

From: Hall, Randy
Sent: Wednesday, December 21, 2011 2:33 PM
To: Linda.Conklin@sce.com
Cc: Mark.Morgan@sce.com
Subject: NRC Acceptance Review for San Onofre Units 2 and 3, License Amendment and Exemption Requests for Permanent Use of AREVA Fuel (TAC Nos. ME6820 - ME6823)

December 21, 2011

Linda Conklin
Manager, Nuclear Licensing
San Onofre Nuclear Generating Station
Southern California Edison

Linda,

By letter dated July 29, 2011, Southern California Edison (the licensee) submitted a license amendment request (LAR) and an exemption request for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The LAR requested approval to revise a number of Technical Specification (TS) requirements, to allow the licensee to use the AREVA 16x16 reactor fuel on a permanent basis at SONGS, Units 2 and 3. These changes include revising TS 5.7.1.5, Core Operating Limits Report (COLR), to update the methodology reference list to support the core design with the new AREVA fuel; revising TS 4.2.1, Fuel Assemblies, to include the description of the new fuel cladding material (M5); revising TS 2.1.1.2, Reactor Safety Limits, to identify a fuel centerline melt safety limit for the AREVA fuel with corresponding adjustments made to account for the burnable absorber fuel rods; and incorporating fuel burnup limits consistent with AREVA M5 clad fuel assemblies into the SONGS licensing basis.

The exemption request seeks a permanent exemption from the requirements of Section 50.46 of Title 10 of the *Code of Federal Regulations* (10 CFR) and 10 CFR Part 50, Appendix K, to allow the use of the AREVA M5 cladding material, as these regulations currently limit acceptable fuel cladding material to Zircaloy and ZIRLO™.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this license amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with 10 CFR 50.90, an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations. Consistent with 10 CFR 50.12, the Commission may grant exemptions to the requirements of the regulations of this part, which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. The

Commission will not consider granting an exemption under this part unless special circumstances are present. Special circumstances may include, among other things, that the application of the regulation in the particular circumstances would not serve the underlying purpose of the rule, or is not necessary to achieve the underlying purpose of the rule.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the staff to proceed with its detailed technical review and to make an independent assessment regarding the acceptability of the proposed amendment and exemption requests in terms of regulatory requirements and the protection of public health and safety, security, and the environment. If additional information is needed for the staff to complete its technical review, you will be advised by separate correspondence.

If you have any questions, please contact me at (301) 415-4032

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