

**ATTACHMENT 2**

**COMMITMENT LIST**

**AMENDMENT APPLICATIONS 260 AND 246  
SAN ONOFRE NUCLEAR GENERATING STATION UNITS 2 AND 3  
TECHNICAL SPECIFICATIONS CONVERSION TO NUREG-1432, REV. 3.0 PLUS  
SELECTED APPROVED TRAVELERS**

The following list identifies those actions committed to by Southern California Edison (SCE) for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 in this document. Any other actions discussed in the submittal represent intended or planned actions; they are described only for information and are not regulatory commitments. Please contact Ms. Linda T. Conklin at (949) 368-9443 for any questions regarding this document or any associated regulatory commitments.

<b><u>No.</u></b>	<b><u>Commitment</u></b>	<b><u>Due Date/Event</u></b>
1	SCE will establish the Technical Specification Bases for LCO 3.0.4, as modified, with the applicable license amendment.	<b>Upon Implementation</b>
2	SCE will ensure that if LCO 3.0.4.b is used, the risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."	<b>Upon Implementation</b>
3	SCE will establish the Technical Specification Bases for LCO 3.0.8, as adopted, with the applicable license amendment.	<b>Upon Implementation</b>
4	SCE will ensure that when LCO 3.0.8a is used, appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restriction: <ul style="list-style-type: none"> <li>At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s),</li> </ul>	<b>Upon Implementation</b>

<u>No.</u>	<u>Commitment</u>	<u>Due Date/Event</u>
	must be available	
5	<p>SCE will ensure that when LCO 3.0.8b is used, appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restriction:</p> <ul style="list-style-type: none"> <li>At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling (e.g., F&amp;B, firewater system or "aggressive secondary cooldown" using the steam generators) must be available.</li> </ul>	<b>Upon Implementation</b>
6	<p>SCE will ensure that when LCO 3.0.8 is used appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restriction:</p> <ul style="list-style-type: none"> <li>Every time the provisions of LCO 3.0.8 are used SCE will confirm that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8 does not apply to non-seismic snubbers. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restrictions, and the associated plant configuration shall be available on a recoverable basis.</li> </ul>	<b>Upon Implementation</b>
7	SCE will revise the UFSAR or TS Bases to describe the restrictions in commitments 4 and 5.	<b>In Accordance with 10CFR50.71(e)</b>
8	SCE will ensure that when using end state changes being adopted as part of TSTF-422 incorporation, appropriate plant procedures and administrative controls are revised to perform a	<b>Upon Implementation</b>

<u>No.</u>	<u>Commitment</u>	<u>Due Date/Event</u>
	<p>risk assessment in accordance with 10 CFR 50.65(a)(4), regardless of whether maintenance is being performed. The risk assessment will follow Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," which endorses NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Section 11 guidance for implementation of 10 CFR 50.65(a)(4). SCE will also follow the industry-developed implementation guidance, WCAP-16364-NP, Rev. 0, "Implementation Guidance for Risk Informed Modification to Selected Required Action End States at Combustion Engineering NSSS Plants (TSTF-422)," November 2004.</p>	
9	<p>For all Frequencies being moved to the Surveillance Frequency Control Program, SCE will ensure both the current Frequencies and the basis for the Frequencies are included in the Program. SCE will also ensure that any changes to the Frequencies will be in accordance with NEI 04-01, "Risk-Informed Method for Control of Surveillance Frequencies," Rev. 1.</p>	<p><b>Upon Implementation</b></p>
10	<p>SCE will ensure that appropriate administrative procedures are in place when using the LCO 3.9.3 Note that allows penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere to be unisolated under administrative controls. The administrative procedures will ensure that in the event of a refueling accident, the open penetration(s) can and will be promptly closed.</p>	<p><b>Upon Implementation</b></p>

11	SCE will ensure procedures are in place to require the continuing performance of the Hazardous Cargo Traffic Report in accordance with Regulatory Guide 1.78, "Evaluating the Habitability of Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release." The report will include hazardous cargo traffic on Interstate 5 and the Atchison, Topeka, and Santa Fe Railway and be submitted to the NRC regional administrator every three years.	<b>Upon Implementation</b>
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