

## **NRR-PMDAPEm Resource**

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**From:** Wengert, Thomas  
**Sent:** Friday, January 23, 2015 10:59 AM  
**To:** andrea.sterdis@sce.com  
**Cc:** MARK MORGAN; John.Brabec@sce.com; Broaddus, Doug; Grover, Ravinder  
**Subject:** SONGS - Draft RAI RE: Permanently Defueled Technical Specifications License Amendment Request (TAC Nos. MF3774 and MF3775)  
**Attachments:** SONGS - Draft STSB RAI Regarding Defueled TS LAR.pdf

Ms. Sterdis,

By letter dated March 21, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14085A141), as supplemented by letter dated October 1, 2014 (ADAMS Accession No. ML14280A264), Southern California Edison (SCE, the licensee) requested license amendments to revise the Operating License and associated Technical Specifications to reflect the permanent cessation of operation for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3.

Based on the Nuclear Regulatory Commission (NRC) staff's review of SCE's license amendment request submittals, a response to the attached draft request for additional information (RAI) is required to facilitate completion of the staff's technical review. I am sending you this preliminary copy to give you an opportunity to ask clarifying questions if the request is not clear. This RAI will be made publicly available following your review.

Please let me know if SCE would like to have a conference call with the NRC staff to clarify this request. Also, let's discuss the proposed timing for SCE's response.

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**DRAFT REQUEST FOR ADDITIONAL INFORMATION**

**DEFUELED TECHNICAL SPECIFICATION LICENSE AMENDMENT REQUEST**

**SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3**

**SOUTHERN CALIFORNIA EDISON**

**DOCKET NOS. 50-361 AND 50-362**

**TAC NOS. MF3774 AND MF3775**

By letter dated March 21, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14085A141), as supplemented by letter dated October 1, 2014 (ADAMS Accession No. ML14280A264), Southern California Edison requested an amendment to the facility operating licenses. The requested amendment would revise the operating licenses and associated Technical Specifications (TSs) to reflect the permanent cessation of reactor operation and the permanently defueled condition of the reactor vessels at San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The proposed amendment would eliminate most of the previous operating TSs because these TSs are only applicable in operating modes or conditions where fuel is emplaced within the reactor vessel. The proposed license amendment also requested changes to TS definitions and various organizational and program specifications. The following additional information is necessary to complete the Nuclear Regulatory Commission (NRC) staff's technical review:

**RAI-STSB-01:**

The proposed change in the BACKGROUND section of TS 1.3, "Completion Times," replaces the wording "operation of the unit," with "storage of *irradiated* fuel" (emphasis added). The APPLICABILITY for the renumbered Limiting Condition for Operation (LCO) 3.1.3, "Spent Fuel Assembly Storage," states, "Whenever *any* fuel assembly is stored in the fuel storage pool" (emphasis added).

Please resolve this apparent discrepancy in wording and ensure that the Permanently Defueled Technical Specifications (PDTs) are consistent with your proposed resolution to the RAI.

**RAI-STSB-02:**

In renumbered TS 3.1.3, "Spent Fuel Assembly Storage," proposed renumbered Surveillance Requirement (SR) 3.1.3.1 states the following:

Verify by administrative means the initial enrichment, burnup, and cooling time of the fuel assembly in accordance with LCO 3.1.3 or Design Features 4.3.1.1, or LCS 4.0.100.  
Rev 2, dated 09/27/07.

For clarity, the NRC staff requests the licensee to define the abbreviation for Licensee Controlled Specification (LCS) in this section, since it is used for the first time in this LCO of the PDTS.

**RAI-STSB-03:**

In renumbered TS 3.1.3, "Spent Fuel Assembly Storage," the Frequency for the renumbered SR 3.1.3.1 states the following:

Prior to moving a fuel assembly to any spent fuel pool storage location.

With the docketing of the certification for permanent removal of fuel from the reactor vessel to the spent fuel storage location, there should not be any movement of a fuel assembly into the spent fuel pool. Please explain how the specified Frequency applies to SR 3.1.3.1.

**Regulatory Basis**

10 CFR 50.90, Application for amendment of license, construction permit, or early site permit states, in part:

Whenever a holder of a license, including a construction permit and operating license under this part, and an early site permit, combined license, and manufacturing license under part 52 of this chapter, desires to amend the license or permit, application for an amendment must be filed with the Commission, as specified in §§ 50.4 or 52.3 of this chapter, as applicable, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.