ATTACHMENT 1

VOLUME 13

SAN ONOFRE NUCLEAR GENERATING STATION

IMPROVED TECHNICAL SPECIFICATIONS CONVERSION

ITS CHAPTER 4.0 DESIGN FEATURES

Attachment 1, Volume 13, Rev. 0, Page 1 of 28

LIST OF ATTACHMENTS

1. ITS 4.0

ATTACHMENT 1

ITS 4.0, DESIGN FEATURES

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

<u>ITS</u>

4.0 4.0 DESIGN FEATURES

- 4.1 4.1 Site
- 4.1.1 4.1.1 <u>Exclusion Area Boundary</u>

The exclusion area boundary shall be as shown in Figure 4.1-1.

4.1.2 4.1.2 Low Population Zone (LPZ)

The LPZ shall be as shown in Figure 4.1-2.

4.2 4.2 Reactor Core

4.2.1 4.2.1 <u>Fuel Assemblies</u>

(

The reactor shall contain 217 fuel assemblies. Each assembly A02 shall consist of a matrix of Zircaloy or ZIRLOTH clad fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO₂) as fuel material. Integral or Discrete Burnable Absorber Rods may be used. They may include: borosilicate glass - Na₂O-B₂O₃-SiO₂ components, boron <u>carbide</u> - B_4C_7 zirconium boride = ZrB₂, gadolinium oxide = Gd₂0₃, erbium or oxide - Er207. Limited substitutions of zirconium alloy (such) ZIRLOTM or Zircaloy) or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

4.2.2 4.2.2 <u>Control Element Assemblies</u>

The reactor core shall contain 83 full length and eight part length control element assemblies (CEAs). The control material shall be silver indium cadmium, boron carbide, and inconel as approved by the NRC.

(continued)

SAN ONOFRE--UNIT 2

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Figure 4.1-1 (page 1 of 1) Exclusion Area Boundary

(continued)

SAN ONOFRE--UNIT 2

4.0-2

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4.0 DESIGN FEATURES (continued)

Figure 4.1-2

<u>ITS</u>



Figure 4.1-2 (page 1 of 1) Low Population Zone

(continued)

SAN ONOFRE--UNIT 2

4.0-3

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4.0 DESIGN FEATURES (continued)

- 4.3.1 4.3.1 <u>Criticality</u>
- 4.3.1.1 4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

4.3.1.1.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;

- 4.3.1.1.c c. K_{eff} ≤ 0.95 if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;
- 4.3.1.1.d d. Three or five Borated stainless steel guide tube inserts (GT-Insert) may be used. When three Borated stainless steel guide tube inserts are used, they will be installed in an assembly's center guide tube, the guide tube associated with the serial number, and the diagonally opposite guide tube. Fuel containing GT-Inserts may be placed in either Region I or Region II. However, credit for GT-Inserts is only taken for Region II storage.

A five-finger CEA may be installed in an assembly. Fuel containing a five-finger CEA may be placed in either Region I or Region II. Credit for inserted 5-finger CEAs is taken for both Region I and Region II.

- 4.3.1.1.e e. A nominal 8.85 inch center to center distance between fuel assemblies placed in Region II;
 - f. A nominal 10.40 inch center to center distance between fuel assemblies placed in Region I;

(continued)

SAN ONOFRE--UNIT 2

4.3.1.1.f

4.0-4

Amendment No. 213

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4.0 DESIGN FEATURES (continued)

4.3.1	4.3.1	<u>Criticality</u>	(conti	nued)	, "Spent Fuel Pool Storage,"	
4.3.1.1.g		g.	Prior to using the storage criteria of LCO 3.7. and LCS 4.0.100, the following uncertainties wi be applied:			
			(1)	The calculated discharge burnup Units 2 and 3 assemblies will 1 6.6%.	p of San Onofre be reduced by	
			(2)	The calculated discharge burnuy Unit 1 fuel assemblies will be 10.0%.	p of San Onofre reduced by	
4.3.1.1.h		h.	Unit "acc unre	s 2 and 3 fuel assemblies with a eptable range" of Figure 3.7.18 stricted storage in Region I;	a burnup in the -1 are allowed	
4.3.1.1.i		i.	Unit "acc unre loca pool	Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-2 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region I;		
4.3.1.1.j		j.	Unit "acc unre	s 2 and 3 fuel assemblies with a eptable range" of Figure 3.7.18 stricted storage in Region II;	a burnup in the -3 are allowed	
4.3.1.1.k		k.	Unit "acc unre loca pool	s 2 and 3 fuel assemblies with a eptable range" of Figure 3.7.18 stricted storage in the periphe tions with 1 or 2 faces toward walls of Region II;	a burnup in the -4 are allowed ral pool the spent fuel	
4.3.1.1.1		1.	Unit "una 3.7. be s Spec	s 2 and 3 fuel assemblies with a cceptable range" of Figure 3.7.1 18-2, Figure 3.7.18-3, and Figure tored in compliance with License ification 4.0.100 Rev. 2, dated	a burnup in the 18-1, Figure re 3.7.18-4 will ee Controlled 09/27/07; and	
4.3.1.1.m		m .	Each stor with Rev.	SONGS 1 uranium dioxide spent : ed in Region II shall be stored Licensee Controlled Specificat: 2, dated 09/27/07.	fuel assembly in accordance ion 4.0.100	

(continued)

SAN ONOFRE--UNIT 2

4.0-4a

Amendment No. 213

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<u>ITS</u>					A01	Design	Features 4.0
	4.0	DESIGN	FEATURES	(cc	ontinued)		
4.3	4.3	Fuel S	torage (conti	nued)		
4.3.1.2			4.3.1.2	The main	new fuel storage racks ar tained with:	e designed and shall	L be
I.3.1.2.a				a.	Fuel assemblies having a of 4.8 weight percent;	maximum U-235 enric	chment
4.3.1.2.b				b.	K _{eff} ≤ 0.95 if fully floor which includes an allowa described in Section 9.1	ded with unborated w nce for uncertaintie of the UFSAR;	ater, es as
4.3.1.2.c				с.	K _{eff} ≤ 0.98 if moderated 1 includes an allowance fo described in Section 9.1	by aqueous foam, whi r uncertainties as of the UFSAR; and	ch
4.3.1.2.d				d.	A minimum 29 inch center fuel assemblies placed i	to center distance n the storage racks.	between
4.3.2		4.3.2	Drainage				
			The spen prevent Specific fuel ass	t fue inadv ation embli	el storage pool is designe rertent draining of the po 3.7.16 value (23 feet ab res seated in the storage	d and shall be maint ol below Technical ove the top of irrad racks) .	ained to
4.3.3		4.3.3	Capacity		plant elevation 50 ft 0	Inches	
			The spen with a s assembli	t fue toraç es.	el storage pool is designe ne capacity limited to no	d and shall be maint more than 1542 fuel	cained

SAN ONOFRE--UNIT 2

Amendment No. 127, 131

A03

<u>ITS</u>

(A01)

4.0 4.0 DESIGN FEATURES

- 4.1 4.1 Site
- 4.1.1 4.1.1 <u>Exclusion Area Boundary</u>

The exclusion area boundary shall be as shown in Figure 4.1-1.

4.1.2 4.1.2 Low Population Zone (LPZ)

The LPZ shall be as shown in Figure 4.1-2.

4.2 4.2 Reactor Core

4.2.1 4.2.1 <u>Fuel Assemblies</u>

The reactor shall contain 217 fuel assemblies. Each assembly A02 shall consist of a matrix of Zircaloy or ZIRLOTH clad fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO₂) as fuel material. Integral or Discrete Burnable Absorber Rods may be used. They may include: borosilicate glass 🎽 Na₂O-B₂O₃-SiO₂ components, boron carbide - B_4C_7 zirconium boride = ZrB₂, gadolinium oxide = Gd₂0₃, erbium or (oxide - Er207. Limited substitutions of zirconium alloy (such) ZIRLOTM or Zircaloy) or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

4.2.2 4.2.2 Control Element Assemblies

The reactor core shall contain 83 full length and eight part length control element assemblies (CEAs). The control material shall be silver indium cadmium, boron carbide, and inconel as approved by the NRC.

(continued)

SAN ONOFRE--UNIT 3

Amendment No. 116,190

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Figure 4.1-1 (page 1 of 1) Exclusion Area Boundary

(continued)

SAN ONOFRE--UNIT 3

4.0-2

Amendment No. 116

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Design Features

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Design Features 4.0

4.0 DESIGN FEATURES (continued)

Figure 4.1-2



Figure 4.1-2 (page 1 of 1) Low Population Zone

(continued)

SAN ONOFRE--UNIT 3

Amendment No. 116

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4.0 DESIGN FEATURES (continued)

4.3 4.3	Fuel	Storage
----------------	------	---------

- 4.3.1 4.3.1 <u>Criticality</u>
- 4.3.1.1 4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:
- 4.3.1.1.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;
- 4.3.1.1.c c. K_{eff} ≤ 0.95 if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;
- 4.3.1.1.d d. Three or five Borated stainless steel guide tube inserts (GT-Insert) may be used. When three Borated stainless steel guide tube inserts are used, they will be installed in an assembly's center guide tube, the guide tube associated with the serial number, and the diagonally opposite guide tube. Fuel containing GT-Inserts may be placed in either Region I or Region II. However, credit for GT-Inserts is only taken for Region II storage.

A five-finger CEA may be installed in an assembly. Fuel containing a five-finger CEA may be placed in either Region I or Region II. Credit for inserted 5-finger CEAs is taken for both Region I and Region II.

- 4.3.1.1.e e. A nominal 8.85 inch center to center distance between fuel assemblies placed in Region II;
 - f. A nominal 10.40 inch center to center distance between fuel assemblies placed in Region I;

(continued)

SAN ONOFRE--UNIT 3

4.3.1.1.f

4.0-4

Amendment No. 205

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A01

4.0 DESIGN FEATURES (continued)

4.3.1	4.3.1	<u>Criticality</u>	(conti	nued)	, "Spent Fuel Pool Storage,"		
4.3.1.1.g		g.	Prio and be a	r to using the storage criteria LCS 4.0.100, the following unce pplied:	of LCO 3.7.18 rtainties will		
			(1)	The calculated discharge burnu Units 2 and 3 assemblies will 6.6%.	p of San Onofre be reduced by		
			(2)	The calculated discharge burnu Unit 1 fuel assemblies will be 10.0%.	p of San Onofre reduced by		
4.3.1.1.h		h.	Unit "acc unre	s 2 and 3 fuel assemblies with eptable range" of Figure 3.7.18 stricted storage in Region I;	a burnup in the -1 are allowed		
4.3.1.1.i		i.	Unit "acc unre loca pool	Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-2 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region I;			
4.3.1.1.j		j.	Unit "acc unre	s 2 and 3 fuel assemblies with eptable range" of Figure 3.7.18 stricted storage in Region II;	a burnup in the -3 are allowed		
4.3.1.1.k		k.	Unit "acc unre loca pool	s 2 and 3 fuel assemblies with eptable range" of Figure 3.7.18 stricted storage in the periphe tions with 1 or 2 faces toward walls of Region II;	a burnup in the -4 are allowed ral pool the spent fuel		
4.3.1.1.1		1.	Unit "una 3.7. be s Spec	s 2 and 3 fuel assemblies with cceptable range" of Figure 3.7. 18-2, Figure 3.7.18-3, and Figu tored in compliance with Licens ification 4.0.100 Rev. 2, dated	a burnup in the 18-1, Figure re 3.7.18-4 will ee Controlled .09/27/07; and		
4.3.1.1.m		m .	Each stor with Rev.	SONGS 1 uranium dioxide spent ed in Region II shall be stored Licensee Controlled Specificat 2, dated 09/27/07.	fuel assembly in accordance ion 4.0.100		

(continued)

SAN ONOFRE--UNIT 3

4.0-4a

Amendment No. 205

Design Features

4.0

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<u>ITS</u>					A01	Design 1	Features 4.0
	4.0	DESIGN	FEATURES	(cc	ontinued)		
4.3	4.3	Fuel S	torage (conti	nued)		
4.3.1.2			4.3.1.2	The main	new fuel storage racks are ontained with:	lesigned and shall	be
4.3.1.2.a				a.	Fuel assemblies having a ma of 4.8 weight percent;	aximum U-235 enrich	hment
4.3.1.2.b				b.	$\kappa_{\rm eff} \leq 0.95$ if fully flooded which includes an allowance described in Section 9.1 of	<pre>with unborated wa for uncertainties the UFSAR;</pre>	ater, s as
4.3.1.2.c				c.	K _{eff} ≤ 0.98 if moderated by includes an allowance for u described in Section 9.1 of	aqueous foam, whic incertainties as the UFSAR; and	ch
4.3.1.2.d				d.	A minimum 29 inch center to fuel assemblies placed in t) center distance k The storage racks.	between
4.3.2		4.3.2	Drainage				
4.3.3		4.3.3	The spen prevent Specific fuel ass Capacity The spen	t fue inadv ation embli t fue	el storage pool is designed a vertent draining of the pool 1 3.7.16 value (23 feet above ces seated in the storage rad plant elevation 56 ft 0 inch el storage pool is designed a	and shall be maintant below Technical the top of irrad. thes the shall be maint.	ained to iated ained
			with a s assembli	toraç es.	ge capacity limited to no mor	e than 1542 fuel	

SAN ONOFRE--UNIT 3

4.0-5

Amendment No. 127, 120

A03

DISCUSSION OF CHANGES ITS 4.0, DESIGN FEATURES

ADMINISTRATIVE CHANGES

A01 In the conversion of the San Onofre Nuclear Generating Station (SONGS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1432, Rev. 3.0, "Standard Technical Specifications Combustion Engineering Plants" (ISTS) and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal.

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A02 CTS 4.2.1 states, in part, each assembly shall consist of a matrix of Zircaloy or Zirlo "clad" fuel rods with an initial composition... ITS 4.2.1 does not contain the word "clad" in the statement. This changes the CTS by deleting the word "clad" when discussing the makeup of the fuel rods.

The purpose of CTS 4.2.1 is to discuss the Fuel Assemblies. The proposed change deletes the word "clad" from the statement, "...Zircaloy or Zirlo clad fuel rods..." This change is acceptable because the fuel assemblies are made of Zircaloy or Zirlo and the word clad is not required. This change clarifies the makeup of the fuel assemblies. This change is classified as administrative because it only clarifies and does not technically change the Technical Specifications.

A03 CTS 4.3.2 states the spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool level below "Technical Specification 3.7.16 value (23 feet above the top of irradiated fuel assemblies seated in the storage racks)." ITS 4.3.2 will replace the words "Technical Specification 3.7.16 value (23 feet above the top of irradiated fuel assemblies seated in the storage racks)" with "elevation 56 ft 0 inches." This changes the CTS by discussing the level, below which drainage of the spent fuel pool is prevented, in plant elevation versus feet above the irradiated fuel.

The purpose of the CTS 4.3.3 is to discuss the drainage of the spent fuel storage pool. The proposed change discusses the lowest level of spent fuel storage pool drainage in plant elevation. This change is acceptable because it only changes the presentation of information. Elevation 56 ft 0 inches is equivalent to 23 feet above the top if irradiated fuel assemblies seated in the storage racks. The change does not technically alter the Technical Specifications because the lowest level, below which drainage is prevented, is not being altered. This change is designated as administrative because it does not technically alter the Technical Specifications.

A04 CTS Figure 4.1-1 shows the Exclusion Area Boundary, and includes a Reservoir, the Unit 1 containment structure, and a Visitors Information Center within the Exclusion Area Boundary. ITS Figure 4.1-1 also shows the Exclusion Area Boundary, but the drawing provided in the ITS has been modified such that the Reservoir is replaced with a Parking Lot, the Unit 1 containment structure is replaced with the ISFSI structure, and the Visitors Information Center is removed.

San Onofre Unit 2 and 3 Page 1 of 2

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DISCUSSION OF CHANGES ITS 4.0, DESIGN FEATURES

CTS Figure 4.1-2 shows the Low Population Zone, and includes the Unit 1 containment structure. ITS Figure 4.1-2 also shows the Low Population Zone, but the drawing provided in the ITS has been modified such that the Unit 1 containment structure is replaced with the ISFSI structure. This changes the CTS by updating the interior layout of certain features of the Exclusion Area Boundary and Low Population Zone.

The purpose of providing the Exclusion Area Boundary in the Technical Specifications is to identify the locations of the possible radioactive release points and to show the dimensions of the boundary and the purpose of the Low Population Zone is to show the dimensions of the zone with respect to the plant. The ITS drawings have been updated to be consistent with the current Exclusion Area Boundary and Low Population Zone drawings in the UFSAR. The proposed changes do not affect the release points, nor the dimensions of the Exclusion Area Boundary or the Low Population Zone, associated with the SONGS Units 2 and 3 operating license. Therefore, since the ITS Figures are consistent with the figures in the UFSAR, this change is acceptable and is designated as administrative.

MORE RESTRICTIVE CHANGES

None

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

None

LESS RESTRICTIVE CHANGES

None

San Onofre Unit 2 and 3

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

<u>U2/U3 CTS</u>

CEOØ STS

San Onofre -- Draft

Rev. 3.0, 03/31/04

Amendment XXX

1

4.1	Site Lo	cation
	[Text d	escription of site location.]
4.2	Reactor	r Core
	4.0.4	Fuel Accomplian
	Element	The reactor shall contain 217 fuel assemblies. Each assembly shall consist of a matrix of Zircalloy or ZIRLO fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO ₂) as fuel material. Limited substitutions of zirconium alloy or stainless steel filler rods for fuel rods, in accordance with INSERT 2 approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.
	4.2.2	Control Rod Assemblies The reactor core shall contain [91] control element assemblies (CEAs). The control material shall be [silver indium cadmium, boron carbide, or hafnium metal]
4.2	Fuel St	
4.3	Fuel Su	brage
	4.3.1	Criticality
		4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:
.a		a. Fuel assemblies having a maximum U-235 enrichment of [4.8] [4.5] weight percent,
		 b. k_{eff} < 0.95 if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1 of the
.b		FSAR,
.b .e		

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4.0-1

² INSERT 1

4.1.1 4.1.1 <u>Exclusion Area Boundary</u>

The exclusion area boundary shall be as shown in Figure 4.1-1.

4.1.2 4.1.2 Low Population Zone (LPZ)

The LPZ shall be as shown in Figure 4.1-2.

1 INSERT 2

4.2.1 Integral or Discrete Burnable Absorber Rods may be used. They may include: borosilicate glass (Na₂O-B₂O₃-SiO₂) components, boron carbide (B₄C), zirconium boride (ZrB₂), gadolinium oxide (Gd₂O₃), or erbium oxide (Er₂O₃).

1) INSERT 3

- 4.3.1.1.c c. $k_{eff} \le 0.95$ if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;
- 4.3.1.1.d d. Three or five borated stainless steel guide tube inserts (GT-Insert) may be used. When three borated stainless steel guide tube inserts are used, they will be installed in an assembly's center guide tube, the guide tube associated with the serial number, and the diagonally opposite guide tube. Fuel containing GT-Inserts may be placed in Region I or Region II. However, credit for GT-Inserts is only taken for Region II storage.

A five-finger CEA may be installed in an assembly. Fuel containing a five-finger CEA may be placed in either Region I or Region II. Credit for inserted 5-finger CEAs is taken for both Region I and Region II.

Insert Page 4.0-1

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2

1

Rev. 3.0, 03/31/04

4.0 DESIGN FEATURES

4.3	4.3	Fuel Storag	ge (continued)	
			 [e. New or partially spent fuel assemblies with a discharge burnup in the "acceptable range" of Figure [3.7.18-1] may be allowed unrestricted storage in [either] fuel storage rack(s), and] [f. New or partially spent fuel assemblies with a discharge burnup in the "unacceptable range" of Figure [3.7.18-1] will be stored in 	2
			compliance with the NRC approved [specific document containing the analytical methods, title, date, or specific configuration or figure].]	
4.3.1.2		4.	3.1.2 The new fuel storage racks are designed and shall be maintained with:	
4.3.1.2.a			a. Fuel assemblies having a maximum U-235 enrichment of	2
4.3.1.2.b			 b. k_{eff} ≤ 0.98 if fully flooded with unborated water, which includes an allowance for uncertainties as described in [Section 9.1 of the U→ FSAR], 	1
4.3.1.2.c			 c. k_{eff} ≤ 0.98 if moderated by aqueous foam, which includes an allowance for uncertainties as described in [Section 9.1 of the FSAR], and 	2
4.3.1.2.d			d. A nominal [10] inch center to center distance between fuel assemblies placed in the storage racks.	
4.3.2		4.3.2 <u>D</u>	rainage	
		T in	he spent fuel storage pool is designed and shall be maintained to prevent advertent draining of the pool below elevation [23ft].	3 2
4.3.3		4.3.3 <u>C</u>	apacity	
		TI Ca	he spent fuel storage pool is designed and shall be maintained with a storage apacity limited to no more than [1542] fuel assemblies.	
	4		INSERTS 5 and 6	1

Amendment XXX

² INSERT 4

- 4.3.1.1.g g. Prior to using the storage criteria of LCO 3.7.18, "Spent Fuel Pool Storage," and LCS 4.0.100, the following uncertainties will be applied:
 - (1) The calculated discharge burnup of San Onofre Units 2 and 3 assemblies will be reduced by 6.6%.
 - (2) The calculated discharge burnup of San Onofre Unit 1 fuel assemblies will be reduced by 10.0%.
- 4.3.1.1.h h. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-1 are allowed unrestricted storage in Region I;
- 4.3.1.1.i i. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-2 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region I;
- 4.3.1.1.j j. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-3 are allowed unrestricted storage in Region II;
- 4.3.1.1.k k. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-4 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region II;
- 4.3.1.1. I. Units 2 and 3 fuel assemblies with a burnup in the "unacceptable range" of Figure 3.7.18-1, Figure 3.7.18-2, Figure 3.7.18-3, and Figure 3.7.18-4 will be stored in compliance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 9/27/07; and
- 4.3.1.1.m m. Each SONGS 1 uranium dioxide spent fuel assembly stored in Region 2 shall be stored in accordance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 9/27/07.

Insert Page 4.0-2a

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1 INSERT 5



Figure 4.1-1 Exclusion Area Boundary

Insert Page 4.0-2b

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1 INSERT 6



Figure 4.1-2

Low Population Zone (LPZ)

Insert Page 4.0-2c

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JUSTIFICATION FOR DEVIATIONS ITS 4.0, DESIGN FEATURES

- 1. Changes are made (additions, deletions, and/or changes) to the ISTS which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.
- 2. The ISTS contains bracketed information and/or values that are generic to all Combustion Engineering vintage plants. The brackets are removed and the proper plant specific information/value is provided. This is acceptable since the information/value is changed to reflect the current licensing basis.
- 3. For clarification, ISTS 4.3.2 was revised by adding "plant" to "elevation" to make "plant elevation."

Specific No Significant Hazards Considerations (NSHCs)

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DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS ITS 4.0, DESIGN FEATURES

There are no specific No Significant Hazards Considerations for this Specification.

San Onofre Unit 2 and 3

Page 1 of 1

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