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NRC – SONGS
Pre-Submittal Conference
IMPROVED TECHNICAL
SPECIFICATION UPGRADE

March 24, 2011

Agenda

I. Introduction

- Purpose of Meeting NRC, SCE and Excel Services
- NRC, SCE and Excel Services

II. Project Description

- Overview
- Scope
- Phases
 - Initial Planning
 - LAR Development
 - Support of NRC Review and Approval
 - Implementation
- Current TS LAR Status

III. Discussion Topics

- CTS LAR Incorporation
- Licensee Identified Beyond Scope Items
- Accelerated Licensing Review Process
- NRC Resources and 2011 Schedule Support

IV. TS Upgrade Operational Focus

- Current TS
- Upgrade Benefits

V. Summary

I. Introduction

Purpose of Meeting:

Provide an update on our progress regarding the impending submittal of SONGS ITS Upgrade LAR and discuss the review process and schedule

Attendees:

- SONGS
 - Jason Janke, Operations Shift Manager
 - Linda Conklin, Licensing Manager
 - Mark Morgan, SONGS Licensing Technical Leader
 - Rene Vogt-Lowell, TS Implementation Project Manager
- EXCEL Personnel
 - Ray Schiele, Project Manager EXCEL
 - Jerry Jones, EXCEL ITS Specialist

II. Project Description

Overview

- Current TS (CTS) based on pre-Rev 0 NUREG
 - Developed by SCE and EXCEL in parallel with the original NUREG 1432 and were submitted to the NRC before Rev 0 was issued.
 - Licensee Control Specifications (LCS) were created from the specifications removed from the custom TS
- Identified need to bring TS and LCS up to today's standard
- ITS Upgrade: Key Station priority for 2011 and 2012
- Significant Resource Expenditure (CLB, Procedures, Training)
- Key Benefits
 - Improved Safety / Operational Performance
 - Eased Admin Burdens
 - Improved Regulatory Performance
 - Consistency with other sites

II. Project Description (continued)

Scope

- Adopt NUREG 1432 Rev 3.0
- Adopt approved Tech Spec Task Force (TSTF) travelers since Rev 3.0 was issued
- Minimize differences between ISTS and SONGS TS, except where design differences dictate
- Maintain CTS in areas where specific NRC approval was previously granted
- Combine U2 and U3 TS into One Document
- Re-write LCS (Licensee Controlled Specifications) to TRM (Technical Requirements Manual) format using 10CFR50.59

II. Project Description (continued)

Phases

- Initial Planning - complete
- LAR Development – nearly complete
- Support of NRC Review and Approval
- Implementation

II. Project Description (continued)

Phase: LAR Development

Approach

The development of the SONGS ITS Upgrade LAR, followed both the NEI Conversion Guidance Document and the SONGS LAR process.

II. Project Description (continued)

Phase: LAR Development (continued)

Approved Travelers Adopted not in Current NRC Website Electronic File

- TSTF-412 Provide Actions for One Steam Supply to Turbine Driven AFW/EFW Pump Inoperable
- TSTF-422 Change in Technical Specification End State (CE-NPSD-1186)
- TSTF-425 Relocate Surveillance Frequency to License Control Program – RITSTF Initiative 5b
- TSTF-448 Control Room Habitability (already incorporated into CTS)
- TSTF-471 Eliminate use of term CORE ALTERATIONS in ACTIONS and Notes
- TSTF-475 Control Rod Notch testing Frequency and SRM Insert Control Rod Action (affects ITS 1.4 only)
- TSTF-486 Revise MTC Surveillance for Startup Test Activity Reduction (STAR)
- TSTF-487 Relocate DNB parameters to COLR (already incorporated into CTS)

II. Project Description (continued)

Phase: LAR Development (continued)

Approved Travelers Adopted not in Current NRC Website Electronic File

- TSTF-490 Deletion of E-bar Definition and Revision to RCS Specific Activity Tech Spec
- TSTF-491 Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications
- TSTF-493 Clarify Application of Setpoint Methodology for LSSS Functions
- TSTF-497 Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 years or less
- TSTF-501 Relocate Stored Fuel Oil and Lube Oil Volume Values to TRM
- TSTF-511 Eliminate Working Hour Restrictions from TS 5.2.2 to support Compliance with 10 CFR Part 26 (already incorporated into CTS)
- TSTF-513 Leakage Detection System changes (CTS 3.4.15)

II. Project Description (continued)

Phase: LAR Development (continued)

Licensing Package Composition

- Current Tech Spec markup
- Discussion of Changes
- ISTS and ISTS Bases markup
- Justification for Deviation from the ISTS
- No Significant Hazard Consideration
- Any Supporting Information needed

II. Project Description (continued)

Phase: LAR Development (continued)

Reformatting LCS to TRM

- Some SONGS CTS details were relocated to the TRM
- Some LCS details were placed into the SONGS ITS (e.g., IST Program details)
- RIS 2005-20 enhancements (e.g., “functional” vs “operable”)
- Removal of unnecessary Shutdown Requirements (e.g. LCS 3.7.113.1 Appendix R)

II. Project Description (continued)

Current TS LAR Status

Discussion of Possible Enforcement Discretion

- TS upgrade Submittal late April
- TSTF-513 (RCS Leakage Monitoring In Containment) LAR cutoff early May

EGM-09-001

- Ongoing Enforcement Discretion requires submittal of a LAR adopting TSTF-513 within 4 months of Notice of Availability.
- NRC will consider extending the four month period, on a case-by-case basis, with adequate justification from the licensee.
- SONGS CTS differs significantly from the TSTF
- Parallel TSTF-LARs would require redundant effort and review

III. Discussion Topics

1. CTS LAR Approach
2. Licensee Identified Beyond Scope Items
3. Accelerated Licensing Review Process
4. NRC Resources and 2011 Schedule Support

III. Discussion Topics (continued)

1. CTS LAR Incorporation

- Attempted to minimize other LARs during ITS review period
- However, there are several LARs in process at this time

III. Discussion Topics (continued)

License Amendment Requests

<u>LAR Topic</u>	<u>Forecast</u>	<u>Comments</u>
Cyber Security LAR RAI responses	N/A	License change under Review. No Impact to TS
Technical Specification Upgrade Project	4/29/11	Impact to all Sections
RWST Purification Loop	2Q11	No expected impact to TS
AREVA Fuel Test Assembly Permanent Exemption	6/30/11	Impact to Section 4.1
NFPA 805	6/29/11	Impact to License
ECW/CCW 2-Hour Swap Allowance for flow path and AC Power	3Q11	Impact to Section 3.7
New Emergency Room Cooler Specification	3Q11	Impact to Section 3.7
Low Power Recapture LAR	4Q11	Impact to License
Resubmit FHA LAR	TBD	Impact to several subparts of Chapter 3

III. Discussion Topics (continued)

2. Licensee Identified Beyond Scope Items

- CEA Rod Position Specification (from CTS SRs 3.1.5.2 and 3.1.5.4) (Adopted from NUREG 1431)
- Update DC Sources and Battery Parameter Specifications (CTS 3.8.4 and 3.8.6) to delete removed equipment (1260 amp hour batteries) (Admin cleanup)
- Correct Control Room Isolation Signal high radiation setpoint (e.g., Monitor reads in $\mu\text{Ci/cc}$ but CTS in cpm)

III. Discussion Topics (continued)

3. Accelerated Licensing Review Process

Objectives:

- Single supplement prior issuance of the SER
- Reduce licensee cost
- Reduce required NRC resources
- Reduce required amount of formal correspondence

III. Discussion Topics (continued)

4. NRC Resources and 2011 Schedule Support

- NRC Team Lead/Project Manager
- Acceptance review approach (LIC-109 ?)
- NRC Team performing SONGS LAR Reviews
- Familiarity/Navigation orientation will be available on use of Q & A database, as needed
- Development of a project schedule and project milestones

TS Upgrade Operational Focus

Jason Janke
Operations Shift Manager

IV. TS Upgrade Operational Focus

Current TS

- Do not consistently follow the usage rules
Examples:
 - CCW backup N2 in TS 3.7.7
 - CCW seismic makeup in TS 3.7.7.1
- Contain Conflicting Actions
Example:
 - TS 3.6.3 actions, Containment Isolation valves
- Contain lack of guidance or ambiguity in some Tech Specs
Example:
 - New TS 3.0.8 Snubbers
 - New TS 3.7.12 CREATCS

Above issues potentially result in non-conservative/unnecessary unit shutdowns resulting from incorrect calls due to an inconsistently written Tech Spec.

IV. TS Upgrade Operational Focus

(continued)

Upgrade Benefits

Clear, unambiguous and consistent guidance
at all times for on-shift Operators

- Improved Safety
- Improved Operational Performance
- Improved Regulatory Performance
- Improved ability to discuss TS Issues with other plants (currently not practical)
- Upgrade SONGS TS to the current Industry Standards

V. Summary

- SONGS Current TS already in ITS format
- Adopting the latest NUREG 1432 with travelers
- ITS Upgrade LAR Submittal Forecast 4/29/2011
- TSTF-513 Enforcement Discretion Pathway
- Anticipate the same Accelerated Licensing Review Process used for past 5 conversions
- Implementation activities in parallel with NRC review to realize “Upgrade” benefits ASAP

QUESTIONS ?