

November 13, 2008

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

Subject: **San Onofre Nuclear Generating Station, Unit 2 (SONGS-2)**  
**Docket No. 50-361**  
**License No. NPF-10**  
**Startup Test Activity Reduction (STAR) Summary Report**

REFERENCE: 1. WCAP-16011-P-A, Revision 0, "Startup Test Activity Reduction Program," February 2005  
2. SCE-9801-P-A, Reload Analysis Methodology for the San Onofre Nuclear Generating Station Units 2 and 3 [Reload Topical Report], June 1999

Dear Sir or Madam:

SONGS-2 Cycle 15 achieved initial criticality on January 18, 2008. Following that criticality, Southern California Edison (SCE) applied the methodology presented in the Westinghouse Owner's Group (WOG) Startup Test Activity Reduction (STAR) program (Reference 1) to eliminate Control Element Assembly (CEA) group worth testing from the Low Power Physics Testing (LPPT) program.

Three conditions and limitations were included in the NRC Safety Evaluation (SE) of Reference 1:

1. The STAR program is applicable only to the participating plants as defined in Table 3-1 of the topical report.
2. Should any of the STAR test results fall outside of the test criteria, either ascertain that the safety analysis and STAR applicability requirements are satisfied, or discontinue use of the STAR program for that fuel cycle.
3. Each licensee using STAR is required to submit a summary report following the first application, whether successful or not, of STAR to its plant. The report should (a) identify the core design method used, (b) compare the measured and calculated values and the differences

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between these values to the corresponding core design method uncertainties and (c) show compliance with the STAR applicability requirements. If the application of STAR is unsuccessful, identify the reasons why the STAR application failed.

The purpose of this letter is to show compliance of SONGS to these conditions and limitations.

Condition/Limitation 1 is validated by Table 3-1 of Reference 1, which lists SONGS-2 as a participating plant; therefore, the STAR Program may be applied to the SONGS-2 Cycle 15 reload core.

Condition/Limitation 2 contingency requirements do not apply since all results of the applicable STAR tests were within acceptance criteria. Test results are provided in Attachment 1 of the Enclosure (see below).

Condition/Limitation 3 requirements are met by the Enclosure "SONGS-2 Cycle 15 STAR Implementation Summary Report". The Westinghouse ROCS computer program and Studsvik SIMULATE-3 (SIM-3) computer program were used for the core design and startup physics test prediction of SONGS-2 Cycle 15, consistent with Reference 2. The measured test results for all the required STAR tests in Table 3-3 of Reference 1 were within the test criteria. The differences between the measured and predicted values compared favorably with the associated core design method uncertainties. The STAR applicability requirements were all validated to be met.

SONGS Technical Specification LCO SR 3.1.4.1, "Verify MTC within the upper limit" [prior to entering Mode 1 after each fuel loading], was not changed prior to SONGS-2 Cycle 15 initial criticality; therefore, SR 3.1.4.1 was performed consistent with previous cycles.

SONGS implemented the STAR program in accordance with Reference 1 Appendix G Attachment A, "Implementation of the STAR Program". The application of STAR to SONGS-2 Cycle 15 was successful.

This letter does not contain any NRC commitments. If you have any questions or require additional information, please contact Linda Conklin, 949-368-9443.

Sincerely,



Enclosure: as stated

cc: E. E. Collins, Regional Administrator, NRC Region IV  
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3  
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3