BEFORE THE UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, for a Class 104(b) License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 1 of the San Onofre Nuclear Generating Station

DOCKET NO 50-206

Amendment Application NO. 209

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 209.

This amendment application consists of Proposed Change No. 261 to the Unit 1
Operating (Possession Only) License No. DPR-13. Proposed Change No. 261 will
revise Sections 2.C and 2.D of the Operating License as follows.

Section 2.C contains nine conditions. Four of these conditions do not apply to SONGS 1 in its present shutdown and defueled mode. The proposed change will delete these conditions. Two other conditions continue to apply but they need revision. The purpose of revising one condition is to remove a restriction on the operation of a gantry crane on the turbine building. The purpose of revising the other condition is to update information concerning the physical protection of the plant.

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Section 2.D specifies that any violations of the requirements contained in Section 2.C shall be reported to the NRC. The proposed change will exempt license condition (9), Fire Protection, from the reporting requirements of Section 2.D.

The proposed change has been determined to have no adverse impact on the ability of SONGS 1 to remain in a safe and permanently defueled condition.

Based on the significant hazards analysis provided in the "Description and Significant Hazards Consideration Analysis of Proposed Change No. 261 to Operating (Possession Only) License No. DPR-13", it is concluded that (1) the proposed change does not involve a significant hazards consideration as defined in 10 CFR 50.92; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC's Final Environmental Statement and the NRC's subsequent environmental assessment dated September 16, 1991.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:

Richard M. Rosenblum

Vice President

State of California County of Orange

on 4/18/94 before me, BARBARA A. MCCARTHY NOTALY PUBLIC personally appeared RICHARD M. ROSENBLUM, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his

authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Barbara a. McCarthy



DESCRIPTION AND SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS OF PROPOSED CHANGE NO. 261 TO OPERATING (POSSESSION ONLY) LICENSE NO. DPR-13

This is a request to revise Sections 2.C and 2.D of the Operating (Possession Only) License No. DPR-13 for the San Onofre Nuclear Generating Station, Unit 1 (SONGS 1). These revisions modify or delete certain license conditions.

Description of Change

Section 2.C

Certain license conditions in Section 2.C do not reflect the current status of SONGS 1 as a permanently shut down plant with no fuel left in the reactor core. The safety and security concerns associated with SONGS 1 have been substantially reduced since plant shutdown and defueling. This was demonstrated by the NRC's issuance of Permanently Defueled Technical Specifications for SONGS 1 on December 28, 1993. Four existing license conditions are no longer relevant. These license conditions can, and should be, deleted. Two license conditions need modification to remove information that is no longer applicable and to remove a requirement that is no longer necessary. This proposed change accomplishes these modifications.

Section 2.D

Section 2.D requires that any violations of the requirements stated in the license conditions of Section 2.C be reported to the NRC. Each of these license conditions addresses a different safety issue and one of them contains fire protection requirements. As explained under "Discussion of Changes", fire protection requirements need not be subject to the reporting requirements of Section 2.D. The proposed change accomplishes this change.

Existing License Conditions

(See Attachment 1)

Proposed License Conditions

(See Attachment 2)

Discussion of Changes

Section 2.C

This proposed change does not affect license conditions (1), (2), and (9). It affects license conditions (3) through (8). The following paragraphs discuss how each condition is affected.

Condition (3) -- Spent Fuel Transshipment

This condition permits the transshipment of spent fuel from the Unit 1 spent fuel pool to the Units 2 and 3 spent fuel pools using the GE model IF-300 shipping cask. It permits the use of the SONGS 1 turbine building gantry crane for fuel transshipment. It does not allow the use of this crane for activities outside of transshipment that involve heavy load handling, pending a separate NRC review. It permits changes in the approved transshipment methods if these changes do not involve an unreviewed safety question as defined in 10 CFR 50.59.

This condition was incorporated in the SONGS 1 Provisional Operating License by an NRC amendment dated December 2, 1988. Its intent was to enable SCE to discontinue using an air pallet system for transporting spent fuel shipping casks over the turbine building and begin using the turbine gantry crane for transporting the casks. (On June 22, 1988, the NRC issued separate license amendments for SONGS 2 and 3, permitting these plants to receive spent fuel from the SONGS 1 spent fuel pool.) The restrictions on the use of the gantry crane were intended to ensure that safety-related equipment in the turbine building would be protected in the event of a heavy load drop accident.

With SONGS 1 shut down and defueled, all reactor refueling operations have permanently ceased. If existing restrictions on operation of the gantry crane are removed, the safe storage of spent fuel in the spent fuel pool will not be affected. Additionally, equipment in the north end of the turbine building that was previously safety-related is no longer required for safe shutdown or accident mitigation. These changes make the restrictions on operation of the gantry crane obsolete. As a result, these restrictions may be deleted without any adverse consequences to the plant.

Condition (4) -- Physical Protection

This condition contains requirements relating to the SONGS 1, 2, and 3 physical security plan, guard training and qualification plan, and safeguards contingency plan. The basic provisions of this condition were incorporated in the license by an amendment issued on January 22, 1981.

As presently written, this license condition needs to be updated in two areas.

- 1. It indicates the SONGS guard training and qualification plan has safeguards information protected under 10 CFR 73.21. All safeguards information has been transferred (over a period of time) to the SONGS physical security plan and safeguards contingency plan. The proposed change updates the license condition by clarifying that all three physical security plans do not necessarily contain safeguards information.
- 2. It contains specific dates to indicate the latest revisions of the three physical protection plans. However, as the result of frequent revisions to these plans, the dates have been superceded. The proposed change deletes specific dates and requires that the latest revisions of the plans be implemented.

Condition (5) -- Integrated Implementation Schedule

This condition requires SCE to implement all capital modifications to SONGS 1 (whether mandated by the NRC or identified by SCE) using an "Integrated Implementation Schedule"(IIS), as described in a program plan issued on April 20, 1987. The IIS program for SONGS 1 followed similar programs established at other utilities. It provided a mechanism for focussing attention on outage-related projects of the highest priority.

Since SONGS 1 has been permanently shut down, no future capital modifications related to the IIS program will take place. Therefore, this condition is no longer needed and it may be deleted without any adverse consequences. (After this condition has been deleted, SCE plans to discontinue the IIS program for SONGS 1.)

Condition (6) -- Cycle 11 Thermal Shield Monitoring Program

This condition was incorporated into the plant license as the result of an amendment issued on December 19, 1990. It establishes requirements for the use of a neutron/loose parts detection system to monitor the condition of the reactor vessel thermal shield throughout Cycle 11 (which ended at the end of November 1992). The thermal shield attenuates neutrons and gammas coming from the core before they bombard the reactor vessel "beltline" area. In this way, radiation-induced embrittlement of the reactor vessel is minimized. The license condition ensures that any changes in the thermal shield support system are detected before significant degradation occurs. This program was established specifically for Cycle 11 operation. In addition, a commitment was made to establish monitoring requirements in the Technical Specifications prior to Cycle 12.

Since SONGS 1 operation has permanently ceased, the integrity of the thermal shield is no longer a concern and there is no need to monitor the thermal shield. The condition may therefore be deleted without any adverse consequences.

Condition (7) -- Plant Modification to Eliminate Single Failure Susceptibility of Vital Bus Automatic Transfer Function

This condition was incorporated in the plant license as the result of an amendment issued on February 28, 1991. It requires that the SONGS 1 electrical distribution system be upgraded to ensure that the power supply for vital buses 1, 2, 3, and 3A associated with Train A is not susceptible to a single failure. These four vital buses supply power to safety-related instrumentation and equipment. They also supply power to equipment and loads inside the containment which are not qualified for operation in a harsh environment. In case of faults on Train A vital bus, the automatic transfer switches will transfer the loads to a back-up power source. The back-up source has sufficient capacity to handle and isolate the faulted loads. However, if Train B should fail after an autotransfer and because the auto-transfer switches are not designed to retransfer, the Train A vital buses will not have any power. The operator manually can do the transfer, and this may cause a temporary inability of the Safeguard Load Sequencing System to actuate the Emergency Core Cooling System operation

necessary to complete the remaining commitments identified in the NRC Order. This condition may therefore be deleted without any adverse consequences.

Section 2.D

Section 2.D requires that any violations of the requirements stated in the license conditions of Section 2.C be reported to the NRC. The initial notification is to take place within 24 hours with written follow-up within 30 days. These reporting requirements predate the SONGS 1 Permanently Defueled Technical Specifications (PDTS), which were issued on December 28, 1993. Simultaneously with the issuance of the PDTS, license condition (9) was added to Section 2.C. This license condition consists of requirements pertaining to the SONGS 1 Fire Protection Program and future changes to this program. Like the other license conditions of Section 2.C, license condition (9) is currently subject to the reporting requirements of Section 2.D. As explained below, this is unnecessary.

The addition of license condition (9) was requested by our PDTS application dated May 12, 1993. Our purpose in requesting this license condition was to achieve compliance with Generic Letters 86-10 and 88-12, which provide fire protection requirements for nuclear power plants. At the time of application, we did not realize that both generic letters describe reportable deficiencies in the Fire Protection Program as those deficiencies which meet the criteria of 10CFR50.72 and 10CFR50.73. All other deficiencies are to be evaluated by the licensee for appropriate corrective action but they are not reportable. Based

necessary, in light of the permanent shutdown of SONGS 1.

The technical basis for modifying the license condition on physical protection is that this is necessary to update the information contained in the license condition.

ATTACHMENT 1 EXISTING LICENSE CONDITIONS



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

DOCKET NO. 50-206

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 155 License No. DPR-13

- 1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for a license filed by the Southern California Edison Company and the San Diego Gas and Electric Company (the licensee) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and applicable portions of the Commission's regulations set forth in 10 CFR Chapter I, and all required notifications to other agencies or bodies have been duly made;
 - B. Construction of San Onofre Nuclear Generating Station, Unit 1 (the facility) has been completed in conformity with Construction Permit No. CPPR-13 and the application, as amended, the provisions of the Act, and the regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the applicable rules and regulations of the Commission;
 - D. There is reasonable assurance: (i) that the activities authorized by this amended license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with applicable portions of the Commission's regulations set forth in 10 CFR Chapter I;
 - E. The licensee is technically qualified to engage in the activities authorized by this license in accordance with the Commission's regulations set forth in applicable portions of 10 CFR Chapter I;
 - F. The licensee has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;

- G. The issuance of this license will not be inimical to the common defense and security or to the health and safety of the public;
- H. The issuance of this license is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied; and
- I. The possession of source, byproduct, and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70.
- Facility Operating License No. DPR-13, dated September 26, 1991, as amended, is superseded in its entirety by Possession Only License (POL) No. DPR-13, hereby issued to the licensee to read as follows:
 - A. This license applies to the San Onofre Nuclear Generating Station, Unit No. 1, a pressurized water reactor and associated equipment (the facility). The facility is located on the site of Southern California Edison Company and San Diego Gas and Electric Company near the northern boundary of Camp Pendleton in San Diego County, California, and is described in the licensee's Updated Final Safety Analysis Report, as supplemented and amended, and in the licensee's Environmental Report, as supplemented and amended.
 - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E), with SCE acting for itself and as a agent for SDG&E:
 - (1) Pursuant to Section 104b of the Act and 10 CFR Part 50, to possess but not operate the facility at the designated location in San Diego County, California, in accordance with the procedures and limitations set forth in this license;
 - (2) Pursuant to the Act and 10 CFR Part 70, to possess at any time special nuclear material as reactor fuel, in accordance with the limitations for storage as described in the Updated Final Safety Analysis Report, as supplemented and amended;
 - (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source, and special nuclear material as sealed sources for reactor instrumentation, and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 - (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess or use in amounts as required any byproduct, source, or special nuclear material without restriction to

chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

- (5) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Act and the applicable provisions of the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is not authorized to operate the facility as a nuclear reactor.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 155 are hereby incorporated in the license. Southern California Edison Company shall maintain the facility in accordance with the Technical Specifications.

(3) Spent Fuel Transshipment

The licensee is authorized to transship spent fuel from the Unit 1 spent fuel pool to the Unit 2 and 3 spent fuel pools in accordance with licensee's application for amendment dated April 28, 1988, as supplemented April 25, June 10, September 23, October 18, November 10, and December 1, 1988.

This authorization is limited to those activities needed for transshipment only. The matter of heavy load handling using the turbine gantry crane for purposes other than transshipment is being reviewed separately.

The licensee may make changes to the transshipment methods referenced above without prior NRC approval only if the change does not involve an unreviewed safety question as defined in 10 CFR 50.59.

(4) Physical Protection

SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain safeguards information protected under 10 CFR 73.21, are entitled: Onofre Nuclear Generating Station, Units 1, 2, and 3 Physical Security Plan, with revisions submitted through April 22, 1988; "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Security Force Training and Qualification Plan, " with revisions submitted through October 22, 1986; and "San Onofre Nuclear Generating Station, Units 1, 2, and 3, Safeguards Contingency Plan," with revisions submitted through December 29, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

A. ..

(5) Integrated Implementation Schedule

Southern California Edison Company shall implement a plan for scheduling all capital modifications based on the Integrated Implementation Schedule Program Plan (the "Plan") issued in License Amendment No. 98 on April 20, 1987.

- (a) The plan shall be followed by the licensee from and after the effective date of Amendment 98.
- (b) Changes to completion dates for items identified in Schedules B and C do not require a license amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedures.

(6) Cycle 11 Thermal Shield Monitoring Program

The neutron noise/loose-parts detection system shall be used to monitor the condition of the reactor vessel thermal shield throughout Cycle 11. Periodic monitoring of both neutron noise and loose-parts vibrations confirms that no long-term unacceptable trend of degradation is occurring. The details of this program are described below.

(a) Acceptance criteria for neutron noise/loose-parts monitoring will be established by performing baseline evaluations for 60 days at greater than or equal to 85% power following return to service for Cycle 11 operation.

The base line data will be established by recording a minimum of 16 segments of data information, each of 20 minute duration at greater than or equal to 85% power. Adjustments to the acceptance criteria will be made for cycle burnup and boron concentration changes throughout the cycle.

- (b) The neutron noise/loose-parts monitoring system shall be OPERABLE in MODE 1 with:
 - (i) at least two horizontal loose-parts detectors monitored for at least 5 minutes two times per day; and,
 - (ii) at least three (3) neutron noise inputs monitored for at least 20 minutes once a week, and be analyzed for cross power spectral density, including phase and coherence.
- (c) The data provided by the loose-parts/neutron noise monitor shall be analyzed once per week and compared with the established criteria. If the data exceeds the acceptance criteria:
 - (i) within 1 day the NRC will be informed;
 - (ii) within 14 days the conditions will be evaluated and a report provided to the NRC documenting future plans and actions.
- (d) Each channel of the loose-part detection system shall be demonstrated OPERABLE in MODE 1 by performance of a:
 - (i) CHANNEL CHECK at least once per 24 hours
 - (ii) CHANNEL TEST at least once per 31 days

The surveillance requirements for neutron noise monitor are covered by the Appendix A Technical Specification 4.1.1 for the Power Range Neutron Flux.

(e) With the neutron noise/loose-parts detection instrumentation inoperable for more than 7 days, licensee shall submit a Special Report to the Commission pursuant to Appendix A Technical Specification 6.9.2 within the next 3 days outlining the cause of the malfunction and the plans for restoring the system operable status.

(f) The provisions of Appendix A Technical Specification 3.0.4 are not applicable to this license condition.

(7) <u>Plant Modification to Eliminate Single Failure</u> <u>Susceptibility of Vital Bus Automatic Transfer Function</u>

Southern California Edison Company shall modify the electrical distribution system to ensure that the availability of a power source for vital buses 1, 2, 3, and 3A is not subject to a single failure susceptibility. The plant modification shall satisfy the design requirements of the safety-related portions of the existing electrical distribution system and shall be operable prior to restart from the Cycle 12 refueling outage.

(8) Confirmatory Order dated January 2, 1990

The licensee shall comply with commitments documented in the NRC confirmatory order issued on January 2, 1990, as amended. The confirmatory order contains a list of required plant modifications and evaluations with associated implementation schedules.

(9) Fire Protection

The licensee shall implement and maintain in effect all provisions of the SONGS 1 Fire Protection Program approved in Safety Evaluation Reports dated July 19, 1979, February 4, 1981, June 27, 1986, and April 8, 1987, as described in the Updated Fire Hazards Analysis (UFHA), originally submitted February 11, 1985, and periodically revised thereafter, subject to the following provisions:

The licensee may make changes to the SONGS 1 Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to maintain the fuel in the spent fuel pool in a safe condition in the event of a fire, or increase the likelihood of a significant offsite release of radioactive material due to a fire.

- E. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- F. This amended license is effective as of the date the licensee provides certification that operation of the reactor has been permanently terminated and all special nuclear material as reactor fuel has been permanently removed from the reactor and stored in the spent fuel pool. This amended license shall expire at midnight on March 2, 2004.

FOR THE NUCLEAR REGULATORY COMMISSION

Medufa

Jack W. Roe, Director
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Appendix A - Technical Specifications

Date of Issuance: October 23, 1992

ATTACHMENT 2 PROPOSED LICENSE CONDITIONS

Sections 2.C and 2.D of the Operating License will be revised to read as follows:

C. This license shall be deemed to contain and is subject to the conditions specified in the Act and the applicable provisions of the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is not authorized to operate the facility as a nuclear reactor.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. ___ are hereby incorporated in the license. Southern California Edison Company shall maintain the facility in accordance with the Technical Specifications.

(3) Spent Fuel Transshipment

The licensee is authorized to transship spent fuel from the Unit 1 spent fuel pool to the Unit 2 and 3 spent fuel pools in accordance with licensee's application for amendment dated April 28, 1988, as supplemented April 25, June 10, September 23, October 18, November 10, and December 1, 1988.

The licensee may make changes to the transshipment methods referenced above without prior NRC aproval only if the change does not involve an unreviewed safety question as defined in 10 CFR 50.59.

(4) Physical Protection

SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, including their latest revisions, which may contain safeguards information protected under 10 CFR 73.21, are entitled: "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Physical Security Plan", "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Security Force Training and Qualification Plan", and "San Onofre Nuclear Generating Station, Units 1, 2, and 3, Safeguards Contingency Plan." Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

- (6) Deleted
- (7) Deleted
- (8) Deleted
- (9) Fire Protection

The licensee shall implement and maintain in effect all provisions of the SONGS 1 Fire Protection Program approved in Safety Evaluation Reports dated July 19, 1979, February 4, 1981, June 27, 1986, and April 8, 1987, as described in the Updated Fire Hazards Analysis (UFHA), originally submitted February 11, 1985, and periodically revised thereafter, subject to the following provisions:

The licensee may make changes to the SONGS 1 Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to maintain the fuel in the spent fuel pool in a safe condition in the event of a fire, or increase the likelihood of a significant offsite release of radioactive material due to a fire.

D. Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, the licensee shall report any violations of the requirements contained in license conditions 2.C(1) through 2.C(4) in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e).