

10 CFR 50.90

September 15, 2014

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 2 to  
Amendment Application Numbers 265 and 250, Responsibility, Organization,  
and Qualifications, San Onofre Nuclear Generating Station, Units 2 and 3**

- References:
- (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 (ADAMS Accession No. ML13296A013)
  - (2) Letter from T. J. Palmisano (SCE) to the NRC dated June 5, 2014; Subject: 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 (ADAMS Accession No. ML14161A464)
  - (3) E-Mail from T. J. Wengert (NRC) to A. Sterdis (SCE) dated September 11, 2014; Subject: San Onofre Nuclear Generating Station, Units 2 and 3, Revised Draft Request for Additional Information License Amendment Request Regarding Changes to the Administrative Controls Section of the Technical Specifications (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. License Amendment Applications 265 and 250 consist of proposed changes to Technical Specifications (TS) 5.1, Responsibility, TS 5.2, Organization, and TS 5.3, Staff Qualifications to reflect the permanently defueled condition of the plant. License Amendment Applications 265 and 250 were subsequently supplemented by letter dated June 5, 2014 (Reference 2), with changes to proposed TS 5.1.2 and proposed TS 5.2.2.e.

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LRR

By E-Mail dated September 11, 2014 (Reference 3), the NRC requested additional information related to License Amendment Applications 265 and 250. The SCE response to the NRC request for additional information (RAI) is contained in the Enclosure to this letter and results in changes to proposed TS 5.2.2 provided in Reference 1 and supplemented in Reference 2. The revised TS pages are included in Attachments A (Unit 2 revised TS pages markup), B (Unit 3 revised TS pages markup), C (Unit 2 revised clean typed TS pages), and D (Unit 3 revised clean typed TS pages), of the Enclosure to this letter. These TS pages are replacement pages for the applicable TS pages submitted in Reference 2.

The changes to the proposed TS 5.2.2 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 Ms. Andrea Sterdis at (949) 368-9985.

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

Executed on 9/15/2014  
(Date)

Sincerely,



Enclosure:

Response to NRC Request for Additional Information (RAI) Regarding Amendment Applications 265 and 250, Responsibility, Organization, and Qualifications, San Onofre Units 2 and 3 and Attachments

cc: M. L. Dapas, Regional Administrator, NRC Region IV  
T. J. Wengert, 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 (RAI) Regarding  
Amendment Applications 265 and 250**

**Responsibility, Organization, and Qualifications**

**San Onofre Units 2 and 3**

ENCLOSURE

Response to NRC RAI Regarding Amendment Application Numbers 265 and 250

**Background for RAI-1:**

SCE has proposed the following administrative requirements in the permanently defueled Technical Specifications:

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

Table 5.2.2-1  
Minimum Shift Crew Composition

POSITION	MINIMUM STAFFING
Certified Fuel Handler	1*
Certified Operator	1

Note: The Certified Operator position may be filled by a Certified Fuel Handler.  
\*May be shared between Units 2 and 3.

However, the technical specification is silent as to the location of the crew. SCE has not proposed any other technical specification that addresses or restricts the location of the operations shift onsite. For a reactor authorized to operate, the regulations in 10 CFR 50.54(m) specify a minimum control room staffing level at all times. For a permanently shutdown and defueled reactor, 10 CFR 50.54(m) is not applicable. There is no equivalent regulation that directly requires control room staffing for a permanently shutdown and defueled reactor. As such, it is conceivable that the control room at SONGS could be unoccupied for periods of time if the technical specifications, as proposed, were approved.

The NRC staff recognizes that management, oversight and control of spent fuel pool operations may not require a presence in the control room and resolution of most operational issues related to spent fuel pool (SFP) function may be more readily accomplished at the SFP location. Because of the robust design of the SFP and the low decay heat load of the stored fuel, events involving the SFP are expected to evolve slowly and continuous manning of the control room by the shift manager may not be necessary at all times. However, SCE has not fully justified its basis for proposing technical specifications that would permit no staffing presence in the control room.

Specifically;

- No discussion has been provided on how the operations staff would become aware of and respond to any control room alarms or instrument indications of abnormal conditions (such as off-normal radiation, fire, or electrical anomalies) if no one is present in the control room.
- The control room is a communications focal point. SCE has not addressed how communications are coordinated, both internally to the site and with external agencies (such as the NRC), without an operations crew present in the control room. Given a condition where the control room is not staffed, an explanation of the communications

## ENCLOSURE

Response to NRC RAI Regarding Amendment Application Numbers 265 and 250

systems that would be used for coordination of activities and notifications, both onsite and with external agencies, should be provided. For example, how would SONGS receive an important security related notification from NRC that may be placed via the ENS system?

### **RAI-1**

Please provide a comprehensive discussion and justification supporting the absence of a requirement for minimum control room staffing in the technical specifications. The discussion should specifically address how the current functions of the control room will be accomplished if the control room is not continuously staffed by qualified personnel.

### **SCE Response:**

Removal of the Technical Specifications (TS) requirement is not intended to infer that no operating staff (identified in TS Table 5.2.2-1) would be present in the Control Room. Rather, it was SCE's intent to maintain appropriate presence in the Control Room under administrative controls as the site conditions and related requirements evolved. However, SCE has re-evaluated this position and has determined that TS 5.5.2.b should be revised to explicitly require at least one person qualified as Emergency Coordinator/Emergency Director be in the Control Room when nuclear fuel is stored in the spent fuel pools. The position of Emergency Coordinator is defined in the SONGS Emergency Plan, and the position of Emergency Director is the equivalent position in the Permanently Defueled Emergency Plan (PDEP), which is currently under review by the NRC. As stated in the PDEP, the Shift Manager assumes the title and responsibilities of the Emergency Director when an event is initially recognized and declared, and remains the Emergency Director throughout the event. As stated in proposed TS 5.5.2.e, the Shift Manager shall be a Certified Fuel Handler and as required by TS 5.2.2.a and Table 5.2.2-1, a Certified Fuel Handler is required to be part of the minimum on shift crew composition. Maintaining the individual that is overall in charge of Command and Control during an emergency event in the Control Room will help ensure that the SONGS staff is aware of and responds appropriately to any alarms or instrument indications of abnormal conditions (such as off-normal radiation, fire, or spent fuel pool anomalies) in an expeditious manner. The Control Room will normally be the communications focal point, both internally to the site and externally to offsite agencies. SCE believes that maintaining an individual in the Control Room better assures timely communications should an event requiring notification to site personnel or offsite agencies occur. However, SCE intends to qualify additional personnel, such as the Certified Operator, as Emergency Director, so that the Shift Manager can leave the Control Room if necessary. Thus, when the Shift Manager is not present in the Control Room, a qualified Emergency Director (who could be the Certified Operator required as part of the minimum shift crew complement in TS Table 5.2.2-1) will be in the Control Room. This allowance will still ensure that when the Shift Manager is not physically in the Control Room, a qualified individual will remain in the Control Room and can make appropriate decisions regarding indications of abnormal conditions.

TS 5.2.2.b is proposed to be modified in lieu of the deletion previously proposed in Reference 1. Therefore, the remaining requirements in TS 5.2.2 are renumbered.

ENCLOSURE

Response to NRC RAI Regarding Amendment Application Numbers 265 and 250

The revised TS pages are included in Attachments A (Unit 2 revised TS pages markup), B (Unit 3 revised TS pages markup), C (Unit 2 revised clean typed TS pages), and D (Unit 3 revised clean typed TS pages), of the Enclosure to this letter. These TS pages are replacement pages for the applicable TS pages submitted in Reference 2.

## ENCLOSURE

Response to NRC RAI Regarding Amendment Application Numbers 265 and 250

### **RAI-2 (Revised)**

Please provide an assessment that demonstrates the emergency plan functions can be conducted assuming the shift manager and/or the non-[sic]certified operator are absent from the control room and are at the most distant permitted locations from the control room. An evaluation that demonstrates that the operations staff can perform its emergency plan functions without a reduction in effectiveness to the emergency plan, given the staff may be anywhere in the protected area when compared to being present in the control room, similar to a 10 CFR 50.54(q)(3) evaluation per the guidance provided in Regulatory Guide 1.219, would be acceptable.

### **SCE Response:**

As stated in the SCE response to RAI-1, TS 5.5.2.b is revised to require at least one person qualified as Emergency Coordinator/Emergency Director be in the Control Room when nuclear fuel is stored in the spent fuel pools. As stated in the Emergency Plan, the Shift Manager assumes the title and responsibilities of the Emergency Coordinator when an event is initially recognized and declared, and remains the Emergency Coordinator until responsibility is transferred to the Station Emergency Director or Corporate Emergency Director. The proposed PDEP states that the Shift Manager assumes the title and responsibilities of the Emergency Director and maintains the responsibilities throughout the event. Therefore, the requested assessment that demonstrates that both the current and the proposed emergency plan functions can be conducted assuming the Shift Manager and/or the Certified Operator are absent from the control room and are at the most distant permitted locations from the control room is not necessary.

Attachment A

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

5.2 Organization (continued)

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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. At least one person qualified as Emergency Coordinator/Emergency Director shall be in the Control Room when nuclear fuel is stored in the spent fuel pools.~~
- c. 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. ~~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.e. 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.f. ~~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.~~

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Attachment B

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

5.2 Organization (continued)

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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. At least one person qualified as Emergency Coordinator/Emergency Director shall be in the Control Room when nuclear fuel is stored in the spent fuel pools.~~

- c. 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. ~~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.e. 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.f. ~~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.~~

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Attachment C

Replacement Pages  
Proposed Technical Specifications, Clean  
San Onofre Unit 2

5.2 Organization (continued)

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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. At least one person qualified as Emergency Coordinator/ Emergency Director shall be in the Control Room when nuclear fuel is stored in the spent fuel pools.
  - c. 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.
  - d. Oversight of fuel handling operations shall be provided by a Certified Fuel Handler.
  - e. The Shift Manager shall be a Certified Fuel Handler.
  - f. An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel.
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Attachment D

Replacement Pages  
Proposed Technical Specifications, Clean  
San Onofre Unit 3

5.2 Organization (continued)

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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. At least one person qualified as Emergency Coordinator/ Emergency Director shall be in the Control Room when nuclear fuel is stored in the spent fuel pools.
  - c. 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.
  - d. Oversight of fuel handling operations shall be provided by a Certified Fuel Handler.
  - e. The Shift Manager shall be a Certified Fuel Handler.
  - f. An individual qualified in radiation protection procedures shall be on site during fuel handling operations or movement of loads over storage racks containing fuel.
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