

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

SONGS
TECHNICAL SPECIFICATION UPGRADE
PROJECT

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

SONGS
TECHNICAL SPECIFICATION UPGRADE
PROJECT

NRC Questions and Comments