

April 17, 2014

10 CFR 50.4

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

**Subject: Docket Nos. 50-206, 50-361, 50-362, and 72-41
Summary Report of Commitment Changes Implemented During the Period
From March 2, 2013, Through March 1, 2014
San Onofre Nuclear Generating Station (SONGS) Units 1, 2 and 3, and the
Independent Spent Fuel Storage Installation**

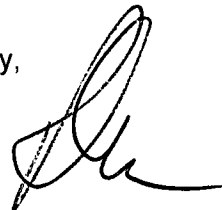
Dear Sir or Madam:

Pursuant to the guidance in Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0, attached is a summary of commitments changed during the period from March 2, 2013 through March 1, 2014. These commitment changes were evaluated by SONGS as not requiring prior NRC approval. This letter provides NRC notification of these changes. Attachment 1 includes a summary of regulatory commitment changes and a basis for each change.

During this reporting period two separate commitment change reports were also provided. Both reports pertained to commitments for implementation of the mitigating strategies required by Commission Order EA-02-026 Section B.5.b and subsequently incorporated into License No. NPF-10 as Mitigating Strategy License Condition C(26) and into License No. NPF-15 as Mitigating Strategy License Condition C(27). Those reports are dated September 3, 2013 and January 2, 2014. Those reports are withheld from public disclosure because they contain Security Related Information. That information is not duplicated in this report.

This letter does not contain any new commitments. If you have any questions or would like any additional information, please contact Mr. Tom Tramm at (949) 368-6687.

Sincerely,



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FSME20
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Attachments: As Stated

cc: M. L. Dapas, Regional Administrator, NRC Region IV
M. H. Chernoff, NRC Project Manager, San Onofre Units 2 and 3
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

**ATTACHMENT 1- SUMMARY REPORT OF REGULATORY COMMITMENT CHANGES IMPLEMENTED
DURING THE PERIOD FROM MARCH 2, 2013 THROUGH MARCH 1, 2014**

SONGS Tracking Nos.	Source(s)	Proposed Action	Change Summary and Basis for Change
<p>NRCTS 1988-05-001, 002, 003, & 004 NN 202376533</p>	<p>SCE letter to NRC dated May 31, 1985, Response to Generic Letter 88-05.</p>	<p>001: "As identified in the enclosure, SCE relies heavily on existing practices to address boric acid leakage. By July 1, 1988 a revision will be made to the Nonconformance Report (NCR) program to address boric acid leakage. This revision will ensure that any boric acid leakage discovered will be documented and dispositioned using the NCR program. Additionally, by September 1988, the Station Technical organization will implement a procedure which will formalize and integrate practices related to boric acid leakage control."</p> <p>002: "These visual inspections have proven to be effective in identifying boric acid leakage. Procedure revisions will be written to formalize the existing inspection points. Procedures will identify specific areas to be visually inspected, and where necessary, provide detailed guidance regarding obscure locations within an area. Procedure revisions will be in place by September 1988, in time for the next refueling outage for each unit."</p> <p>003: "Revisions to Station Technical procedures and to the NCR procedure will result in all identified boric acid leaks being subject to the NCR program. The NCR procedure provides for thorough investigation of identified deficiencies, evaluation of their effects and identification of corrective actions. This change will add more formality and an engineering review to the existing process and ensure appropriate priority in the evaluation and elimination of the boric acid leaks. By July 1, 1988 program revisions will ensure that any boric acid leakage discovered will be evaluated and dispositioned using NCR's."</p> <p>004: "Use of the existing NCR program will require that all boric acid leakage be adequately evaluated which may include a formal Root Cause Evaluation, and that the identified corrective actions be implemented which could include design changes to minimize sources of leakage and the use of corrosion resistant materials, as necessary."</p>	<p>Because of the permanent shutdown of SONGS, the Boric Acid Corrosion Control Program (BACCP), which implemented the commitments, will no longer be maintained.</p> <p>The purpose of the BACCP is to ensure boric acid leaks in the Reactor Coolant System (RCS) and other boric acid systems are evaluated and corrected in a timely manner such that the reactor coolant boundary integrity is not compromised. Because of the permanent shutdown of SONGS, the RCS will no longer be in service. Other systems which remain in service, such as Spent Fuel Pool cooling, normally operate below 100 deg F. EPRI and other technical evaluations of boric acid corrosion have concluded that boric acid attack is very slow and often self-limiting at these low temperatures. The Boric Acid Program will be cancelled and any boric acid leaks in the remaining boric acid containing systems will be addressed by the Corrective Action Program (CAP) and supplemented by system engineer condition monitoring of responsible systems.</p>

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(continued)	SCE letter to NRC dated June 11, 2007, Facility and Commitment Change Reports.	<p>FCR 2007: "2. REVISING THE METHODOLOGY OF COMPONENT COOLING WATER (CCW) HEAT EXCHANGER TESTING</p> <p>In the March 29, 1991 "Program Response for Generic Letter 89-13, Service Water System Problems Affecting Safety-Related Equipment," SCE informed the NRC that part of the program to address Service Water System problems affecting safety-related equipment would include performance testing of the CCW heat exchangers every refueling outage while on shutdown cooling at the start of refueling outages. After three tests, the licensees were allowed to determine the best test frequency to provide assurance that the equipment will perform the intended safety functions during the intervals between tests with the minimum extended frequency being 5 years. After several inspections, it was determined that the CCW heat exchanger performance tests could be conducted under normal operating conditions. This commitment change was transmitted in SCE Facility Change Report dated January 21, 1998. As a result of evaluating the effects of backflushing, it was determined that the CCW heat exchanger performance tests should be performed on only one CCW heat exchanger during each refueling outage after backflushing with the heat load at least equal to 20% of the design heat load. The other CCW heat exchanger would be tested on-line, under normal operating conditions, for information only.</p> <p>This is a change to a commitment made in response to a Generic Letter which has been implemented. Following the NEI Guidelines for Managing NRC Commitment Changes, this commitment can be revised and the NRC notified in the next Refueling interval summary report (Facility Change Report)."</p>	

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<p>NRCTS 1993-09-001, 002, & 003</p> <p>NRCTS 1994-02-001, & 002</p> <p>NRCTS 1997-03-001, 002, & 003</p> <p>NN 202376533</p>	<p>SCE letter to NRC dated September 30, 1993, Response to Generic Letter 89-10, Supplement 5, "Inaccuracy of Motor-Operated Valve Diagnostic Equipment"</p> <p>SCE letter to NRC dated February 11, 1994, Response to Notice of Deviation</p> <p>SCE Letter to NRC dated March 13, 1997, 180 Day Response to Generic Letter 96-05; "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves"</p>	<p>09-001 For uncertainties associated with other diagnostic systems, including thrust measurement using strain gages, SCE will ensure that the uncertainty of those systems will be less than the value for diagnostic system uncertainties used in the GL 89-10 setpoint calculation.</p> <p>09-002 A TLU calculation will be performed to determine stem and yoke-mounted strain gage thrust measurement uncertainties.</p> <p>09-003 For MOVs set and tested using the TMD during future refueling outages, a MOVATS ER 5.2 evaluation will be completed prior to returning the MOVs to service. In addition, by the end of the Unit 3 Cycle 8 refueling outage, SCE will complete documentation and validation of new information on MOV diagnostic equipment inaccuracy and evaluations to account for uncertainty in setting operating thrust to ensure operability for all MOVs in the San Onofre Units 2 and 3 GL 89-10 program.</p> <p>02-001 In order to provide a final resolution of this issue, prior to the completion of the Cycle 8 refueling outage, Edison will: 1) Reanalyze DC MOVs using the Limitorque methodology, and/or,</p> <p>02-002 In order to provide a final resolution of this issue, prior to the completion of the Cycle 8 refueling outage, Edison will: 2) obtain motor specific performance data which will then be used as the basis for our GL 89-10 design basis calculations.</p> <p>03-001 A surveillance test of all safety-related MOVs within the GL 89-10 MOV program scope will be performed at an interval no greater than one refueling cycle. Verification of each valve to successfully complete a full open and close stroke will be provided as a result of this test and documented as part of the current In Service Testing Program.</p> <p>03-002 All safety-related MOVs within the GL 89-10 MOV program scope will be fully stroked statically at an interval no greater than three refueling cycles with a diagnostic device that provides a quantitative verification of the motor actuator thrust and/or torque output. This testing will be performed in conjunction with the scheduled periodic maintenance activities on the valves and includes (when possible) an as-found and as-left test. Results of the static testing will be evaluated by the MOV Test Data Reconciliation Procedure (Reference 7).</p> <p>03-003 All valve factor dependent valves (i.e., gate valves) within the program population considered to have a low thrust and/or valve factor margin will be fully stroked dynamically (if practicable) at an interval no greater than three refueling cycles. The diagnostic test</p>	<p>Because of the permanent shutdown of SONGS, the Motor Operated Valve (MOV) Program, which implemented the above commitments, will no longer be maintained.</p> <p>The purpose of the MOV Program implements static and design basis (dynamic) testing of safety related MOVs to meet the requirements of Generic Letter 89-10. There are no remaining valves within the scope of GL 89-10 required to be operable in the shutdown and defueled configuration. The MOV Program and procedure (SO123-V-5.22.1) will be cancelled as they are no longer required.</p>

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(continued)		equipment utilized should provide a quantitative verification of the motor actuator output thrust and torque as well as system parameters of pressure and flow (if available) in order to provide a basis for determining valve factor. Results of the dynamic testing will be evaluated by the MOV Test Data Reconciliation Procedure (Reference 7).	
NRCTS 2010-09-002, 003, 004, and 007 NN 202376533	SCE Letter dated June 28, 2010, NEI 09-14 Buried Piping Integrity	<p>002: "1) By June, 30, 2010, Procedures and Oversight:</p> <ul style="list-style-type: none"> • Ensure clear roles and responsibilities including senior level accountability for the Buried Piping Integrity Program. • Develop a Buried Piping Integrity Program document and implementing procedures." <p>003: "2) By December 31, 2010, Risk Ranking. Risk Rank buried piping segments. Risk Ranking shall incorporate the following attributes:</p> <ul style="list-style-type: none"> • Pipe function • Pipe locations and layout • Pipe materials and design • Health of cathodic protection systems, if applicable • Based on the above data and other information, determine: <ul style="list-style-type: none"> The likelihood of failure of each piping segment The consequences of failure of each piping segment • A means to update the risk ranking as necessary • A database to track key program data, inspection results, and trends." <p>004: "3) By June 30, 2011, Inspection Plan-Develop an inspection plan to provide reasonable assurance of integrity of buried piping. This plan shall include the following key attributes:</p> <ul style="list-style-type: none"> • Identification of piping segments to be inspected • Potential inspection techniques • Inspection schedule for buried piping segments based on 	<p>Because of the permanent shutdown of SONGS, the Buried Piping Program, which implemented the above commitments, will no longer be maintained.</p> <p>The purpose of Buried Piping program is to provide reasonable assurance of the integrity of an array of buried piping and tanks that are being removed from service in preparation for decommissioning. The NEI 09-14 Buried Piping Program will be cancelled because the hazards are significantly reduced. Problems with the limited amount of underground piping that remains in service will be addressed by the Corrective Action Program (CAP) and supplemented by condition monitoring of associated systems by engineering personnel.</p> <p>The focus of NEI 09-14 is underground piping that is safety related, that carries licensed (radioactive) material, or carries fuels, gases or other media governed by local or state laws. The SONGS Buried Piping Program, as described in SO123-XV-110, Revision 3, exceeded the minimum requirements of NEI -09-14, including piping that was not included in the scope of NEI 09-14.</p> <p>SONGS only has two significant buried lines per unit remaining in service: the Diesel Generator Fuel Oil Fill lines. There is also one shared buried Liquid Radwaste Discharge line. At least one of each of these line types has been inspected and found to be in good condition. Additionally, the local soil condition is normally dry and</p>

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(continued)		<p align="center">risk ranking</p> <ul style="list-style-type: none"> • Assessment of cathodic protection, if applicable" <p>007: 3) By December 31, 2012, Condition Assessment Plan(s)- Develop or identify existing condition assessment plans that will provide reasonable assurance of integrity of components within the additional scope of the Underground Piping and Tanks Integrity Initiative. These plans shall include the following key attributes:</p> <ul style="list-style-type: none"> • Identification of underground piping and tanks to be assessed • Potential assessment techniques • Assessment schedules that take into account the relative priority of components. This schedule should be coordinated with the schedule developed for the original Buried Piping Integrity Initiative to ensure that the components with the highest overall priority are addressed first. • Assessment of cathodic protection, if applicable 	<p>not conducive to accelerated external corrosion. These lines are expected to be removed from service within a few years. Past inspections and favorable soil conditions provide reasonable assurance that these lines will retain their integrity for the few years that they remain in service.</p>