

August 12, 2008

Mr. Ross T. Ridenoure
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 - AUDIT
OF THE LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS
(TAC NOS. MD9333 AND MD9334)

Dear Mr. Ridenoure:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

An audit of San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3), commitment management program was performed at the plant site on July 28, 2008. The NRC staff concludes, based on the audit, that Southern California Edison (the licensee) has implemented NRC commitments on a timely basis, and (2) the licensee has implemented an effective program for managing NRC commitment changes at Songs 2 and 3. The details of the audit including the NRC staff observations and recommendations are set forth in the enclosed audit report.

- 2 -

The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted 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:
Audit Report

cc w/encl: See next page

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San Onofre Nuclear Generating Station
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(June 2008)

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

SOUTHERN CALIFORNIA EDISON COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

NEI-99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and licensing activities (bulletins, generic letters, etc.).

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3), commitment management program was performed at the plant site on July 28, 2008. The audit consisted of two parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing actions/activities. For commitments that had not yet been implemented, the NRC staff aimed to ascertain that they have been captured in an effective program for future implementation.

ENCLOSURE

2.1.1 Audit Scope

The audit addressed a sample of commitments made, mostly during the review period of the last 3 years. Some in the sample were chosen by the NRC staff, and the rest jointly by the staff and the licensee. The audit focused on regulatory commitments made in writing to the NRC as a result of past licensing actions (amendments, exemptions, relief requests, etc.) or licensing activities (bulletins, generic letters, etc.).

The SONGS 2 and 3 Commitment Tracking System includes items that fall outside the definition of commitments defined above and the audit generally excluded these commitments which are internal to licensee processes:

1. Commitments made on the licensee's own initiative among internal organizational components.
2. Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date).
3. Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

Southern California Edison (the licensee) has implemented General Procedure SO123-XV-39, "Regulatory Commitment Tracking (RCT) Program," which identifies the methods and site organization tools for managing development, review, and implementation of station commitments. A commitment tracking system (CTS) database, "MOSAIC" is currently used in conjunction with other information sources to address and track regulatory commitments. The licensee is, however, in the process of changing the CTS database to "SAP."

The documents furnished by the licensee during the audit included summary sheets providing the status of the commitments and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). The NRC staff reviewed the documents and summarized the selected commitments information in the attachment to this audit report.

The staff audit was intended to confirm that the licensee has documented its implementation of its regulatory commitments made to the NRC staff as part of past licensing communications, and the commitments that had not yet been implemented or incorporated in design bases documents are captured in an effective manner for future implementation.

The NRC staff audit of the licensee's commitment management program for SONGS 2 and 3 did not identify any regulatory commitments that were not satisfied or incorporated. The licensee has maintained the database well and the commitments selected for this audit were easily traceable in the database. In case the commitment was already incorporated, the database provided the status of the commitment providing reference to the implementation document.

Based on the results of the on-site audit, the NRC staff believes the licensee has implemented the regulatory commitments management program effectively in accordance with LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," and consistent with NEI 99-04.

The attachment to this audit report contains details of the audit and a summary of the audit results.

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The focus of this part of the audit was to verify that the licensee has established administrative controls for satisfying, modifying, or deleting commitments made to the NRC. The NRC staff found that the process sets forth the need for identifying, initiating, tracking, and reporting commitments, managing a change or deviation from a previously completed commitment.

As set forth in Section 2.1 above, the NRC staff found that the licensee had addressed each regulatory commitment selected for this audit. As a result of review of the licensee's information, as well as information from other sources, the NRC staff found no reason to differ from the licensee's reported status of the audited commitments. Thus, the NRC staff surmises that the procedure used by the licensee to manage commitments is appropriate and effective

2.2.1 Audit Results

The licensee carries out its obligations under its regulatory commitments by the processes that are outlined in the procedures. Any changes to the commitments are processed through the established processes and changes are reported to the NRC in accordance with the recommendations of LIC-105. However, no commitment changes were identified during the audit (for the commitments included in the scope of review), except for a change to an implementation date

Based on the results of the on-site audit, the NRC staff believes the licensee has implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04.

Table 1 summarizes what the NRC staff observed as the current status of licensee commitments.

3.0 OBSERVATIONS AND RECOMMENDATIONS

The NRC staff audit of Southern California Edison's commitment management program for SONGS 2 and 3 did not identify any regulatory commitments that were not satisfied or incorporated. The licensee has maintained the Regulatory Commitment Tracking (RCT) Program at a more than satisfactory level and the commitments selected for this audit were easily traceable in the RCT. The RCT provided an accurate status of the commitment as per SCE's RCT Program, General Procedure Rev.9, SO123-XV-39 and provided the reference to the implementation document.

3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, (1) the licensee had implemented or is tracking for future implementation regulatory commitments; and (2) the licensee had implemented an effective program to manage regulatory commitment changes.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Linda Conklin and Malcom McGawn

Principal Contributors: N. Kalyanam
G. Lappert

Date: August 12, 2008

Attachment: Summary of Audit Results

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS

PERFORMED ON JULY 28, 2008

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 & 3

Letter	Subject	Commitment No. (Action Request (AR) No.)	Description of Commitment	Implementation Status
Letter from Southern California Edison (SCE) to Nuclear Regulatory Commission (NRC), dated June 18, 2007	Request for Emergency Plan (EP) Change – Increase in Emergency Response Organization (ERO) Augmentation Time from 60 to 90 minutes.	<u>060701155</u> 060701155-01 060701155-02 060701155-03 060701155-04 060701155-05 060701155-06 060701155-07 060701155-08	Assess for Regulatory Commitments Enhance operator training Evaluate current operator training Revise EP Implementation Procedures (EPIPs) Improve PIC data recovery rate Train the reactor operators Train the Plant Equipment Operators Revise the Emergency Plan	The referenced letter has 3 commitments within the document. The licensee has expanded the 3 commitments to 8 specific commitments for tracking the individual items. The Application is under review by the NRC staff. The ARs are accorded the “OPEN” status.
Letter from SCE to NRC dated February 19, 2008	Response to Request for Information (RAI) on Proposed Amendment Request for Degraded Voltage Setpoints	080101702-01	1) If the as-found relay setpoint is conservative with respect to the Allowable Value but outside its predefined as-found acceptance criteria band, then the relay shall be evaluated to verify that it is functioning as required before returning the relay to service. If the as-found relay setpoint is not conservative with respect to the Allowable Value, the relay shall be declared inoperable. 2) The relay setpoint shall be reset to a value that is within the as-left tolerance of the nominal relay setpoint; otherwise, the relay shall be declared inoperable. 3) If the as-found trip setpoint (TSP) is found to be non-conservative with respect to the allowable value (AV) specified in the Technical Specifications (TSs), the relay	Commitment 080101702-01 (which makes a new commitment and is tracked by 080101703) is closed Details of the commitments are under 080101703 (see Page 5 of 6 of this Table).

			<p>shall be declared inoperable and the associated TS action statement followed.</p> <p>4) If the as-found TSP is found to be conservative with respect to the AV, and outside the as-found predefined acceptance criteria band, but SCE is able to determine that the relay is functioning as required and can be reset to within the setting tolerance of the limiting TSP, or a value more conservative than the limiting TSP, then the relay may be considered operable. If it cannot be determined that the relay is functioning as required, it shall be declared inoperable and the associated TS actions followed.</p> <p>5) If the as-found TSP is outside the as-found predefined acceptance criteria band, the condition shall be entered into the corrective action program for further evaluation.</p>	
License Amendment Request (LAR) dated December 6, 2005, from SCE to NRC	LAR to Amend the TS to delete the requirements for fuel handling isolation signals and fuel handling building (FHB) post-accident cleanup filter systems	050900649	<ol style="list-style-type: none"> 1. SCE will implement the approved amendment 2. SCE will revise the TS bases to delete the bases for TS 3.3.10 and TS 3.7.14, 3. SCE will implement a Licensee Controlled Specification change to add the operability and functional requirements of the isolation and cleanup systems to the Licensee Controlled Specifications (LCS). 	<p>CLOSED –</p> <ol style="list-style-type: none"> a. USFAR Chapter 15 update completed on 1/29/07. b. Revised DBD-SO23-710 to remove the FHB isolation safety basis completed on 1/29/07. c. Revised system descriptions SD-SO23-435, 690 and 720 completed on 1/29/07. d. Revised OPS procedures (LCS 3.3.112) bases.
LAR, Proposed Change Notice (PCN) 555, dated December 27, 2004 from SCE to NRC	The LAR revises the SONGS 2 and 3 accident source term (AST) used in the design basis radiological consequences	041201316-01 041201316-02 041201316-03 041201316-04 041201316-05 041201316-06 041201316-07	<p>Letter contains 5 commitments</p> <p>Following approval of this license amendment request:</p> <ol style="list-style-type: none"> 1) Future revisions to Updated Final Safety Analyses Report (UFSAR) Chapter 15 design basis accident (DBA) control 	<p>The referenced letter has 5 commitments within the document.</p> <p>The licensee has expanded the 3 to 12 specific commitments for tracking the individual items.</p> <ol style="list-style-type: none"> a. 041201316-01 is open b. 041201316-02 (Determine

	analyses.	041201316-08 041201316-09 041201316-10 041201316-11 041201316-12	room and offsite radiological consequence analyses will be performed using AST methodology. 2) The manual dose calculation methodology as described in EP Implementation Procedures and other EP guidance documents will be revised to reflect AST methodology. 3) Raddose V dose assessment software will be evaluated by June 30, 2005, to determine what specific changes may be warranted in order to maintain consistency with the manual dose assessment calculation methodology. 4) Future revisions to Accident Monitoring setpoint calculations will reflect the AST source term. 5) SCE will provide the revised UFSAR sections to the NRC as part of its normal UFSAR update required by 10 CFR 50.71 (e).	changes to Raddose V software) is closed c. 041201316-03 (Provide the UFSAR Update to NRC) is open d. 041201316-04 (Accident Monitoring calculations will reflect AST methodology) is closed e. 041201316-05 (Determination of Changes to Raddose V) is closed f. 041201316-06 (Revise DBA to reflect AST methodology) is closed g. 041201316-07 (Revise EP Dose Assessment Methodology) is closed h. 041201316-08 (Revise existing dose calculations) is closed i. 041201316-09 (Revise UFSAR to reflect AST implementation) is closed j. 041201316-10 (Revise EPIPS) is closed k. 041201316-11 (Revise the current control room unfiltered leakage) is closed l. 041201316-12 is cancelled since it is a duplicate of 041201316-052
Letter dated October 20, 2006 from SCE to NRC original letter dated May 11, 2006	Additional information supporting the Third Ten-Year ISI interval Relief Request ISI-3-22 for Alternative to ASME Code Rules for the Inside Diameter Structural Weld Overlay Repair Process for Control Element	042002292-15 042002292-16	SCE will provide: 1) A comparison of the proposed inspection technique to the technique used in the Electric Power Research Institute (EPRI) Material Reliability Program (MRP)-89 demonstration report, and 2) The results of the Westinghouse technical justification analysis of the capability to monitor the residual indication and detect future growth in a manner consistent with the original EPRI - MRP demonstration.	The 2 Commitments are cancelled since SCE did not repair the reactor vessel head during the outage and did not use ISI-3-22

	Drive Mechanism (CEDM) #56			
Letters dated May 11, and November 20, 2006 from SCE to NRC (Unit 3)	ISI Interval RR ISI-3-1-21 for the Embedded Flaw Repair Process for CEDM # 56	041002292-19 041002292-20	Commitments made in letter dated May 11, 2006: 1) If the established inspection criterion described in the enclosed request is exceeded, SCE will perform additional repairs on CEDM # 56. 2) Inspection results will be included in the 60-day post refueling outage inspection report in accordance with NRC Order EA-03-009.	The 2 commitments were closed by: a. Letter dated June 1, 2007, indicating that CEDM # 56 is not a defect and SCE has found nothing in the evaluation process to date, to contradict that belief. b. Letter dated August 31, 2007, indicating SCE is changing the inspection classification of the indication in the RVHP for CEDM # 56 from a defect to no detectable defect (NDD).
Letter dated October 23, 2006 from SCE to NRC (Unit 2 and 3)	Additional Information Supporting the Third Ten-Year Inservice Inspection RR ISI 3-24 and ISI 3-25 for the Use of Structural Weld Overlay and Associated Alternative Repair Techniques	050701323-32 050701323-33 050701323-34 050701323-35 050701323-38 050701323-39	Commitment made: A report that summarizes the results of the examinations will be submitted to the NRC within fourteen days of completion of the final Ultrasonic Testing (UT) examination. 041201316-08 (Revise existing dose calculations) is closed	CLOSED - Letter from SCE to NRC dated November 20, 2006 submits a summary of the results of the UT Inspections on the 4 Pressurizer (PZR) nozzles. a. PZR spray nozzle to safe end (03-005-030) b. PZR safety nozzle to safe end (03-005-027) c. PZR safety nozzle to safe end (03-005-028) and d. PZR safety nozzle to safe end (03-005-029) No suspected flaw indications, such as lack of bond, weld flaws, planar flaws, or laminar flaws, were observed during the examinations.

<p>Response to RAI, from SCE to NRC, letter dated February 19, 2008</p>	<p>LAR for Loss of Voltage Signal Relay Replacement</p>	<p><u>080101703</u> 080101703-3 080101703-4 080101703-5</p>	<p>1) If the as-found relay setpoint is conservative with respect to the Allowable Value but outside its predefined as-found acceptance criteria band, then the relay shall be evaluated to verify that it is functioning as required before returning the relay to service. If the as-found relay setpoint is not conservative with respect to the Allowable Value, the relay shall be declared inoperable.</p> <p>2) The relay setpoint shall be reset to a value that is within the as-left tolerance of the nominal relay setpoint; otherwise, the relay shall be declared inoperable.</p> <p>3) If the as-found trip setpoint (TSP) is found to be non-conservative with respect to the allowable value (AV) specified in the Technical Specifications (TSs), the relay shall be declared inoperable and the associated TS action statement followed.</p> <p>4) If the as-found TSP is found to be conservative with respect to the AV, and outside the as-found predefined acceptance criteria band, but SCE is able to determine that the relay is functioning as required and can be reset to within the setting tolerance of the limiting TSP, or a value more conservative than the limiting TSP, then the relay may be considered operable. If it cannot be determined that the relay is functioning as required, it shall be declared inoperable and the associated TS actions followed.</p> <p>5) If the as-found TSP is outside the as-found predefined acceptance criteria band, the condition shall be entered into the corrective action program for further evaluation.</p>	<p>CLOSED</p> <p>a. 080101703-2 (Evaluate commitments with NEI 06-02) is closed</p> <p>b. 080101703-3 (Revise Maintenance and Construction Services procedures) is closed</p> <p>c. 080101703-4 (Update LOVS procedures SO2(3)-II011) is closed</p> <p>d. 080101703-5 (Update SO123-I-1.3, 6.2.2.11, and 6.3.7.6) is closed</p>
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<p>Issuance of License Amendment Nos. 159 and 150 dated October 7, 1999</p>	<p>Hydrogen Control System</p>	<p>000801190</p>	<p>IF at some future time, the Hydrogen Recombiners and/or the Hydrogen Purge System becomes inoperable, and Southern California Edison decides to permanently cease repair efforts, Southern California Edison will then inform the NRC of that decision as committed to in the SCE to NRC letter of 7/19/99.</p>	<p>CLOSED Commitment has been closed with letter to NRC dated February 5, 2007, indicating that the commitment has been met.</p>
<p>Letter dated March 7, 2007 from SCE to NRC</p>	<p>Inspection and Mitigation of Alloy 82/182 Pressurizer Butt Welds</p>	<p>050701323-54, 050701323-55, 050701323-56</p>	<p>Commitments made: 1. SCE will not operate SONGS Unit 2 and 3 after December 31, 2007, until SONGS Unit 2 and 3 are in compliance with the MRP-139 guidance 2. Until the PZR surge line butt weld is successfully brought into compliance with MRP-139, the enhanced leakage monitoring program will be in place.</p>	<p>CLOSED a. Commitments on SONGS Unit 2 have been closed with letter to NRC dated February 8, 2008, "Completion of Actions and Commitments from Confirmatory Action Letter Re: Alloy. 82/182 Pressurizer Butt Welds February 8, 2008" b. Commitments on SONGS Unit 3 have been closed with letter to NRC dated December 24, 2007, "Completion of Actions and Commitments from Confirmatory Action Letter Re: Alloy 82/182 Pressurizer Butt Welds December 24, 2007"</p>
<p>Letter dated July 27, 2007 from SCE to NRC</p>	<p>Response to RAI in support of Request to Revise Fuel Storage Pool Boron Concentrate</p>	<p>020200715-38 020200715-39 020200715-40</p>	<p>SCE will apply a 6.6% reduction to the CECOR Computer code determination of Fuel Assembly Burnup for all fuel assemblies prior to determination of the allowable storage location per the proposed technical specification 4.3.1 and licensee controlled specification 4.0.100.</p>	<p>CLOSED a. Precaution 4.46 and 4.5 and prerequisite 3.3.2 added in SO23-X-7 (revision 15). b. Precaution 4.25 and caution 2.22, and prerequisite (3.3.2) added in SO23-X-7.2 Revision 14) SNM database, revision 21 has been created. c. Commitment captured in TS 4.3.1.g.</p>