

**January 26, 2010**

**Southern California Edison Presentation  
to**

**Nuclear Regulatory Commission**

**San Onofre Nuclear Generation Station (SONGS)  
Technical Specification Upgrade Project**

# Introductions

- NRC Introductions
- Utility Introductions
  - Linda Conklin, Manager of Plant Licensing
  - Tom Raidy, Project Manager for SONGS TS Upgrade
  - Ray Schiele, VP of Projects, Excel Services Corporation
  - Brian Mann, VP of Industry Programs, Excel Services Corporation

# AGENDA

- Introductions
- Project to Update TS to Current Industry Standard, NUREG-1432, Rev. 3+
- Technical Specification Conversion Process
  - Technical Specification Conversion Submittal Content
  - Plans to convert from Unit Specific Technical Specifications (2 separate books) to Combined Technical Specifications (1 book)
  - Submittal Schedule
- NRC Questions and Comments
- Public Participation
- Adjourn

**SONGS**  
**TECHNICAL SPECIFICATION UPGRADE**  
**PROJECT**

**Project to Update TS to Current**  
**Industry Standard, NUREG-1432,**  
**Rev. 3+**

## Project to Update TS to Current Industry Standard, NUREG-1432, Rev. 3 +

- SONGS is a Combustion Engineering, digital I&C plant similar to CE System 80 (Palo Verde)
- SONGS was the first CE plant to adopt the Improved Standard Technical Specifications (TS)
  - SONGS TS developed prior to issuance of NUREG 1432, Rev. 0, which was published in 1992
  - SONGS submitted December 1993
  - NRC approved in February 1996
  - SONGS implemented in August 1996

## Project to Update TS to Current Industry Standard, NUREG-1432, Rev. 3 +

- Since the SONGS conversion, the Industry and the NRC have continued to improve the ISTS
  - Hundreds of Travelers consisting of thousands of individual changes have been approved since original SONGS conversion
    - NUREG 1432 Rev. 1, April 1995
    - NUREG 1432 Rev. 2, April 2001
    - NUREG 1432 Rev. 3, April 2004
    - NUREG 1432 Rev. 4, in Process
- Most beneficial in both safety and cost to update the SONGS TS as a single coordinated project
- Could be a model for other early ITS plants

## Project to Update TS to Current Industry Standard, NUREG-1432, Rev. 3 +

- Update the SONGS Units 2 and 3 Technical Specifications to the current Industry Standard
  - NUREG 1432 Revision 3, Improved Standard Technical Specifications for Combustion Engineering Plants
  - Plus additional approved Technical Specification Task Force (TSTF) Travelers approved prior to submittal

# Project to Update TS to Current Industry Standard, NUREG-1432, Rev. 3+

## Benefits

- Improve consistency between industry standard, peers and SONGS
- Improve format and content
- Aid operators ability to ensure compliance
- Better position SONGS for the future

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**Conversion Process**

# Conversion Process

- SONGS is working with Excel Services to develop a submittal consistent with a Technical Specification Conversion Process used in over 70 ITS conversion
  - More efficient use of both SONGS and NRC resources
    - Utilize current best practices for development, licensing, and implementation
  - Format and content of the change package will be familiar to NRC reviewers
  - Proven process for handling a significant change to the Technical Specifications
    - Including procedures, programs, and training

# Conversion Process

- SONGS plans to convert from unit specific Technical Specifications (2 separate books) to combined Technical Specifications (1 book)
  - Consistent with other plants with shared control rooms and operators
  - Improved human factors
  - Simplifies administrative burden for future License Amendment Requests

# Conversion Process

- Example submittal content
- Improvement on earlier submittals
  - Colors aid internal reviewers in identifying the source of the change
  - May also be beneficial to NRC reviewers
  - Color used in addition to existing descriptions (JFDs, DOCs, etc.)
- Including current TS Bases markups showing retained changes made under the TS Bases Control Program

# Conversion Process

## Schedule

- Excel Services began Package Preparation      January 2010
- Submittal to NRC      September 2010
  - Post Submittal Meeting
    - Package navigation, on-line database, and CE system familiarization
- Requesting NRC Approval      September 2011
- Requesting Implementation Completion      March 2012

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**NRC Questions and Comments**