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Vice President & Chief Nuclear Officer

June 5, 2014

10 CFR 50.90

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

Subject: **Docket No. 50-361 and 50-362**
Response to Request for Additional Information
and Supplement 1 to Amendment Application Numbers 265 and 250
Responsibility, Organization, and Qualifications
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: (1) Letter from P. T. Dietrich (SCE) to the U.S. Nuclear Regulatory Commission (NRC) dated October 21, 2013; Subject: Amendment Application Numbers 265 and 250, Responsibility, Organization, and Qualifications, San Onofre Nuclear Generating Station, Units 2 and 3

(2) Letter from M. H. Chernoff (NRC) to T. J. Palmisano (SCE) dated June 5, 2014; Subject: San Onofre Nuclear Generating Station, Units 2 and 3, Request for Additional Information re: License Amendment Request to Revise Technical Specifications to Reflect Reduced Staffing/Training in Permanently Shutdown and Defueled Condition (TAC Nos. MF2954 and MF2955)

Dear Sir or Madam:

By letter dated October 21, 2013 (Reference 1), Southern California Edison (SCE) submitted license amendment applications 265 and 250 to operating licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, respectively. Amendment Applications 265 and 250 consisted of proposed changes to Administrative Technical Specifications related to Responsibility, Organization, and Qualifications. The purpose of the proposed changes was to reflect the appropriate staffing and training requirements for the permanently defueled condition of SONGS

By letter dated June 5, 2014 (Reference 2), the NRC requested additional information related to Amendment Applications 265 and 250. The response to the NRC request for additional information is contained in the Enclosure to this letter. The response results in changes to the proposed Technical Specifications of Reference 1. The revised

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Technical Specification pages are provided as a Supplement to Reference 1 and are included as attachments to the Enclosure to this letter.

The changes to the proposed Technical Specifications do not affect the conclusions of the No Significant Hazards Consideration or the Environmental Consideration provided in Reference 1.

There are no new regulatory commitments in this letter or the Enclosure.

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

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

Executed on 6/5/2014

Sincerely,

Enclosure:
Response to NRC Request for Additional Information

cc: M. L. Dapas, Regional Administrator, NRC Region IV
M. H. Chernoff, NRC Project Manager, SONGS Units 2 and 3
R. E. Lantz, NRC Region IV, San Onofre 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

Response to NRC Request for Additional Information

Regarding Amendment Applications 265 and 250

Responsibility, Organization, and Qualifications

San Onofre Units 2 and 3

NRC Request for Additional Information

By letter dated June 5, 2014, the NRC requested additional information regarding Amendment Applications 265 and 250 for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, respectively. Provided below are the NRC questions and the Southern California Edison (SCE) responses.

NRC Question 1:

The proposed defueled TS section 5.1.2 for SONGS Units 2 and 3 state:

> "The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public."

The proposed defueled TS 5.1.2 states that the Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations. However, pursuant to Title 10 of the Code of Federal Regulations (10 CFR) Section 50.82(a)(2), the operating licenses for SONGS Units 2 and 3 no longer authorize operation of these reactors. Since the Units are not in an operating status, please provide a basis for retention of word 'operations,' in the description of Shift Manager's responsibilities.

SCE Response:

SCE agrees that the term "operations" no longer applies to San Onofre Nuclear Generating Station Units 2 and 3. The term has been deleted from proposed Technical Specification 5.1.2. See attachments for revised markup and clean page of proposed Technical Specification 5.1.2.

NRC Question 2:

SCE proposes to delete paragraph d of TS 5.2.2, which states:

> "A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position."

SCE stated that this paragraph is being deleted because this requirement only applies when fuel is in the reactor.

The regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.36(c)(5) state that TS Administrative Controls "are the provisions relating to organization and management...necessary to assure operation of the facility in a safe

manner." The U.S. Nuclear Regulatory Commission (NRC) staff believes it is prudent to have an individual qualified in radiation protection procedures on site during fuel handling operations or during movements of loads over storage racks containing fuel.

This staff position is consistent with the proposed TSs for permanently defueled Westinghouse plants contained in draft NUREG-1625, "Proposed Standard Technical Specifications for Permanently Defueled Westinghouse Plants." This draft requires in TS 5.2.2.c that:

> "c. An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel;

Please provide the Administrative Controls necessary to ensure an individual qualified in radiation protection techniques is onsite during fuel movement or movement of loads over the spent fuel storage racks.

SCE Response:

SCE will include a requirement for an individual qualified in radiation protection procedures to be on site during fuel handling operations or during movements of loads over storage racks containing fuel. The requirement has been added as proposed Technical Specification 5.2.2.e. See the attachments to this Enclosure for revised markup and clean page of proposed Technical Specification 5.2.2.

NRC Question 3:

In the proposed Table 5.2.2-1, minimum Shift Crew Composition, there is a position described as a "Certified Operator". Please describe the minimum qualifications and duties of this position.

SCE Response:

Certified operators are trained in accordance with SONGS procedure SO23-XXI-TPD-CO, Certified Operator Training Program Description. This procedure states that the training program shall be in accordance with ANSI N18.1-1971 and that the systems approach to training (SAT) process will be used for initial and continuing training of certified operators. The Certified Operator Training Program Description procedure identifies entry level requirements, initial training requirements, and continuing training requirements. The certified operator is an "operator" as described in ANSI N18.1-1971 Section 3.2.4, "Operators - Technicians - Repairmen," which says that "operators" are "persons principally involved in the...operation of plant equipment."

Attachment A

Replacement Pages
Proposed Technical Specifications, Redline and Strikeout
San Onofre Unit 2

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant shall be responsible for overall ~~unit operation and maintenance of~~ management of the ~~Units 2 and 3 at~~ San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities ~~and operations~~ which affect the safety of the plant, site personnel, and/or the general public. ~~A management directive to this effect, signed by the corporate officer with direct responsibility for the plant shall be reissued to all site/station personnel on an annual basis.~~ Sup. 1

~~5.1.3~~ ~~The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.~~

5.2 Organization (continued)

5.2.2 ~~UNIT~~ FACILITY STAFF

The ~~unit~~ facility staff organization shall include the following:

a. ~~A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.~~ Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 5.2.2-1.

~~With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.~~

~~b.~~ ~~At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.~~

~~c.~~b. Shift crew composition may be less than the minimum requirement of ~~10 CFR 50.54(m)(2)(i) and 5.2.2.a~~ Table 5.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

~~d.~~c. ~~A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.~~ Oversight of fuel handling operations shall be provided by a Certified Fuel Handler.

~~e.~~ ~~Deleted~~

~~f.~~d. The Shift Manager~~, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors~~ shall ~~hold~~ be a ~~Senior Reactor Operator's license.~~ Certified Fuel Handler.

~~g.~~e. ~~The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.~~An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel. Sup. 1

(continued)

Attachment B

Replacement Pages
Proposed Technical Specifications, Redline and Strikeout
San Onofre Unit 3

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant shall be responsible for overall ~~unit operation and maintenance of~~ management of the ~~Units 2 and 3 at~~ San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities ~~and operations~~ which affect the safety of the plant, site personnel, and/or the general public. ~~A management directive to this effect, signed by the corporate officer with direct responsibility for the plant shall be reissued to all site/station personnel on an annual basis.~~ Sup. 1

~~5.1.3 The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.~~

5.2 Organization (continued)

5.2.2 ~~UNIT~~ FACILITY STAFF

The ~~unit~~ facility staff organization shall include the following:

a. ~~A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.~~ Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 5.2.2-1.

~~With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.~~

~~b.~~ ~~At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.~~

~~c.~~b. Shift crew composition may be less than the minimum requirement of ~~10 CFR 50.54(m)(2)(i) and 5.2.2.a~~ Table 5.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

~~d.~~c. ~~A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.~~ Oversight of fuel handling operations shall be provided by a Certified Fuel Handler.

~~e.~~ ~~Deleted~~

~~f.~~d. The Shift Manager~~, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors~~ shall ~~hold~~ be a ~~Senior Reactor Operator's license.~~ Certified Fuel Handler.

~~g.~~e. ~~The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.~~An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel. } Sup. 1

(continued)

Attachment C

Replacement Pages
Proposed Technical Specifications, Clean
San Onofre Unit 2

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant shall be responsible for overall management of the San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities which affect the safety of the plant, site personnel, and/or the general public.

Sup. 1

5.2 Organization (continued)

5.2.2 FACILITY STAFF

The facility staff organization shall include the following:

a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 5.2.2-1.

b. Shift crew composition may be less than the minimum requirement of Table 5.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. Oversight of fuel handling operations shall be provided by a Certified Fuel Handler.

d. The Shift Manager shall be a Certified Fuel Handler.

e. An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel. Sup. 1

(continued)

Attachment D

Replacement Pages
Proposed Technical Specifications, Clean
San Onofre Unit 3

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant shall be responsible for overall management of the San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities which affect the safety of the plant, site personnel, and/or the general public.

3 Sup. 1

5.2 Organization (continued)

5.2.2 FACILITY STAFF

The facility staff organization shall include the following:

a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 5.2.2-1.

b. Shift crew composition may be less than the minimum requirement of Table 5.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. Oversight of fuel handling operations shall be provided by a Certified Fuel Handler.

d. The Shift Manager shall be a Certified Fuel Handler.

e. An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel. Sup. 1

(continued)