for the peak secondary pressure to increase significantly as the initial power level decreases as shown in Figures 1 and 2 (Reference 1). As the initial power level decreases, the time needed to reach the reactor trip increases. At some power level, the reactor trip becomes sufficiently delayed such that the control element assembly (CEA) insertion does not occur in time to mitigate the SG pressure rise. Figure 1 (Reference 1) for three inoperable MSSVs per SG, approximately 68 percent RTP, the reactor trip occurs early enough that CEA insertion mitigates the SG pressure rise. The acceptance criterion for SG pressure is not being met from 62 percent RTP to 68 percent RTP. The acceptance criterion is met from 68 percent RTP to 91 percent RTP. The maximum allowable LPLHT setpoint for three inoperable MSSVs per SG will decrease from 74 percent RTP to 56 percent RTP. The maximum allowable power for this condition will be set to 56 percent RTP. The maximum allowable LPLHT setpoint for four inoperable MSSVs per SG will decrease from 61 percent RTP to 46 percent RTP. The maximum allowable power for this condition will be set to 46 percent RTP. The licensee has established administrative controls to account for the non-conservative TS Table 3.7.1.-1 values for three and four inoperable MSSVs per SG.

The updated final safety analysis report (FSAR) Section 15.10.2.2.3 LOCV+SAF transient analyses results showed that the RCS pressure (2716 psia) remained below 110 percent of the RCS design pressure value (2750 psia) and that the secondary system pressure (1183 psia) remained below 110 percent of the secondary design pressure (1210 psia).

The first entry (for eight operable MSSVs or one inoperable MSSV) is being deleted and Table 3.7.1-1 is reformatted and revised as follows:

Table 3.7.1-1
Maximum Allowable Power Level Versus Inoperable MSSVs

Number of Inoperable MSSVs per SG	Maximum Allowable Power (percent RTP)	Maximum Allowable LPLHT (percent RTP)
2	95	95
3	56	56
4	46	46
5 to 7	MODE 3	Not Applicable

The licensee will revise the following other items for TS 3.7.1:

TS 3.7.1 Required ACTION A

Revise ACTION A from one or more required MSSVs per SG inoperable to two to seven required MSSVs per SG inoperable.

Revise ACTION A.1 from reduce power to less than the applicable percent RTP listed in Table 3.7.1-1 to reduce power to less than or equal to the applicable percent RTP as listed in Table 3.7.1-1.

Revise the Completion Time for required Action A.2 from “12 hours” to “36 hours.” This time is required to allow for correction of the MSSV inoperability before reducing the setpoints and the time required to prepare, perform the power reduction, and adjust each channel. This is consistent with TSTF-235, Revision 1, and is acceptable.

TS 3.7.1 ACTION B

ACTION B entry condition will be revised as “eight or more required MSSVs per SG inoperable.” This will be consistent with the wording used in ACTION A.

TS Table 3.7.1-2

Revise the footnote to Table 3.7.1-2 from "LCO 5.5.2.10" to "Technical Specification 5.5.2.10." This is an editorial change.

The TS 3.7.1 proposed TS changes are consistent with IN 94-60 and TSTF 235, Revision 1. The revised TS 3.7.1 is an enhancement to the plant safety and we find them acceptable.

4.0 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.

5.0 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. 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 December 19, 2006 (71 FR 75999). 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.

6.0 CONCLUSION

The staff has reviewed the proposed TS changes to revise MSSVs operability and RTP requirements during the limiting transient (LOCV+SAF) conditions. The licensee complied with IN 94-60 and met 10 CFR 50.36 requirements. The proposed TS changes are also consistent with NUREG-1432, Revision 3, and TSTF 235, Revision 1. Therefore, the NRC staff has concluded that the proposed TS changes are acceptable. The NRC staff finds that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in this manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. Letter from Brian Katz (the licensee) to NRC regarding the license amendment request to revise main steam safety valve requirements and Actions (TS 3.7.1) for San Onofre Nuclear Generating Station, Units 2 and 3, dated November 7, 2006.

2. NRC Information Notice 94-60, "Potential Overpressurization of Main Steam System."

3. NUREG-1432, Revision 3, "Standard Technical Specifications for Combustion Engineering Plants."

4. Technical Specification Task Force Traveler 235, Revision 1, "MSSV Changes."

5. SCE-9801-P-A, "Reload Analysis Methodology for the San Onofre Nuclear Generating Station, Units 2 and 3," dated June 1999.

Principal Contributor: K. Desai

Date: June 5, 2007