

June 10, 2009

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

**SUBJECT: Docket Nos. 50-361 and 50-362
Amendment Application Numbers 255 and 241
Proposed Change Number NPF-10/15-591
License Amendment Request for Adoption of TSTF-511, Rev. 0,
"Eliminate Working Hour Restrictions from TS 5.2.2 to Support
Compliance with 10 CFR Part 26."
San Onofre Nuclear Generating Station, Units 2 and 3**

Dear Sir or Madam:

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10CFR), Southern California Edison (SCE) is submitting a request for amendments to the Technical Specifications (TS) for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3.

The proposed change consists of Proposed Change Number 591 (PCN-591) and would delete those portions of Technical Specifications (TS) superseded by 10 CFR Part 26, Subpart I. This change is consistent with NRC approved Revision 0 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-511, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26." The existing SONGS Units 2 and 3 TS differ slightly from the current version of the Standard TS (STS). The differences are considered administrative and do not affect the evaluation or conclusion of TSTF-511. The Enclosure provides the text of the STS and the SONGS TS. The availability of this TS improvement was announced in the Federal Register on December 30, 2008 (73 FR 79923) as part of the consolidated line item improvement process (CLIIP).

The Enclosure provides an evaluation of the proposed change. Attachments A and B of the Enclosure provides the existing TS pages. Attachments C and D of the Enclosure provide the existing TS pages marked up to show the proposed change. Attachments E and F of the Enclosure provides the proposed TS changes in final typed format.

This letter contains one regulatory commitment as identified in Attachment G of the Enclosure.

In accordance with 10 CFR 50.91, a copy of this application, with Enclosure, is being provided to the designated California State Official.

If you should have any questions regarding this submittal, please contact Ms. Linda T. Conklin at (949) 368-9443.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/10/2009
Date

A handwritten signature in black ink that reads "Michael P. Stout". The signature is written in a cursive style with a large initial "M" and a stylized "S".

Enclosure: As Stated

cc: E. E Collins, Regional Administrator, NRC Region IV
R. Hall, NRC Project Manager, San Onofre Units 2 and 3
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch

ENCLOSURE

**Description and No Significant Hazards Analysis
for Proposed Change NPF-10/15-591
License Amendment Request for Adoption of TSTF-511, Rev. 0,
“Eliminate Working Hour Restrictions from TS 5.2.2 To
Support Compliance with 10 CFR Part 26”**

San Onofre Nuclear Generating Station Units 2 and 3

**Description and No Significant Hazards Analysis
for Proposed Change NPF-10/15-591
License Amendment Request for Adoption of TSTF-511, Rev. 0,
“Eliminate Working Hour Restrictions from TS 5.2.2 To
Support Compliance with 10 CFR Part 26”**

San Onofre Nuclear Generating Station Units 2 and 3

EXISTING TECHNICAL SPECIFICATIONS

Unit 2: See Attachment A
Unit 3: See Attachment B

PROPOSED TECHNICAL SPECIFICATIONS

(additions circled, strikeout for deletions)

Unit 2: See Attachment C
Unit 3: See Attachment D

PROPOSED TECHNICAL SPECIFICATIONS

(with changes)

Unit 2: See Attachment E
Unit 3: See Attachment F

LIST OF REGULATORY COMMITMENT(S)

See Attachment G

Evaluation of Proposed Change

License Amendment Request for Adoption of TSTF-511, Revision 0, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26."

1.0 Description

2.0 Proposed Change

3.0 Background

4.0 Technical Analysis

5.0 Regulatory Safety Analysis

5.1 No Significant Hazards Determination

5.2 Applicable Regulatory Requirements/Criteria

6.0 Environmental Consideration

7.0 References

1.0 DESCRIPTION

The proposed amendment would delete those portions of Technical Specifications (TS) superseded by 10 CFR 26, Subpart I. This change is consistent with NRC approved Revision 0 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-511, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26." Minor differences between the proposed plant specific TS changes and the changes proposed by TSTF-511 are listed in Section 2.0. The availability of this TS improvement was announced in the Federal Register on December 30, 2008 (73 FR 79923) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 PROPOSED CHANGE

Consistent with the NRC approved Revision 0 of TSTF-511, the proposed TS changes delete those portions of TS superseded by 10 CFR 26, Subpart I.

This application is being made in accordance with the CLIIP. Southern California Edison (SCE) is proposing administrative variations from the TS changes described in TSTF-511, Revision 0. The San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 TS differ slightly from the current version of the Standard TS, NUREG 1432, Revision 3 "Standard Technical Specifications for Combustion Engineering Plants." The differences are considered administrative and do not

affect the conclusion of TSTF-511 or the NRC staff's model safety evaluation (SE) published on December 30, 2008 (73 FR 79923) as part of the CLIP Notice of Availability. The differences in wording are noted below.

NUREG 1432 Rev. 3

The controls shall include guidelines on working hours that ensure adequate shift coverage **shall be** maintained without routine heavy use of overtime.

Any deviation from the **above guidelines** shall be authorized in advance by the **plant manager or the plant manager's designee**, in accordance with **approved administrative** procedures, and with documentation of the basis for granting the deviation.

Routine deviation from the **working hour** guidelines shall not be authorized.

Controls shall be included in the procedures **to require a periodic independent review be conducted** to ensure that excessive hours have not been assigned.

SONGS Units 2 and 3 TS

The controls shall include guidelines on working hours that ensure that adequate shift coverage **is** maintained without routine heavy use of overtime **for individuals**.

Any deviation from the **working hour guidelines** shall be authorized in advance by the **cognizant corporate officer or designees**, in accordance with approved administrative procedures, **or by higher levels of management**, in accordance with **established** procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures **such that individual overtime shall be reviewed monthly by the cognizant corporate officer, or designees**, to ensure that excessive hours have not been assigned.

Routine deviation from the **above guidelines** shall not be authorized.

3.0 BACKGROUND

The NRC issued a Federal Register notice (73 FR 16966, March 31, 2008) of the issuance of a final rule that amended 10 CFR Part 26. The revised regulations in 10 CFR Part 26, Subpart I supersede working hour restrictions contained in paragraph e of TS 5.2.2. The background for this application is adequately addressed by the NRC Notice of Availability published on December 30, 2008 (73 FR 79923).

4.0 TECHNICAL ANALYSIS

SCE has reviewed the SE published on December 30, 2008 (73 FR 79923) as part of the CLIIP Notice of Availability. SCE has concluded that the technical justifications presented in the SE prepared by the NRC staff are applicable to SONGS Units 2 and 3.

10 CFR Part 26, Subpart I, supersedes existing worker fatigue guidance. 10 CFR Part 26, Subpart I, distinguishes between work hour controls and fatigue management and strengthens the requirements for both. Under the new rule, work hour restrictions include not only work hour limitations for rolling 24-hour, 48-hour, and 7-day periods, but also include a required minimum break between work periods and varying required minimum days off. Additionally, Subpart I confines the use of waivers (deviations from restrictions) to situations where overtime is necessary to mitigate or prevent a condition adverse to safety or necessary to maintain the security of the facility. Subpart I also strengthens reporting requirements. Finally, the new rule's work hour control scope includes certain operating and maintenance personnel, as well as individuals directing those operating and maintenance personnel, health physics and chemistry personnel who are a part of the on-site emergency response organization minimum shift complement, the fire brigade member who is responsible for understanding the effects of fire and fire suppressants on safe shutdown capability, and certain security personnel.

The proposed change removes working hour limits imposed in the Technical Specifications in order to support compliance with 10 CFR Part 26, Subpart I. Work hour controls and fatigue management requirements have been incorporated into the NRC's regulations; therefore, it is unnecessary to have work hour control requirements in the Technical Specifications.

Removal of the TS requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I, requirements, even if the TS change is implemented prior to the October 1, 2009 deadline. Along with this License Application Request (LAR), SCE has submitted a commitment to comply with 10 CFR Part 26 concurrently with the implementation of the Technical Specification change.

5.0 REGULATORY SAFETY ANALYSIS

5.1 NO SIGNIFICANT HAZARDS DETERMINATION

Southern California Edison (SCE) has reviewed the no significant hazards determination published on December 30, 2008 (73 FR 79923) as part of the Consolidated Line Item Improvement Process (CLIP) Notice of Availability. SCE has concluded that the determination presented in the notice is applicable to San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. SCE has evaluated the proposed changes to the Technical Specifications using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

Criterion 1: The Proposed Change Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated

The proposed change removes Technical Specification restrictions on working hours for personnel who perform safety related functions. The Technical Specification restrictions are superseded by the worker fatigue requirements in 10 CFR Part 26. Removal of the Technical Specification requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I, requirements. The proposed change does not impact the physical configuration or function of plant structures, systems, or components (SSCs) or the manner in which SSCs are operated, maintained, modified, tested, or inspected. Worker fatigue is not an initiator of any accident previously evaluated. Worker fatigue is not an assumption in the consequence mitigation of any accident previously evaluated.

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2: The Proposed Change Does Not Create the Possibility of a New or Different Kind of Accident From Any Accident Previously Evaluated

The proposed change removes Technical Specification restrictions on working hours for personnel who perform safety related functions. The Technical Specification restrictions are superseded by the worker fatigue requirements in 10 CFR Part 26. Working hours will continue to be controlled in accordance with NRC requirements. The new rule allows for deviations from controls to mitigate or prevent a condition adverse to safety or as necessary to maintain the security of the facility. This ensures that the new rule will not unnecessarily restrict working hours and thereby create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not alter the plant configuration, require new plant equipment to be installed, alter accident analysis assumptions, add any initiators, or effect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3: The Proposed Change Does Not Involve a Significant Reduction in a Margin of Safety

The proposed change removes Technical Specification restrictions on working hours for personnel who perform safety related functions. The Technical Specification restrictions are superseded by the worker fatigue requirements in 10 CFR Part 26. The proposed change does not involve any physical changes to plant or alter the manner in which plant systems are operated, maintained, modified, tested, or inspected. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside the design basis. The proposed change does not adversely affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition.

Removal of plant-specific Technical Specification administrative requirements will not reduce a margin of safety because the requirements in 10 CFR Part 26 are adequate to ensure that worker fatigue is managed.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of “no significant hazards consideration” is justified.

5.2 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

A description of the proposed Technical Specification change and its relationship to applicable regulatory requirements was provided in the NRC Notice of Availability published on December 30, 2008 (73 FR 79923). SCE has reviewed the NRC staff's model SE published on December 30, 2008 (73 FR 79923) as part of the CLIIP Notice of Availability and concluded that the regulatory evaluation section is applicable to SONGS Units 2 and 3.

The proposed change eliminates the plant-specific Technical Specification administrative controls on working hours. The Technical Specification guidance has been superseded by 10 CFR Part 26.

10 CFR Part 26, Subpart I, "Managing Fatigue," contains requirements for managing worker fatigue at operating nuclear power plants.

10 CFR 50.36 provides, among other things, the regulatory requirements for the content in the Administrative Controls section of the Technical Specifications. The inclusion of requirements to control working hours and manage fatigue is not required to be in the Administrative Controls by 10 CFR Part 50.36. Because the requirement to control working hours and manage fatigue is provided in 10 CFR Part 26, Subpart I, it is unnecessary for the Technical Specifications to contain similar controls.

6.0 ENVIRONMENTAL CONSIDERATION

SCE has reviewed the environmental evaluation included in the safety evaluation published on December 30, 2008 (73 FR 79923) as part of the CLIIP Notice of Availability. SCE has concluded that the staff's findings presented in that evaluation are applicable to SONGS Units 2 and 3. The proposed amendment changes recordkeeping, reporting, or administrative procedures. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

7.0 REFERENCES

1. Federal Register Notice, Final Rule 10 CFR Part 26 published on March 31, 2008.
2. TSTF-511, Revision 0, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26."
3. Federal Register Notice, Notice of Availability published on December 30, 2008 (73 FR 79923).

Attachment A
(Existing Pages)
SONGS Unit 2

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

- a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

- b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

- f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.
 - g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.
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Attachment B
(Existing Pages)
SONGS Unit 3

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

- a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

- b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

5.2.2 UNIT STAFF (continued)

(continued)

5.2 Organization (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

- f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.
 - g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.
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Attachment C
(Proposed Pages)
(Redline and Strikeout)
SONGS Unit 2

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

- a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

- b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. ~~Deleted Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.~~

~~Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.~~

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5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

~~Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.~~

- f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.
 - g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.
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Attachment D
(Proposed Pages)
(Redline and Strikeout)
SONGS Unit 3

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

- a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

- b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. ~~Deleted Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.~~

~~Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.~~

5.2.2 UNIT STAFF (continued)

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5.2 Organization (continued)

~~Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.~~

- f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.
 - g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.
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Attachment E
(Proposed Pages)
SONGS Unit 2

5.2 Organization (continued).

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

- a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

- b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. Deleted
- f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

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5.2 Organization (continued)

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Attachment F
(Proposed Pages)
SONGS Unit 3

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

- a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

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- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. Deleted
- f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

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5.2 Organization (continued)

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Attachment G

List of Regulatory Commitment(s)

List of Regulatory Commitment(s)

Removal of the plant-specific Technical Specification requirements will be performed concurrently or subsequent to implementation of the 10 CFR Part 26, Subpart I requirements. This commitment will be completed no later than October 1, 2009 or within 60 days of Technical Specification approval, whichever is later.