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San Onofre Nuclear Generating Station

10 CFR 50.90

April 9, 2013

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: **Docket No. 50-361**
Supplement 1 to Amendment Application Number 263
Steam Generator Program
San Onofre Nuclear Generating Station, Unit 2

Reference: Letter from Mr. Peter T. Dietrich (SCE) to NRC dated April 5, 2013, Docket No. 50-361, Amendment Application Number 263 Steam Generator Program, San Onofre Nuclear Generating Station, Unit 2

Dear Sir or Madam:

Southern California Edison (SCE) submitted Amendment Application No. 263 to Docket No. 50-361 (Reference). The Enclosure provides supplemental information on the Technical Specification impact assessment for SONGS Unit 2 operation at 70% Rated Thermal Power in support of the referenced Amendment Application. This supplement does not change the conclusions reached in the No Significant Hazards Consideration section of the Amendment Application and therefore, the No Significant Hazards Consideration is still applicable.

Should you have any questions, or require additional information, please contact Mr. Mark Morgan, Licensing Lead, at (949) 368-6745.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/9/2013
(Date)

Sincerely,

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Enclosure: Technical Specification Impact Assessment for SONGS Unit 2 Operation at 70% Power

cc: A. T. Howell III, Regional Administrator, NRC Region IV
R. Hall, NRC Project Manager, SONGS Units 2 and 3
B. Benney, NRC Project Manager, SONGS Units 2 and 3
G. G. Warnick, NRC Senior Resident Inspector, SONGS Units 2 and 3
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch

ENCLOSURE

Technical Specification Impact Assessment for

SONGS Unit 2 Operation at 70% Power

TECHNICAL SPECIFICATION IMPACT ASSESSMENT FOR OPERATION AT 70% POWER			
SONGS Unit 2 Tech. Spec.	**Description**	**TS LCO, Applicability, Actions, & Surveillance Requirements Impact**	**TS Change Required ?**
NOTES: (1) Power dependency is defined as the Technical Specification LCO, Applicability, Action Statement, or Surveillance Requirement containing a reference to a specific power level or a requirement that is power dependent. References solely to MODE 1 or MODE 2 are not considered power dependent.			
1.1	DEFINITION	Power level dependent. Definitions for Rated Thermal Power and Modes (Table 1.1-1) are not affected by reduced power operation.	No
1.2	LOGICAL CONNECTORS	Not power level dependent.	No
1.3	COMPLETION TIME	Not power level dependent.	No
1.4	FREQUENCY	Not power level dependent.	No
2.0	SAFETY LIMITS	Not power level dependent.	No
3.0	LCO AND SR APPLICABILITY	Not power level dependent.	No
3.1.1	SHUTDOWN MARGIN (SDM) - TAVG > 200 DEGF	Not power level dependent; applicable only to Modes 3 and 4.	No
3.1.2	SHUTDOWN MARGIN (SDM) - TAVG ≤ 200 DEGF	Not power level dependent; applicable only to Mode 5.	No
3.1.3	REACTIVITY BALANCE	Not power level dependent. Surveillance Requirement is addressed in RAI 11 (Table 2).	No
3.1.4	MODERATOR TEMPERATURE COEFFICIENT (MTC)	Power level dependent. MTC limits are analyzed as part of the reload analyses. Operation at 70% power does not impact the LCO, Applicability, or Actions. Surveillance Requirements are addressed in RAI 11 (Table 2).	No
3.1.5	CONTROL ELEMENT ASSEMBLY (CEA) ALIGNMENT	Power level dependent. The CEA alignment LCO and Surveillance Requirements are independent of power. Required actions as per the COLR are to reduce power after CEA deviation for initial power greater than 50% power. Operation at 70% power does not impact required actions.	No
3.1.6	SHUTDOWN CONTROL ELEMENT ASSEMBLY (CEA) INSERTION LIMITS	Not power level dependent. The shutdown CEAs are withdrawn from the core at power. No distinction is made between power levels in Mode 1.	No

TECHNICAL SPECIFICATION IMPACT ASSESSMENT FOR OPERATION AT 70% POWER			
SONGS Unit 2 Tech. Spec.	**Description**	**TS LCO, Applicability, Actions, & Surveillance Requirements Impact**	**TS Change Required ?**
3.1.7	REGULATING CEA INSERTION LIMITS	Power level dependent. The LCO is dependent on power because the CEA insertion COLR requirements are power dependent. The CEA insertion limit Surveillance Requirements remain valid for operation at 70% power. Power dependent insertion limits (PDIL) are validated in reload analysis.	No
3.1.8	PART LENGTH CONTROL ELEMENT ASSEMBLY (CEA) INSERTION LIMITS	Power level dependent. The LCO is dependent on power because the part length CEA insertion COLR requirements are power dependent. The part length CEA insertion limit Surveillance Requirements remain valid for operation at 70% power. Power dependent insertion limits (PDIL) are validated in reload analysis.	No
3.1.9	BORATION SYSTEMS - OPERATING	Not power level dependent; requirements are the same for all power levels.	No
3.1.10	BORATION SYSTEMS - SHUTDOWN	Not power level dependent; applicable only to Modes 5 and 6.	No
3.1.11	Not Used	N/A	No
3.1.12	SPECIAL TEST EXCEPTION - LOW POWER PHYSICS TESTING	Not power level dependent; applicable only to Modes 2 and 3.	No
3.1.13	SPECIAL TEST EXCEPTION - AT POWER PHYSICS TESTING	Power level dependent. The listed LCOs may be suspended provided thermal power is < 85% and linear heat rate does not exceed the limit in the COLR. Operation at 70% power does not impact the LCO, Applicability, Actions or Surveillance Requirements.	No
3.1.14	SPECIAL TEST EXCEPTION - REACTIVITY COEFFICIENT TESTING	Power level dependent. The listed LCOs may be suspended provided certain CEA criteria, and LHR and DNBR do not exceed COLR limits. Operation at 70% power does not impact compliance with this specification.	No
3.2.1	LINEAR HEAT RATE (LHR)	Power level dependent. LHR limit is validated in reload analysis. Operation at 70% power does not impact compliance with this specification.	No
3.2.2	PLANAR RADIAL PEAKING FACTORS (Fxy)	Power level dependent. Operation at 70% power does not impact the LCO, Applicability, or Actions. Surveillance Requirement is addressed in RAI 11 (Table 2).	No
3.2.3	AZIMUTHAL POWER TILT (Tq)	Power level dependent. Operation at 70% power does not impact the LCO, Applicability, Actions or Surveillance Requirements. Surveillance Requirement 3.2.3.3 is addressed in RAI 11 (Table 2).	No

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SONGS Unit 2 Tech. Spec.	**Description**	**TS LCO, Applicability, Actions, & Surveillance Requirements Impact**	**TS Change Required ?**
3.2.4	DEPARTURE FROM NUCLEATE BOILING RATIO (DNBR)	Power level dependent. Four methods are specified for maintaining DNBR. A power dependency is specified in the COLR. Operation at 70% power does not impact the LCO, Applicability, Actions or Surveillance Requirements. Operation at 70% power does not change the requirements of the COLR.	No
3.2.5	AXIAL SHAPE INDEX (ASI)	Power level dependent. Operation at 70% power does not impact the LCO, Applicability, Actions or Surveillance Requirements. Operation at 70% power does not change the requirements of the COLR.	No
3.3.1	REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING	Power level dependent. RPS trip setpoints are validated in reload analysis. Operation at 70% power does not impact the LCO, Applicability, Actions or Surveillance Requirements. Surveillance Requirements 3.3.1.2, 3.3.1.5 and 3.3.1.11 are addressed in RAI 11 (Table 2).	No
3.3.2	REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - SHUTDOWN	Not power level dependent; applicable only to Modes 3, 4 and 5.	No
3.3.3	CONTROL ELEMENT ASSEMBLY CALCULATORS	Not power level dependent; requirements are the same for all power levels.	No
3.3.4	REACTOR PROTECTIVE SYSTEM (RPS) LOGIC AND TRIP INITIAION	Not power level dependent; requirements are the same for all power levels.	No
3.3.5	ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION	Not power level dependent; requirements are the same for all power levels.	No
3.3.6	ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) LOGIC AND MANUAL TRIP	Not power level dependent; requirements are the same for all power levels.	No
3.3.7	DIESEL GENERATOR (DG) - UNDERVOLTAGE START	Not power level dependent; requirements are the same for all power levels.	No
3.3.8	CONTAINMENT PURGE ISOLATION SIGNAL (CPIS)	Not power level dependent; requirements are the same for all power levels.	No

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SONGS Unit 2 Tech. Spec.	**Description**	**TS LCO, Applicability, Actions, & Surveillance Requirements Impact**	**TS Change Required ?**
3.3.9	CONTROL ROOM ISOLATION SIGNAL (CRIS)	Not power level dependent; requirements are the same for all power levels.	No
3.3.10	Not Used	N/A	No
3.3.11	POST ACCIDENT MONITORING (PAM) INSTRUMENTATION	Not power level dependent; requirements are the same for all power levels.	No
3.3.12	REMOTE SHUTDOWN SYSTEM	Not power level dependent; requirements are the same for all power levels.	No
3.3.13	SOURCE RANGE MONITORING CHANNELS	Not power level dependent; applicable only to Modes 3, 4 and 5.	No
3.4.1	RCS DNB PRESSURE, TEMPERATURE AND FLOW LIMITS	Power level dependent. Power dependency is as specified in the COLR. RCS operating limits are analyzed as part of the reload analyses. RCS flow limit is addressed in RAI 12. Operation at 70% power does not impact the LCO, Applicability, Actions or Surveillance Requirements. Operation at 70% power does not change the requirements of the COLR.	No
3.4.2	RCS MINIMUM TEMPERATURE FOR CRITICALITY	Power level dependent. Operation at 70% power does not impact the LCO, Applicability, Actions or Surveillance Requirements.	No
3.4.3	RCS PRESSURE AND TEMPERATURE (P/T) LIMITS	Not power level dependent; requirements are the same for all power levels.	No
3.4.3.1	PRESSURIZER HEATUP AND COOLDOWN LIMITS	Not power level dependent; requirements are the same for all power levels.	No
3.4.4	RCS LOOPS - MODES 1 AND 2	Not power level dependent; requirements are the same for all power levels.	No
3.4.5	RCS LOOPS - MODES 3	Not power level dependent; applicable only to Mode 3.	No
3.4.6	RCS LOOPS - MODES 4	Not power level dependent; applicable only to Mode 4.	No
3.4.7	RCS LOOPS - MODES 5, LOOPS FILLED	Not power level dependent; applicable only to Mode 5.	No
3.4.8	RCS LOOPS - MODES 5, LOOPS NOT FILLED	Not power level dependent; applicable only to Mode 5.	No
3.4.9	PRESSURIZER	Not power level dependent; requirements are the same for all power levels.	No
3.4.10	PRESSURIZER SAFETY VALVES	Not power level dependent; requirements are the same for all power levels.	No
3.4.11	Not used	N/A	No

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SONGS Unit 2 Tech. Spec.	**Description**	**TS LCO, Applicability, Actions, & Surveillance Requirements Impact**	**TS Change Required ?**
3.4.12.1	LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM RCS TEMPERATURE <= PTLR LIMIT	Not power level dependent; applicable only to Modes 4, 5, and 6.	No
3.4.12.2	LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM RCS TEMPERATURE > PTLR LIMIT	Not power level dependent; applicable only to Mode 4.	No
3.4.13	RCS OPERATIONAL LEAKAGE	Not power level dependent; requirements are the same for all power levels.	No
3.4.14	RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE	Not power level dependent; requirements are the same for all power levels.	No
3.4.15	RCS LEAKAGE DETECTION INSTRUMENTATION	Not power level dependent; requirements are the same for all power levels.	No
3.4.16	RCS SPECIFIC ACTIVITY	Power level dependent. Action A.1 and Figure 3.4.16-1 are addressed in RAI 11. Operation at 70% power does not impact the LCO, Applicability, remaining Actions, or Surveillance Requirements.	No
3.4.17	STEAM GENERATOR (SG) TUBE INTEGRITY	Not power level dependent; requirements are the same for all power levels.	No
3.5.1	SAFETY INJECTION TANKS (SITs)	Not power level dependent; requirements are the same for all power levels.	No
3.5.2	ECCS - OPERATING	Not power level dependent; requirements are the same for all power levels.	No
3.5.3	ECCS - SHUTDOWN	Not power level dependent; applicable only to Modes 3 and 4.	No
3.5.4	REFUELING WATER TANK (RWT)	Not power level dependent; requirements are the same for all power levels.	No
3.5.5	TRISODIUM PHOSPHATE (TSP)	Not power level dependent; requirements are the same for all power levels.	No
3.6.1	CONTAINMENT	Not power level dependent; requirements are the same for all power levels.	No
3.6.2	CONTAINMENT AIR LOCKS	Not power level dependent; requirements are the same for all power levels.	No
3.6.3	CONTAINMENT ISOLATION VALVES	Not power level dependent; requirements are the same for all power levels.	No
3.6.4	CONTAINMENT PRESSURE	Not power level dependent; requirements are the same for all power levels.	No

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SONGS Unit 2 Tech. Spec.	**Description**	**TS LCO, Applicability, Actions, & Surveillance Requirements Impact**	**TS Change Required ?**
3.6.5	CONTAINMENT AIR TEMPERATURE	Not power level dependent; requirements are the same for all power levels.	No
3.6.6.1	CONTAINMENT SPRAY AND COOLING SYSTEMS	Not power level dependent; requirements are the same for all power levels.	No
3.6.6.2	CONTAINMENT COOLING SYSTEM	Not power level dependent; applicable only to Mode 4.	No
3.6.7	Not Used	N/A	No
3.6.8	CONTAINMENT DOME AIR CIRCULATORS	Not power level dependent; requirements are the same for all power levels.	No
3.7.1	MAIN STEAM SAFETY VALVES (MSSVs)	Power level dependent. Table 3.7.1-1 is validated as part of the reload analyses. Operation at 70% power does not impact the LCO, Applicability, Actions, or Surveillance Requirements.	No
3.7.2	MAIN STEAM ISOLATION VALVES (MSIVs)	Not power level dependent; requirements are the same for all power levels.	No
3.7.3	MAIN FEEDWATER ISOLATION VALVES (MFIVs)	Not power level dependent; requirements are the same for all power levels.	No
3.7.4	ATMOSPHERIC DUMP VALVES (ADVs)	Not power level dependent; requirements are the same for all power levels.	No
3.7.5	AUXILIARY FEEDWATER (AFW) SYSTEM	Not power level dependent; requirements are the same for all power levels.	No
3.7.6	CONDENSATE STORAGE TANK (CST)	Not power level dependent; requirements are the same for all power levels.	No
3.7.7	COMPONENT COOLING WATER (CCW) SYSTEM	Not power level dependent; requirements are the same for all power levels.	No
3.7.7.1	COMPONENT COOLING WATER (CCW) SAFETY RELATED MAKEUP SYSTEM	Not power level dependent; requirements are the same for all power levels.	No
3.7.8	SALTWATER COOLING SYSTEM (SWC)	Not power level dependent; requirements are the same for all power levels.	No
3.7.9	Not Used	N/A	No
3.7.10	EMERGENCY CHILLED WATER (ECW)	Not power level dependent; requirements are the same for all power levels.	No
3.7.11	CONTROL ROOM EMERGENCY AIR CLEANUP SYSTEM (CREACS)	Not power level dependent; requirements are the same for all power levels.	No

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3.7.12 - 3.7.15	Not Used	N/A	No
3.7.16	FUEL STORAGE POOL WATER LEVEL	Not power level dependent.	No
3.7.17	FUEL STORAGE POOL BORON CONCENTRATION	Not power level dependent.	No
3.7.18	SPENT FUEL ASSEMBLY STORAGE	Not power level dependent.	No
3.7.19	SECONDARY SPECIFIC ACTIVITY	Not power level dependent; requirements are the same for all power levels.	No
3.8.1	AC SOURCES - OPERATING	Not power level dependent; requirements are the same for all power levels.	No
3.8.2	AC SOURCES - SHUTDOWN	Not power level dependent.	No
3.8.3	DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR	Not power level dependent; requirements are the same for all power levels.	No
3.8.4	DC SOURCES - OPERATING	Not power level dependent; requirements are the same for all power levels.	No
3.8.5	DC SOURCES - SHUTDOWN	Not power level dependent.	No
3.8.6	BATTERY PARAMETERS	Not power level dependent; requirements are the same for all power levels.	No
3.8.7	INVERTERS - OPERATING	Not power level dependent; requirements are the same for all power levels.	No
3.8.8	INVERTERS - SHUTDOWN	Not power level dependent.	No
3.8.9	DISTRIBUTION SYSTEMS - OPERATING	Not power level dependent; requirements are the same for all power levels.	No
3.8.10	DISTRIBUTION SYSTEMS - SHUTDOWN	Not power level dependent.	No
3.9.1	BORON CONCENTRATION	Not power level dependent; applicable only to Mode 6.	No
3.9.2	NUCLEAR INSTRUMENTATION	Not power level dependent; applicable only to Mode 6.	No
3.9.3	CONTAINMENT PENETRATIONS	Not power level dependent.	No
3.9.4	SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - HIGH WATER LEVEL	Not power level dependent; applicable only to Mode 6.	No

TECHNICAL SPECIFICATION IMPACT ASSESSMENT FOR OPERATION AT 70% POWER			
SONGS Unit 2 Tech. Spec.	**Description**	**TS LCO, Applicability, Actions, & Surveillance Requirements Impact**	**TS Change Required ?**
3.9.5	SHUTDOWN COOLING (SDC) AND COOLANT CIRCULATION - LOW WATER LEVEL	Not power level dependent; applicable only to Mode 6.	No
3.9.6	REFUELING WATER LEVEL	Not power level dependent.	No
4.1	DESIGN FEATURES -- SITE	Not power level dependent.	No
4.2	REACTOR CORE	Not power level dependent.	No
4.3	FUEL STORAGE	Not power level dependent.	No
5.1	RESPONSIBILITY	Not power level dependent.	No
5.2	ORGANIZATION	Not power level dependent.	No
5.3	UNIT STAFF QUALIFICATION	Not power level dependent.	No
5.4	TECHNICAL SPECIFICATION (TS) BASES CONTROL	Not power level dependent.	No
5.5	PROCEDURES, PROGRAMS, AND MANUALS	Power level dependent. License Amendment Request PCN 602 requests that Technical Specification 5.5.2.11.b.1 be revised to add a footnote to require that compliance with the steam generator structural integrity performance criterion (SIPC) be demonstrated up to 70% rated thermal power. Remaining procedures, programs and manuals addressed in Section 5.5 are not power level dependent.	Yes
5.6	SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)	Not power level dependent.	No
5.7	REPORTING REQUIREMENTS	Not power level dependent. Technical Specification 5.7.1.5 requires Core Operating Limits Report safety analyses to address operation at Rated Thermal Power. Refer to License Amendment Request PCN 602 commitment regarding Technical Specification 5.7.2.c Steam Generator Program Special Report. Remaining reporting requirements addressed in Section 5.7 are not impacted.	No
5.8	HIGH RADIATION AREA	Not power level dependent.	No