

**BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
SOUTHERN CALIFORNIA EDISON COMPANY)	Docket Nos.
(San Onofre Nuclear Generating Station))	San Onofre 50-361 and 50-362-LA
)	December 2, 2012
)	

**ADDENDUM TO CITIZENS OVERSIGHT'S ANSWER TO SUBMISSIONS BY NRC
STAFF AND SOUTHERN CALIFORNIA EDISON OPPOSING THE PETITION TO
INTERVENE AND REQUEST FOR A HEARING BY CITIZENS OVERSIGHT.**

The following table "EXHIBIT A" is an extraction from the proposed changes to the San Onofre License Technical Specifications regarding the Reactor Cooling System (RCS). This is a direct extraction from Attachment 1 Vol 7, Chapter 3.4 "Reactor Coolant System (RCS)" - (ADAMS accession number ML11251A100). There are no arguments or statements by Citizens' Oversight in this addendum.

In this table, the licensee proposes that the Surveillance Frequency specification is to be replaced with the phrase "According to the Surveillance Frequency Control Program." There are approximately 53 instances of specifications being relocated in this single attachment of the Technical Specifications, and there are a total of 15 such attachments.

Citizens' Oversight will refer to this table in the scheduled Oral Arguments proceeding of December 5, 2012.

This concludes the introductory remarks about this addendum.

EXHIBIT A - TABLE OF CHANGES TO THE RCS TECHNICAL SPECIFICATIONS

Page	Desig	Desc	Surveillance Frequency	Comment
6, 9	3.4.1.1	Verify pressurizer pressure is within the limits specified in the COLR.	12 hours	
6, 9	3.4.1.2	Verify RCS cold leg temperature is within the limits specified in the COLR.	12 hours	
7, 10	3.4.1.3	Verify RCS total flow rate is greater than or equal to the limits specified in the COLR.	12 hours	also deletes phrase stating check performed in Mode 1.
31, 32	3.4.2.1	Verify RCS Tc in each loop \geq 522 degrees F.	30 minutes	
39	3.4.2.1	Verify RCS Tc in each loop \geq 522 degrees F.	12 hours	
		-----NOTE----- Only required to be performed during RCS heatup and cooldown operations and RCS inservice leak and hydrostatic testing. -----		
51, 59, 72	3.4.3.1	Verify RCS pressure, RCS temperature, and RCS heatup and cooldown rates within limits specified in the PTLR.	30 minutes	
	3.4.3.2			Removed requirement to check irradiation specimen
88, 89, 95	3.4.4.1	Verify each RCS loop is in operation.	12 hours	
108, 111, 121	3.4.5.1	Verify RCS loop is in operation.	12 hours	
108, 111, 121	3.4.5.2	Verify secondary side water level in each steam generator \geq 50%	12 hours	
108, 111, 121	3.4.5.3	Verify correct breaker alignment and indicated power available to each required pump (that is not in operation)	7 days	
138, 143, 155	3.4.6.1	Verify required RCS loop or SDC train is in operation.	12 hours	
138, 143, 155	3.4.6.2	Verify secondary side water level in required SG(s) is \geq 50%	12 hours	
		-----NOTE----- Not required to be performed until 24 hours after a required pump is not in operation. -----		
138, 143, 155	3.4.6.3	Verify correct breaker alignment and indicated power available to each required pump.	7 days	
174, 179, 192	3.4.7.1	Verify required SDC train is in operation	12 hours	

174, 179, 192	3.4.7.2	Verify required SG secondary side water level is > 50%	12 hours	
		-----NOTE----- Not required to be performed until 24 hours after a required pump is not in operation. -----		
174, 179, 192	3.4.7.3	Verify correct breaker alignment and indicated power available to each required SDC pump.	7 days	
208, 211, 221	3.4.8.1	Verify required SDC train is in operation	12 hours	
		-----NOTE----- Not required to be performed until 24 hours after a required pump is not in operation. -----		
208, 211, 221	3.4.8.2	Verify correct breaker alignment and indicated power available to required SDC pump (that is not in operation)	7 days	
234, 236, 244	3.4.9.1	Verify pressurizer water level <= 57%.	12 hours	
234, 236	3.4.9.2	Verify capacity of each group of pressurizer heaters >= 150 kW	92 days	
244	3.4.9.2	Verify capacity of each group of pressurizer heaters >= 150 kW	18 months	differs from other sections
262, 266	3.4.12.2.1	Verify that the SDCS Relief Valve isolation valves 2HV9337, 2HV9339, 2HV9377, and 2HV9378 are open.	72 hours	
262, 266	3.4.12.2.2	Verify relief valve setpoint		In accordance with the Inservice Testing Program (no constraints)
262, 266	3.4.10.1 or 3.4.10.3	Verify each pressurizer safety valve is OPERABLE in accordance with inservice testing program. Following testing, asfound lift settings shall be within +3% or -2%. However, pressurizer safety valves shall be set to within ±1% of the specified setpoint.		In accordance with the Inservice Testing Program (no constraints)
297, 302, 318	3.4.12.1. 1	Verify a maximum of two HPSI pumps are capable of injecting into the RCS.	12 hours	
297, 302, 318	3.4.12.1. 2	Verify each SIT is isolated	12 hours	

297, 302, 318	3.4.12.1.3	Verify RCS vent \geq 5.6 square inches is open	12 hours for unlocked open vent valve(s) AND 31 days for locked, sealed, or otherwise secured open vent valve(s), or open flanged RCS penetrations	
297, 302, 318	3.4.12.1.4	Verify the OPERABLE SDCS Relief Valve isolation valve pair (valve pair 2HV9337 and 2HV9339, or valve pair 2HV9377 and 2HV9378) is in the power-lock open condition.	12 hours	Not proposed moved to SFCP
297, 302, 318	3.4.12.1.5	Verify that SDCS Relief Valve isolation valves 2HV9337, 2HV9339, 2HV9377, and 2HV9378 are open	72 hours	
297, 302, 318	3.4.12.1.6	Verify required SDCS System relief valve Setpoint is within limits.		In accordance with the Inservice Testing Program
336-340	3.4.12.1 & 3.4.2	To minimize the potential for a low temperature overpressure event by limiting the mass input capability, not more than two HPSI pumps are verified OPERABLE with the other pump locked out with power removed and the SIT discharge incapable of injecting into the RCS. The HPSI pump is rendered incapable of injecting into the RCS through removing the power from the pump by racking the breakers out under administrative control. An alternate method of LTOP control may be employed using at least two independent means to prevent a pump start such that a single failure or single action will not result in an injection into the RCS. This may be accomplished through the pump control switch being placed in pull to lock and at least one valve in the discharge flow path being closed	12 hours	

336-340	3.4.12.3	requires verifying that the required RCS vent is open \geq [1.3] square inches is proven OPERABLE by verifying its open condition or the valve is locked closed and power is removed. Additionally, the SIT discharge isolation valves are verified closed and deactivated	See below	
		a. Once every 12 hours for a valve that is unlocked open (valves that are sealed or secured in the open position are considered "locked" in this context) or b. Once every 31 days for other vent path(s) (e.g., a vent valve that is locked, sealed, or secured in position, a removed pressurizer safety valve, or open manway).		
336-340	3.4.12.4	This SR verifies the valves are open to confirm the flow paths.	see above	
336-340	3.4.12.5	The SDC System relief valve setpoint is verified periodically to be within limits	72 hours	
347, 349, 357	3.4.13.1	Not required to be performed in MODE 3 or 4 until 12 hours of steady state operation. Not applicable to primary to secondary LEAKAGE. Verify RCS operational LEAKAGE is within limits by performance of RCS.	72 hours	page 360 has a description of leakage, page 443 says this SR is performed at increased frequency of 24 and 12 hours. There is no note about move to SFCP.
347, 349, 357	3.4.13.2	-----NOTE----- Not required to be performed until 12 hours after establishment of steady state operation. ----- Verify primary to secondary LEAKAGE is < 150 gallons per day through any one SG.	72 hours	

		<p>-----NOTES-----</p> <p>1. Not required to be performed in MODES 3 and 4.</p> <p>2. Not required to be performed on the RCS PIVs located in the SDC flow path when in the shutdown cooling mode of operation.</p> <p>3. RCS PIVs actuated during the performance of this Surveillance are not required to be tested more than once if a repetitive testing loop cannot be avoided.</p> <p>-----</p> <p>Verify leakage from each RCS PIV specified in Table 3.4.14-1 is equivalent to # 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure \$ 2215 psia and # 2255 psia.</p>	In accordance with the Inservice Testing Program or 24 months AND Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months AND Within 48 hours following valve actuation due to automatic or manual action or flow through the valve for valves	
377, 385, 399	3.4.14.1			
377, 385, 399	3.4.14.2	Verify SDC System interlock function prevents the valves from being opened with a simulated or actual RCS pressure signal $\frac{24}{12}$ 380 psia	18 months	
407	3.4.14.1	[PIV Valve]	9 to 18 months	
409	3.4.14.2	[SDC Interlocks]	18 months	
420, 425, 437	3.4.15.1	Perform CHANNEL CHECK of the required containment atmosphere gaseous radioactivity monitor.	12 hours	
420, 425, 437	3.4.15.2	Perform CHANNEL CHECK of the required containment atmosphere particulate radioactivity monitor.	12 hours	
420, 425, 437	3.4.15.3	Perform CHANNEL FUNCTIONAL TEST of the required containment atmosphere gaseous radioactivity monitor.	92 days	

420, 425, 437	3.4.15.4	Perform CHANNEL FUNCTIONAL TEST of the required containment atmosphere particulate radioactivity monitor.	92 days	
420, 425, 437	3.4.15.5	Perform CHANNEL CALIBRATION of the required containment sump monitor.	24 months	
420, 425, 437	3.4.15.6	Perform CHANNEL CALIBRATION of the required containment atmosphere gaseous radioactivity monitor.	24 months	
420, 425, 437	3.4.15.7	Perform CHANNEL CALIBRATION of the required containment atmosphere particulate radioactivity monitor.	24 months	
458, 463, 476	3.4.16.1	Verify reactor coolant DOSE EQUIVALENT XE-133 specific activity ≤ 500 mCi/gm.	7 days	
458, 463, 476	3.4.16.2	Verify reactor coolant DOSE EQUIVALENT I-131 specific activity # $1.0 \mu\text{Ci/gm}$.	14 days (+ text)	

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Units 2 and 3))

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document "**ADDENDUM TO CITIZENS OVERSIGHT'S ANSWER TO SUBMISSIONS BY NRC STAFF AND SOUTHERN CALIFORNIA EDISON OPPOSING THE PETITION TO INTERVENE AND REQUEST FOR A HEARING BY CITIZENS OVERSIGHT**" have been served upon the parties by the Electronic Information Exchange.

Respectfully submitted,

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