

December 15, 2016

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

Subject: **Docket Nos. 50-206, 50-361 and 50-362**
Amendment Applications 225, 272, and 257
ISFSI-only Technical Specifications
San Onofre Nuclear Generating Station, Units 1, 2 and 3

72-041

- References:
- (1) Letter from P. T. Dietrich (SCE) to Document Control Desk (NRC), dated June 28, 2013; Subject: Docket No. 50-362, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 3 (ADAMS Accession No. ML13183A391)
 - (2) Letter from P. T. Dietrich (SCE) to Document Control Desk (NRC) dated July 22, 2013; Subject: Docket No. 50-361, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 2 (ADAMS Accession Number ML13204A304)
 - (3) Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated September 23, 2014; Subject: Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Units 2 and 3, Post-Shutdown Decommissioning Activities Report (ADAMS Accession No. ML14269A033)
 - (4) Letter from D. M. Gillen (NRC) to H. B. Ray (SCE) dated September 22, 2004; Subject: San Onofre Nuclear Generating Station, Unit 1 – Issuance of Amendment Upon Transfer of All Spent Fuel Storage From the Spent Fuel Pool Into Dry Cask Storage (TAC No. L52616)

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) hereby submits license amendment applications 225 to DPR-13 for San Onofre Nuclear Generating Station (SONGS) Unit 1, 272 to operating license NPF-10 for SONGS Unit 2 and license amendment 257 to operating license NPF-15 for SONGS Unit 3. These License Amendment Requests consist of Proposed Change Number (PCN)-611. PCN-611 would revise the Operating License and associated Technical Specifications (TSs) to reflect removal of all spent nuclear fuel from the SONGS Units 2 and 3 Spent Fuel Pools (SFP) and its transfer to dry cask storage within an Independent Spent Fuel

NM5301
NM5326
NRR
NM55

Storage Installation (ISFSI). The proposed changes would also make conforming changes to the Unit 1 TS and combine them with the Units 2 and 3 TS.

By letters dated June 28, 2013 (Reference 1) and July 22, 2013 (Reference 2), SCE submitted a certification of permanent removal of fuel from the reactor vessels for SONGS Units 2 and 3, pursuant to 10 CFR 50.82(a)(1)(ii). Therefore, the 10 CFR Part 50 licenses for SONGS Units 2 and 3 no longer authorize operation of the reactors or emplacement or retention of fuel into the reactor vessels. The Post-Shutdown Decommissioning Activities Report (PSDAR) for SONGS Units 2 and 3 dated September 23, 2014 (Reference 3), documented that SCE expects to have all spent fuel transferred to the ISFSI in 2019 (with a potential early finish of mid-2018). In support of this condition, the SONGS Units 2 and 3 licenses and associated TSs are being proposed for revision for consistency with a facility configuration with all spent nuclear fuel in dry storage within an ISFSI.

In addition, SONGS Unit 1 has been permanently shut down since 1993. By letter dated September 22, 2004 (Reference 4), the NRC approved TS to reflect transfer of all Unit 1 spent fuel into dry storage within an ISFSI. This submittal proposes additional changes to the Unit 1 TS to make them consistent with the proposed Units 2 and 3 TS. The proposed amendments also combine the Unit 1 TS with the Units 2 and 3 TS to create a single document.

Enclosure 1 to this letter contains a description, technical analysis, significant hazards determination, and environmental considerations evaluation for the proposed amendments. Attachments 1, 2 and 3 to Enclosure 1 contain marked-up TS pages (TS sections that are deleted in their entirety are identified as such, but the associated deleted pages are not included in the Attachments). There are no TS Bases pages associated with the proposed TSs.

As discussed in this submittal, the remaining design basis accidents and transients analyzed in Chapter 15 of the SONGS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) are either 1) no longer applicable for the condition where all spent nuclear fuel is transferred to dry cask storage within an ISFSI, or 2) do not rely on Structures, Systems or Components (SSCs) or parameter limits described in the current TSs. There are no remaining design basis accidents or transients in Chapter 8 of the Unit 1 Defueled Safety Analysis Report (DSAR).

SCE has determined that there is no significant hazard consideration associated with the proposed change and that the change is exempt from environmental review pursuant to 10 CFR 51.22(c)(12).

SCE requests approval of these amendment applications by November 30, 2017. Once approved, the amendment will be implemented within 60 days following SCE's submittal of a written certification to the NRC that all spent nuclear fuel assemblies have been transferred out of the SFP and placed in storage within the ISFSI.

In accordance with 10 CFR 50.91(b), SCE is notifying the State of California of this request for license amendment by providing a copy of this letter and its enclosures.

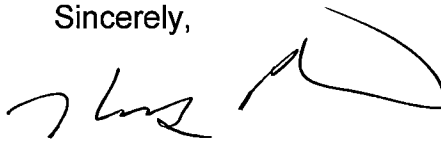
There are no new regulatory commitments in this letter or the Enclosure.

Should you have any questions, or require additional information, please contact Mr. Jim Kay at (949) 368-7418.

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

Executed on 12/15/2016
(Date)

Sincerely,

A handwritten signature in black ink, appearing to read "S. Y. Hsu", followed by a large, stylized flourish or scribble.

Enclosures:

PCN-611 with Attachments

cc: K. Kennedy, Regional Administrator, NRC Region IV
M. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch

ENCLOSURE

Evaluation of the Proposed Amendment

PCN-611

License Amendment Request (LAR) for ISFSI-only Technical Specifications

- 1.0 Summary Description
- 2.0 Proposed Change
- 3.0 Units 2 and 3 Technical Analysis
- 4.0 Units 2 and 3 Summary
- 5.0 Unit 1 Technical Analysis
- 6.0 Unit 1 Summary
- 7.0 Regulatory Analysis
 - 5.1 No Significant Hazards Consideration
 - 5.2 Applicable Regulatory Requirements and Criteria
 - 5.3 Precedent
 - 5.4 Conclusion
- 8.0 Environmental Consideration
- 9.0 References

Attachments:

- 1. Proposed Units 2 and 3 Technical Specification Mark-up Pages
- 2. Proposed Unit 1 Technical Specification Mark-Up Pages
- 3. Proposed Units 1, 2 and 3 Clean-Typed Pages

EVALUATION OF THE PROPOSED AMENDMENT **ISFSI-ONLY TECHNICAL SPECIFICATIONS**

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) requests an amendment to Facility Operating License Numbers DPR-13, NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS) Units 1, 2 and 3. The proposed amendments would revise the Operating Licenses and associated Technical Specifications (TS) to reflect removal of all spent nuclear fuel from the Units 2 and 3 Spent Fuel Pools (SFP) and its transfer to dry cask storage within the onsite Independent Spent Fuel Storage Installation (ISFSI). Unit 1 has had all spent fuel removed from the SFP since 2004.

By letters dated June 28, 2013 (Reference 1) and July 22, 2013 (Reference 2), SCE submitted a certification of permanent removal of fuel from the reactor vessels for SONGS Units 2 and 3, pursuant to 10 CFR 50.82(a)(1)(ii). Therefore, the 10 CFR Part 50 licenses for SONGS Units 2 and 3 no longer authorize operation of the reactors or emplacement or retention of fuel into the reactor vessels. The Post-Shutdown Decommissioning Activities Report (PSDAR) for SONGS Units 2 and 3 dated September 23, 2014 (Reference 3), documented that SCE expects to have all spent fuel transferred to the ISFSI in 2019. In support of this condition, the SONGS Units 2 and 3 licenses and associated TSs are being proposed for revision, in accordance with 10CFR 50.36(c)(6), for consistency with a facility configuration with all spent nuclear fuel in dry storage within the onsite ISFSI at SONGS using casks certified for use under a general 10 CFR 72 license.

The existing SONGS Units 2 and 3 TSs contain Limiting Conditions for Operation (LCOs) that provide for appropriate functional capability of equipment required for safe storage and management of irradiated fuel with fuel stored in a SFP. As such, the existing TSs provide a level of control in excess of that needed for safe storage and management of irradiated fuel with fuel stored in an ISFSI. The majority of the existing TSs are only applicable when irradiated fuel assemblies are within the SFP. Once all spent fuel assemblies have been transferred to the ISFSI, all remaining LCOs (and associated Surveillance Requirements (SRs)) will no longer be applicable and are being proposed for deletion. The TSs being proposed reflect the removal of all spent fuel from the SFP. The proposed changes will result in TSs that will be applicable to SONGS after the last spent fuel assembly has been removed from the SFP and placed within the ISFSI.

In addition, SONGS Unit 1 has been permanently shut down since 1993 and is in the decommissioning phase. Above-ground structures have been dismantled. Unit 1 fuel is stored in the ISFSI and in the GE-Hitachi Morris facility. By letter dated September 22, 2004 (Reference 4), the NRC approved TS to reflect transfer of all Unit 1 spent fuel into dry storage within an ISFSI. This submittal proposes additional changes to the Unit 1 TS to make them consistent with the proposed Units 2 and 3 TS. The proposed amendments also combine the Unit 1 TS with the Units 2 and 3 TS to create a single document.

There are no other pending license amendment requests associated with TSs currently docketed for SONGS. Therefore, no disposition of other TS changes, as they relate to this license amendment request, is needed.

2.0 PROPOSED CHANGE

As the changes to the Unit 1 TS are being made solely to provide consistency with the proposed Units 2 and 3 License and TS, Units 2 and 3 changes and justifications will be discussed first.

SONGS Units 2 and 3 changes:

The proposed amendment would modify the SONGS Units 2 and 3 licenses for consistency with the condition of all irradiated fuel in dry storage within the onsite Independent Spent Fuel Storage Installation (ISFSI) at SONGS using casks certified for use under a general 10 CFR 72 license. The amendment would also revise SONGS Units 2 and 3 TSs to eliminate operational requirements and certain design requirements involving storage of spent fuel that will no longer be applicable following the transfer of the last spent fuel assembly from the SFP to the ISFSI.

A new TS design requirement is being added that prohibits storage of spent fuel in the SFP.

The proposed changes to the TSs also involve relocating administrative requirements to either the SONGS Decommissioning Quality Assurance Program (DQAP) or to the SONGS Units 2 and 3 Licensee Controlled Specifications (LCS), and subsequently controlling them in accordance with 10 CFR 50.54(a) and 10 CFR 50.59, respectively. This relocation is being proposed pursuant to the criteria contained in 10 CFR 50.36 and in accordance with recommendations contained in NRC Administrative Letter 95-06.

The proposed changes to the Facility Operating License are as follows:

- Eliminate Unit 2 License Condition (LC) 2.C.(26) and Unit 3 LC 2.C.(27) related to mitigation strategy.
- Eliminate Unit 2 LC 2.C.(28) and Unit 3 LC 2.C.(28), related to an aging-management program for long-lived passive structures and components.

SONGS Unit 1 changes

The Unit 1 License and TS were previously revised by Reference 4 to reflect the condition that all Unit 1 spent fuel has been removed from the Unit 1 SFP. The changes proposed here provide consistency with the Units 2 and 3 proposed changes by deleting remnants of requirements that are no longer applicable, relocating administrative requirements to the DQAP and the SONGS LCS, adding a new design requirement that prohibits storage of spent fuel in the SFP, and combining the Unit 1 TS with the Units 2 and 3 TS.

There are no proposed changes to the Unit 1 License as part of this amendment request.

General Analysis Applicable to Proposed Change

SCE is in the process of preparing for the decommissioning of SONGS Units 2 and 3. In support of this activity, the spent fuel will be transferred from the SFP to the ISFSI. The proposed changes to the SONGS Units 2 and 3 TSs reflect the removal of all the spent fuel from the SFP. With irradiated spent fuel assemblies having been removed from the SFP, the design bases for spent fuel storage in the pool and the design basis accident for fuel handling are no longer applicable.

The SONGS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR), Chapter 15, Accident Analyses, currently addresses the design basis accidents (DBA) and transient scenarios applicable to SONGS Units 2 and 3 in the permanently defueled condition with irradiated fuel stored in the SFP. The majority of these postulated accidents are predicated on spent fuel being stored in the SFP. However, upon transfer of all irradiated fuel to storage in the ISFSI, the accident scenarios predicated on spent fuel storage in the SFP are no longer possible. The remaining accidents do not rely upon TS requirements for prevention or mitigation. With all of the SONGS 1 operating plant above-ground structures having been demolished and removed, and all Unit 1 spent fuel having been removed from the SFP, there are no remaining design basis accidents or transients in Chapter 8 of the Unit 1 Defueled Safety Analysis Report (DSAR).

The ISFSI is a passive system that does not rely on electrical power for heat transfer. With removal of the spent fuel from the SFP, there are no remaining spent fuel assemblies to be monitored and there are no credible spent fuel related accidents that require actions of a Certified Fuel Handler (CFH), Shift Manager, or a Certified Operator to prevent occurrence or mitigate the consequences.

SCE plans to use a decommissioning method called DECON (immediate dismantling), in which the equipment, structures, and portions of the facility and site that contain radioactive contaminants are promptly removed and/or decontaminated to a level that permits termination of the license after cessation of operations. Administrative controls that are required to be in place when decontamination and dismantlement activities of radioactive systems, structures, and components are being performed are designed to minimize the likelihood of an off-normal or accident event, and thereby the consequences of such an event. The proposed changes do not have an adverse impact on the remaining decommissioning activities or any of their postulated consequences.

The spent fuel will be stored in an ISFSI until it is shipped off site in accordance with the schedules described in the PSDAR and the Irradiated Fuel Management Plan (IFMP).

During decommissioning (with all spent fuel in dry storage within an ISFSI), no plant systems are relied upon for cooling of the assemblies in spent fuel storage. In this condition there are no credible accidents whose prevention or mitigation would need to be addressed by plant TSs. The spent fuel storage canisters used in the ISFSI are subject to their own Certificate of Compliance and associated storage canister TSs.

A list of the UFSAR Chapter 15 DBAs is provided in Section 5.2, "Applicable Regulatory Requirements/Criteria," of this submittal. There are no accident scenarios that apply to the condition with all spent fuel stored in dry casks within an ISFSI that also rely on SSCs or parameters described in the TSs. Therefore, a significant reduction in the requirements in SONGS Units 2 and 3 is appropriate to reflect the condition with all spent fuel stored in dry casks within an ISFSI. The Unit 1 TS, which have previously been revised to reflect removal of all fuel from the SFP, are proposed to be revised for consistency with the proposed Units 2 and 3 TS. In addition, the Unit 1 TS are proposed to be combined with the Units 2 and 3 TS.

The definition of safety-related structures, systems, and components (SSCs) in 10 CFR 50.2, "Definitions," states that safety-related SSCs are those relied on to remain functional during and following design basis events to assure:

1. The integrity of the reactor coolant boundary;
2. The capability to shutdown the reactor and maintain it in a safe shutdown condition; or,
3. The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in 10 CFR 50.34(a)(1) or 100.11.

The first two criteria (integrity of the reactor coolant pressure boundary and safe shutdown of the reactor) are not applicable to a plant in a permanently defueled condition. The third criterion is related to preventing or mitigating the consequences of accidents that could result in potential offsite exposures exceeding limits. However, after all spent fuel assemblies have been transferred to the ISFSI, there are no longer any SSCs at SONGS Units 1, 2 and 3 that are required to be relied upon for accident mitigation. Therefore, with no fuel stored in the SFP, none of the SSCs at SONGS Units 1, 2 and 3 meet the definition of a safety-related SSC as stated in 10 CFR 50.2.

10 CFR 50.36, "Technical Specifications," promulgates the regulatory requirements related to the content of TSs. As detailed in subsequent sections of this proposed amendment, this regulation lists four criteria to define the scope of equipment and parameters that must be included in TSs. A discussion of the applicability of these four criteria in the permanently defueled condition with all fuel removed from the SFP is provided in Section 5.2, "Applicable Regulatory Requirements/Criteria," of this submittal. In a permanently defueled condition with all spent fuel in dry storage within an ISFSI, the scope of equipment and parameters that need be included in the SONGS Units 1, 2 and 3 TSs is limited to a description of the design features and high radiation area administrative controls.

2.1 Technical Specifications

The following tables provide a summary of which TSs are being deleted in their entirety and which TSs are being revised consistent with a plant configuration where all spent fuel is located within an ISFSI. The details of, and justification for, the proposed changes follow in subsequent sections (arranged by Unit and TS Section).

U 2/3 TS Being Deleted	U 2/3 TS Being Revised/Maintained
1.0 USE AND APPLICATION	
1.1 Definitions	
1.2 Logical Connectors	
1.3 Completion Times	
1.4 Frequency	
3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY	
3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY	
3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY	
3.1 PLANT SYSTEMS	
3.1.1 Fuel Storage Pool Water Level	
3.1.2 Fuel Storage Pool Boron Concentration	
3.1.3 Spent Fuel Assembly Storage	
4.0 DESIGN FEATURES	
4.1 Site	
	4.3 Fuel Storage
5.0 ADMINISTRATIVE CONTROLS	
5.1 Responsibility	
5.2 Organization	
5.3 Facility Staff Qualifications	
5.4 Technical Specifications (TS) Bases Control	
5.5 Procedures, Programs and Manuals	
5.6 (Previously Deleted)	
5.7 Reporting Requirements	
	5.8 High Radiation Area

The Units 2 and 3 TS Table of Contents is being revised accordingly.

The corresponding Units 2 and 3 TS Bases are also being deleted to reflect the proposed changes.

U 1 TS Being Deleted	U 1 TS Being Revised/Maintained
D1 Introduction	
D1.1 Definitions	
D2.0 SAFETY LIMITS (Previously Deleted)	
D3.0 LIMITING CONDITIONS FOR OPERATION (LCO) (Previously Deleted)	
D4.0 SURVEILLANCE REQUIREMENTS (Previously Deleted)	
D5.0 DESIGN FEATURES	
D5.1 Site Description	
D5.2 Previously Deleted	
	4.3 Fuel Storage (new specification renumbered for consistency with U2/3)
D6.0 ADMINISTRATIVE CONTROLS	
D6.1 Responsibility	
D6.2 Organization	
D6.3 Unit Staff Qualifications	
D6.4 Training	
D6.5 Review and Audit (Previously Deleted)	
D6.6 Reportable Event Action	
D6.7 Previously Deleted	
D6.8 Procedures and Programs	
D6.9 Reporting Requirements	
D6.10 Previously Deleted	
D6.11 Radiation Protection Program	
	D6.12 High Radiation Area
D6.13 Process Control Program (PCP)	
D6.14 Offsite Dose Calculation Manual (ODCM)	
D6.15 Environmental Protection	

The Unit 1 TS Table of Contents is being revised accordingly and combined with the Units 2 and 3 TS Table of Contents.

The Unit 1 TS contain a title page that states the following:

“APPENDIX A

Any changes made to the San Onofre Nuclear Generating Station, Unit 1 Technical Specifications will be authorized by the Nuclear Regulatory Commission. All changes to these Technical Specifications are indicated by a vertical line in the right-hand margin. The length of the line shows the extent of the changed material.

The amendment numbers assigned by the NRC appear in the lower right-hand corner of the page. In general, the highest amendment number is associated with the change bars on each page.”

This Title page is being proposed for deletion. The information regarding authority for making changes is enforced by 10 CFR 50.59(c)(1). The information regarding page marking and amendment numbers is administrative information regarding how TS are maintained and have no impact on safe operation of the SONGS facility.

The Unit 1 TS Bases have been previously deleted, so no additional changes are required.

2.2 Facility Operating License

This section describes the proposed changes to the SONGS Facility Operating Licenses and the justification for each change.

Units 2 and 3:

License Section 1, Commission Findings

Section 1 of the license contains historical conclusions determined by the Commission during past licensing activities that are informational in nature. Therefore, no changes are being proposed to this section of the license.

License Condition 2.C.(26) for Unit 2 and 2.C.(27) for Unit 3

2.C(26)/(27) ~~Mitigation Strategy License Condition~~

~~Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:~~

- ~~(a) Fire fighting response strategy with the following elements:
 1. Pre-defined coordinated fire response strategy and guidance
 2. Assessment of mutual aid fire fighting assets
 3. Designated staging areas for equipment and materials
 4. Command and control
 5. Training of response personnel~~
- ~~(b) Operations to mitigate fuel damage considering the following:
 1. Protection and use of personnel assets
 2. Communications
 3. Minimizing fire spread
 4. Procedures for implementing integrated fire response strategy
 5. Identification of readily available pre-staged equipment
 6. Training on integrated fire response strategy
 7. Spent fuel pool mitigation measures~~
- ~~(c) Actions to minimize release to include consideration of:
 1. Water spray scrubbing
 2. Dose to onsite responders~~

This section is proposed for deletion in its entirety. After all spent fuel is stored within the ISFSI, the mitigation strategy license condition is no longer required.

The NRC issued this license condition on July 26, 2007, to incorporate the requirements for the Interim Compensatory Measures (ICM) Order EA-02-026, Section B.5.b mitigation strategies (dated February 25, 2002). Subsequently, 10 CFR 50.54(hh)(2) became effective on May 26, 2009. This section provides mitigation strategies and response procedure requirements for loss of large areas of the plant due to explosions or fire. However, as stated in 10 CFR 50.54(hh)(3), this section does not apply to a defueled reactor that has submitted the certification for permanent removal of fuel under 10 CFR 50.82(a).

On November 28, 2011, the NRC issued a letter that rescinded Item B.5.b of the ICM Order EA-02-26. Therefore, neither the ICM Order nor 10 CFR 50.54(hh) continue to apply to SONGS Units 2 and 3.

This paragraph will read as follows.

2.C.(26)/27 Deleted.

License Condition 2.C.(28) for Unit 2 and 2.C.(29) for Unit 3

2.C(28)/(29) ~~Prior to February 16, 2021, if all spent fuel has not been removed from the Unit 2 spent fuel pool, an aging management program shall be submitted for NRC approval. The scope of the program shall include those long-lived, passive structures and components that are needed to provide reasonable assurance of the safe condition of the spent fuel in the spent fuel pool. Once approved, the program shall be described in the Updated Final Safety Analysis Report and shall remain in effect for Unit 2 until such time that all spent fuel has been removed from the Unit 2 spent fuel pool.~~

After the SFP is unloaded and all spent fuel is stored within the ISFSI, there is no reliance on long-lived, passive structures at SONGS Units 2 and 3 that are needed to provide reasonable assurance of the safe condition of the spent fuel and hence, no need for an aging management program for long-lived passive structures and components. Furthermore, this license condition was predicated on spent fuel assemblies not having been removed from the SFP by February 16, 2021. Because this proposed amendment will not be implemented until after the date that the transfer of spent fuel from the SFP to the ISFSI is complete, License Conditions 2.C.(28/29) may be deleted.

This paragraph will read as follows.

2.C.(28)/29 Deleted.

Unit 1 License Changes:

No changes are proposed for the Unit 1 Facility Operating License.

3.0 UNITS 2 and 3 TECHNICAL ANALYSIS

and

4.0 UNITS 2 and 3 SUMMARY

The following portion of this license amendment request contains a summary and technical justification for the proposed changes to the Units 2 and 3 TSs Sections 1, 3, 4 and 5 (TS Section 2 was previously deleted).

A combined chapter, containing a separate description, the proposed change, technical analysis, and summary of the change is provided separately for each TS section. These individual chapters combine to constitute Parts 3.0 and 4.0 of this license amendment request.

For grouping purposes the description, proposed change, technical analysis, and summary of the change for each TS section is labeled as follows.

- Txx.1 Description
- Txx.2 Proposed Change
- Txx.3 Technical Analysis
- Txx.4 Summary

For the labels above, the numerical suffix “1” corresponds to “Description,” the suffix “2” corresponds to “Proposed Change,” the suffix “3” corresponds to “Technical Analysis,” and the suffix “4” corresponds to “Summary.”

The “xx” is a numerical designator that corresponds to the associated TS section (e.g., T3.1 would correspond to the “Description” for TS Section 3, whereas T31.3 would correspond to the “Technical Analysis” for TS Section 3.1).

The “**General Analysis Applicable to Proposed Change**” documented in Section 2.0, “Proposed Change,” above, is also applicable to the following proposed TS changes.

► TS SECTION 1.0, USE AND APPLICATION ◀

T1.1 DESCRIPTION

The existing TS Section 1.0, "Use and Application," contains the rules of usage for the TSs. This section is divided into the following four subsections.

- 1.1 Definitions – Defines terms used and applicable throughout the TSs and Bases.
- 1.2 Logical Connectors – An explanation of the logical connectors used to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies.
- 1.3 Completion Times – Establishes the Completion Time convention and provides guidance for its use.
- 1.4 Frequency – Defines the proper use and application of Frequency requirements.

Because storage of fuel in an ISFSI does not rely on plant systems or activities addressed by TSs, the requirements of this section will no longer apply (as discussed below) and are being proposed for deletion in their entirety.

T1.2 PROPOSED CHANGE

TS Section 1.0, USE AND APPLICATION

All TSs in Section 1.0 are being deleted in their entirety, as identified in the table below. Justification for deletion of these TSs are as further described below.

TS Being Deleted	TS Being Revised
1.0 USE AND APPLICATION	
1.1 Definitions	
1.2 Logical Connectors	
1.3 Completion Times	
1.4 Frequency	

There are no corresponding TS Bases sections associated with this TS section.

T1.3 TECHNICAL ANALYSIS

TS Section 1.1, Definitions

TS 1.1, "Definitions," provides defined terms that are applicable throughout the TSs and TSs Bases. After transfer of spent fuel from the SFP to the ISFSI is complete, there will no longer be any applicable LCOs or SRs in the SONGS Units 2 and 3 TSs. As such, the definitions described below will no longer be needed. Therefore, deleting these definitions from the TSs effective after the spent fuel transfer from the SFP to the ISFSI is acceptable. The following

definitions are being proposed for deletion because they will no longer have relevance to the plant TSs after all fuel is removed from the SFP and stored in an ISFSI.

Definitions Being Deleted

<u>Term</u>	<u>Definition Being Deleted (summarized)</u>
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
CERTIFIED FUEL HANDLER	A CERTIFIED FUEL HANDLER is an individual who complies with provisions of the CERTIFIED FUEL HANDLER training program required by TS 5.3.2.
OPERABLE - OPERABILITY	A system, subsystem, train, component, or device shall be OPERABLE when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).

TS Section 1.2, Logical Connectors

TS 1.2, "Logical Connectors," contains an explanation of the logical connectors used to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies throughout the TSs.

TS Section 1.2 is being proposed for deletion in its entirety because all TSs sections that contain Conditions, Required Actions, Completion Times, Surveillances, and Frequencies are also being deleted. As such, logical connectors will no longer appear in the TSs and the section that describes them may be deleted.

TS Section 1.3, Completion Times

TS 1.3, "Completion Times," establishes the Completion Time convention throughout the TSs and provides guidance for its use. The Completion Time is the amount of time allowed for completing a Required Action.

TS Section 1.3 is being proposed for deletion in its entirety because all TSs sections that contain Required Actions and Completion Times are also being deleted. As such, Completion Times will no longer appear in the TSs and the section that describes them may be deleted.

TS Section 1.4, Frequency

TS 1.4, "Frequency," defines the proper use and application of Frequency requirements throughout the TSs. Each Surveillance Requirement has a specified Frequency, in which the Surveillance must be met in order to meet the associated LCO.

TS Section 1.4 is being proposed for deletion in its entirety because all TSs sections that contain Surveillances and Frequencies are also being deleted. As such, Frequency will no longer appear in the TSs and the section that describes it may be deleted.

T1.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

TS Section 1.0, "Use and Application," does not contain applicability requirements. As such, all parts of this section can be conservatively defined as being applicable at all times.

All Irradiated Fuel Stored in an Independent Spent Fuel Storage Installation

Since TS Section 1.0 does not apply in the condition in which all spent fuel is removed from the SFP and stored in the onsite ISFSI, the individual TSs contained therein are not needed. As such, they may be deleted in their entirety with no impact on continued safe storage and maintenance of spent fuel in the ISFSI.

Conclusion

Deleting all TSs in Section 1.0 is acceptable.

**► TS SECTION 3.0, LIMITING CONDITION FOR OPERATION APPLICABILITY ◀
SURVEILLANCE REQUIREMENT APPLICABILITY**

T3.1 DESCRIPTION

The existing TS Section 3.0, "Limiting Condition for Operation (LCO) Applicability," and "Surveillance Requirement (SR) Applicability," contains general requirements applicable to all Specifications.

Because storage of spent fuel in an ISFSI does not rely on plant systems or activities addressed by TSs, all TSs sections that contain LCOs and SRs are being deleted. As such, the requirements of this section will no longer apply and are being proposed for deletion in their entirety.

T3.2 PROPOSED CHANGE

**TS Section 3.0, LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY;
SURVEILLANCE REQUIREMENT (SR) APPLICABILITY**

All TSs in Section 3.0 are being deleted in their entirety, as identified in the table below. Proposed deletion of these TSs (including the LCOs being deleted) are as further described below.

TS Being Deleted	TS Being Revised
3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY	
3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY	
3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY	

The corresponding TS Bases sections are also being deleted to reflect this change.

T3.3 TECHNICAL ANALYSIS

TS 3.0, LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

TS 3.0, "Limiting Condition for Operation (LCO) Applicability," consists of LCOs 3.0.1 and 3.0.2. These LCOs establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any applicable LCOs or SRs. As such, the LCOs described below will no longer be needed. Therefore, deleting these LCOs from the TSs effective after the spent fuel transfer from the SFP to the ISFSI is acceptable. The following LCOs are being proposed for deletion because they no longer have relevance to the plant TSs after all spent fuel is removed from the SFP and stored in the onsite ISFSI.

LCOs Being Deleted

- LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the specified conditions of the Applicability statement of each Specification).
- LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met.

LCOs 3.0.1 and 3.0.2 are being proposed for deletion in their entirety. These two LCOs are no longer needed since all remaining TSs to which they apply are being proposed for deletion. Therefore, the proposed deletion of LCOs 3.0.1 and 3.0.2 is acceptable.

TS 3.0, SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

TS 3.0, "Surveillance Requirement (SR) Applicability," consists of SR 3.0.1 through SR 3.0.4. SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any applicable LCOs or SRs. As such, the SRs described below will no longer be needed. Therefore, deleting these SRs from the TSs effective after the spent fuel is transferred from the SFP to the ISFSI is acceptable. The following SRs are being proposed for deletion because they no longer have relevance to the plant TSs after all spent fuel is removed from the spent fuel and stored in the ISFSI.

SRs Being Deleted

- SR 3.0.1 establishes the requirement that SRs must be met during the specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits.
- SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.
- SR 3.0.3 provides the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance requirement has not been completed within the specified Frequency.
- SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a specified condition in the Applicability.

SRs 3.0.1, 3.0.2, 3.0.3, and 3.0.4 are being proposed for deletion in their entirety.

These four SRs are no longer needed since all remaining TSs to which they apply are being proposed for deletion. Therefore, the proposed deletion of SRs 3.0.1, 3.0.2, 3.0.3, and 3.0.4 is acceptable.

T3.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

TS Section 3.0, "LCO Applicability," and "Surveillance Requirement (SR) Applicability," does not contain applicability requirements. As such, all parts of this section can be conservatively defined as being applicable at all times.

All Spent Fuel Stored in an Independent Spent Fuel Storage Installation

TS Section 3.0 does not apply in the condition where all spent fuel has been removed from the SFP and is stored in an ISFSI. Since the TSs to which TS section 3.0 applies are being proposed for deletion, the TS Section 3.0 requirements are no longer needed. As such, they may be deleted in their entirety with no impact on continued safe storage and maintenance of spent fuel in the ISFSI.

Conclusion

Deleting all TSs in Section 3.0 is acceptable.

► **TS SECTION 3.1, PLANT SYSTEMS** ◀

T31.1 DESCRIPTION

The existing TS in Section 3.1, "Plant Systems" (TSs 3.1.1, 3.1.2, and 3.1.3), contain LCOs that provide for appropriate functional capability of plant equipment required for safe maintenance and storage of fuel assemblies in the SFP.

After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any spent fuel assemblies in the SFP. As such, TSs 3.1.1, 3.1.2, and 3.1.3 (along with their respective LCOs) will no longer be applicable. Therefore, deleting these TSs effective after all spent fuel has been transferred from the SFP to the ISFSI is acceptable. All TSs in Section 3.1 are being proposed for deletion because they have no relevance to, and no longer apply to, the storage of spent fuel assemblies in an ISFSI.

T31.2 PROPOSED CHANGE

TS Section 3.1, Plant Systems

All TSs in Section 3.1 are being deleted in their entirety, as identified in the table below

TS Being Deleted	TS Being Revised
3.7 PLANT SYSTEMS	
3.1.1 Fuel Storage Pool Water Level	
3.1.2 Fuel Storage Pool Boron Concentration	
3.1.3 Spent Fuel Assembly Storage	

The corresponding TS Bases sections are also being deleted to reflect this change.

T31.3 TECHNICAL ANALYSIS

Section 3.1 TS That Are Not Applicable When All Fuel Stored in ISFSI

TSs 3.1.1, 3.1.2, and 3.1.3 do not currently apply when no fuel assemblies are in the SFP.

After all spent fuel has been removed from the SFP, there is no need to maintain spent fuel water level, verification of boron concentration, or SFP cooling. Safe load paths over the SFP are no longer necessary.

TS 3.1.1, "Fuel Storage Pool Water Level," specifies requirements to ensure that the minimum water level in the SFP meets the iodine decontamination factor assumptions used in the fuel handling accident (FHA) analysis of record. The specified water level shields and minimizes the

general area dose when the storage racks are filled to their maximum capacity. The water also provides shielding during the movement of spent fuel. TS 3.1.1 is applicable during movement of irradiated fuel assemblies in the SFP.

TS 3.1.2, "Fuel Storage Pool Boron Concentration," specifies requirements to ensure that the SFP boron concentration is ≥ 2000 ppm. The specified concentration of dissolved boron in the SFP preserves the assumptions used in the analyses of the potential criticality accident scenarios. This concentration of dissolved boron is the minimum required for fuel assembly storage and movement within the SFP. TS LCO 3.1.2 applies whenever fuel assemblies are stored in the SFP.

TS 3.1.3, "Spent Fuel Assembly Storage," specifies restrictions on the placement of fuel assemblies within the SFP, in accordance with various figures in the accompanying LCO to ensure the k_{eff} of the SFP will always remain <1.00 , assuming the pool to be flooded with unborated water, and ≤ 0.95 , assuming the pool to be flooded with borated water. TS LCO 3.1.3 applies whenever any fuel assembly is stored in Regions 1 and 2 of the SFP.

T31.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

TSs 3.1.1, 3.1.2, and 3.1.3 are related to assuring the appropriate functional capability of plant equipment required for safe storage and maintenance of spent fuel stored in the SFP. TSs 3.1.1, 3.1.2, and 3.1.3 are applicable when fuel assemblies are stored or moved in the SFP.

All Irradiated Fuel Stored in an Independent Spent Fuel Storage Installation

TSs 3.1.1, 3.1.2, and 3.1.3 do not apply when all spent fuel assemblies are removed from the SFP and stored in an ISFSI. Therefore, these three TSs will no longer be needed following the transfer of all fuel assemblies from the SFP to the ISFSI. As such, these three TSs may be deleted in their entirety with no impact on continued safe storage and maintenance of irradiated fuel in an ISFSI at SONGS Units 2 and 3.

LCOs that provide for appropriate functional capability of facility equipment required for safe maintenance and storage of fuel assemblies in the ISFSI are specified in the applicable ISFSI TSs.

Conclusion

Deleting TSs 3.1.1, 3.1.2, and 3.1.3 in Section 3.1 is acceptable.

► TS SECTION 4.0, DESIGN FEATURES ◀

T4.1 DESCRIPTION

The existing TS Section 4.0, "Design Features," contains descriptions and requirements for those features of the facility such as materials of construction and geometric arrangements which, if altered or modified, would have a significant effect on safety of the SFP and are not covered in the previous sections of the TSs.

After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any fuel assemblies in the SFP. As such, certain design features will have no relevance to, and no longer apply to, the storage of fuel assemblies in an ISFSI. Therefore, deleting these TSs effective after the last fuel transfer from the SFP to the ISFSI is acceptable.

Since this proposed amendment is premised on spent fuel no longer being stored in the SFP, a new design feature specification is being proposed stating that spent fuel shall not be stored in the SFP.

T4.2 PROPOSED CHANGE

TS Section 4.0, Design Features

TS being deleted is 4.1 and TS being retained and revised is 4.3 as further described below and shown in Attachments 1 and 3 (the currently existing design features description in TS 4.3 is being deleted and replaced with a new design feature specification).

Note: TS 4.2 was previously deleted.

TS Being Deleted	TS Being Revised
4.0 DESIGN FEATURES	
4.1 Site	
	4.3 Fuel Storage

There are no corresponding TS Bases sections associated with this TS section.

T4.3 TECHNICAL ANALYSIS

TS 4.1, Site

TS 4.1, "Site," provides a description and diagrams of the Exclusion Area Boundary (EAB) and the Low Population Zone (LPZ) for SONGS Units 2 and 3. This TS section is being deleted.

The minimum distance from the center line of the reactor containment to the site exclusion radius is based on requirements contained in 10 CFR 100.3 regarding reactor accident dose analyses. Likewise, the LPZ is based on requirements in 10 CFR 100.3 that the LPZ is an area immediately surrounding the exclusion area in which protective measures could be taken following a serious accident. Because the SONGS Units 2 and 3 Part 50 licenses no longer authorize emplacement or retention of fuel in the reactor vessel, these design features are no longer needed. As such, their description may be deleted.

The EAB will remain part of the SONGS licensing basis, but under licensee control. The EAB is described in the SONGS Units 2 and 3 UFSAR, Offsite Dose Calculation Manual (ODCM), and the ISFSI 72.212 evaluation (as the controlled area described in 10 CFR 72.106. Future changes to the EAB will be controlled by evaluations in accordance with 10 CFR 50.59, 10 CFR 20, and 10 CFR 72.48, as appropriate.

TS 4.3, Fuel Storage

TS Section 4.3, "Fuel Storage," provides a description and requirements regarding prevention of criticality of spent fuel in the SFP storage racks, prevention of SFP drainage, and spent fuel capacity limitations. All currently existing requirements in TS Section 4.3 are being deleted in their entirety.

After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any fuel assemblies in the pool. SCE has no plans to return spent fuel to the SFP after that time. Therefore, the design features associated with fuel storage in the SFP is no longer applicable and may be deleted. TS 4.3 also refers to requirements in Licensee Controlled Specification (LCS) 4.0.100, "Fuel Storage Patterns," including a specific date and revision number. LCS 4.0.100 includes a provision that no changes shall be made without NRC approval in conjunction with changes to TS 4.3.1. Following NRC approval of the proposed TSs changes in this submittal, LCS 4.0.100 will be deleted as part of implementation of the resulting amendment.

Because this proposed amendment is premised on spent fuel no longer being stored in the SFP, a new design feature specification is being proposed to be added to TS Section 4.3 stating that spent fuel shall not be stored in the SFP.

The new specification will read:

"Spent fuel shall not be stored in the SFP."

T4.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

TS Section 4.0, "Design Features," does not contain applicability requirements. As such, all parts of this section are conservatively assumed to be applicable at all times.

All Irradiated Fuel Stored in an Independent Spent Fuel Storage Installation

TS 4.1 is proposed for deletion to reflect the condition of all fuel assemblies stored in an ISFSI.

The existing TS Section 4.3 describes design features associated with fuel storage in the SFP. After all spent fuel is removed from the SFP the existing information in TS Section 4.3 is no longer applicable and may be deleted. Adding a new design feature stating that spent fuel shall not be stored in the SFP documents the premise on which this proposed amendment is based (i.e., spent fuel no longer being stored in the SFP).

Conclusion

Deleting TS 4.1 and adding the proposed design feature specification (regarding prohibition on spent fuel storage in the SFP) to TS 4.3, ensures appropriate requirements for the associated design features.

Deleting the currently existing (no longer applicable) design features in TS Section 4.3 is acceptable.

▶ **TS SECTION 5.0, ADMINISTRATIVE CONTROLS** ◀

T5.1 DESCRIPTION

The existing TS Section 5.0, "Administrative Controls," contains provisions relating to organization and management, qualifications, TS Bases Control, procedures, recordkeeping, reporting, and high radiation areas necessary to assure operation of the facility in a safe manner.

After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any fuel assemblies in the SFP. As such, the associated administrative controls will have no relevance to and no longer apply to the storage of fuel assemblies in an ISFSI. Therefore, deleting the associated TSs effective after the last fuel transfer from the SFP to the ISFSI is acceptable.

T5.2 PROPOSED CHANGE

TS Section 5.0, Administrative Controls

All TSs in Section 5.0, with the exception of TS 5.8, High Radiation Area, are being deleted in their entirety, as identified in the table below and as further described and as shown in Attachments 1 and 3. Pertinent information being deleted from TSs is being relocated to either the DQAP or the Licensee Controlled Specifications (LCS). TS 5.8 is being retained unchanged.

TS Being Deleted	TS Being Revised
5.0 ADMINISTRATIVE CONTROLS	
5.1 Responsibility	
5.2 Organization	
5.3 Facility Staff Qualifications	
5.4 Technical Specifications (TS) Bases Control	
5.5 Procedures, Programs and Manuals	
5.6 (Previously Deleted)	
5.7 Reporting Requirements	
	5.8 High Radiation Area

There are no corresponding TS Bases sections associated with this TS section.

T5.3 TECHNICAL ANALYSIS

NRC Administrative Letter 95-06 provides a discussion concerning the relocation of Technical Specification administrative controls to a Quality Assurance (QA) program. The NRC considers relocating these requirements to the quality assurance program acceptable because of the

controls imposed by 10 CFR 50, Appendix B, the existence of an NRC approved QA program, and the QA program change control process in 10 CFR 50.54(a). The SONGS Units 2 and 3 QA program is described in the Decommissioning Quality Assurance Program (DQAP).

AL 95-06 states that for the procedure review process, re-location should be to a QA plan that contains a commitment to process procedures and procedure changes in accordance with an accepted standard to ANSI N18.7. As part of NRC approval of the SONGS DQAP (Reference 5), the commitment to ANSI N18.7 was deleted. Re-location of site-specific TSs requirements regarding the establishment, implementation and maintenance of procedures to the QA plan remains acceptable because the change control process of 10 CFR 50.54(a) would still govern any future changes to these requirements, as described in the AL 95-06.

The LCS is incorporated by reference into Chapter 16, "Technical Specifications," of the UFSAR and therefore subject to the requirements of 10 CFR 50.59. Maintaining relocated requirements in accordance with the change control process in 10 CFR 50.59 provides adequate control based on the ISFSI-only status of the facility. With the transfer of the spent fuel to the ISFSI, the administrative controls pertaining to the safe storage of spent fuel within the SFP are no longer needed or applicable.

TS 5.1, Responsibility

TS 5.1, "Responsibility," provides a description and requirements regarding certain key operational management responsibilities.

Requirements Relocated to DQAP

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.~~

SCE is proposing to delete TS 5.1.2 in its entirety. The SM requirements in TS 5.1.2 are being eliminated. The requirements of TS 5.1.1 are being deleted from TS and relocated to the DQAP.

With removal of all of the spent fuel from the SFP, the need for the SM for spent fuel management no longer exists. The position of SM described in TS 5.1.2 is a holdover from the control room function of supervising multiple functions of an operating nuclear power plant. With the limited requirements for supervision of the passive fuel storage at the ISFSI or with respect to the decommissioning of the former power generation facility, the SM position is no longer required and the proposed deletion of TS 5.1.2 is acceptable. Therefore, Section 5.1.2, which provides a description of responsibility of the SM will be deleted from the TSs.

The remaining requirements of Section 5.1.1 related to the responsibilities of the corporate officer will be deleted from the TSs and relocated to the DQAP. Relocating these responsibilities to the DQAP is consistent with NRC Administrative Letter 95-06. Therefore, the proposed deletion of TS 5.1 is acceptable.

TS 5.2, Organization

TS 5.2, "Organization," provides a description and requirements regarding onsite and offsite organizations and facility staffing. Descriptions include lines of authority and staff responsibilities. Requirements include the associated TS Table 5.2.2-1, which specifies a minimum shift crew composition staffing requirement for CFHs and Certified Operators. TS 5.2 also specifies requirements for fuel handling operations and supervision.

Requirements Revised and Relocated to DQAP

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear fuel.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships, including the plant-specific titles of those personnel fulfilling the responsibilities for the positions delineated in these Technical Specifications, are documented in the SONGS 1 Defueled Safety Analysis Report (DSAR) or the SONGS 2 and 3 UFSAR.
- b. The corporate officer with direct responsibility for the plant shall be responsible for overall safe handling and storage of nuclear fuel and shall have control over those onsite activities necessary for safe handling and storage of the nuclear fuel.
- c. A specified corporate officer (or officers) shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure safe management of nuclear fuel.
- d. The individuals who train ~~CERTIFIED FUEL HANDLERS~~, and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

Retained portion relocated to DQAP

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. During such absences, no fuel movement or movement of heavy loads over storage racks containing fuel is permitted.
- 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 the storage racks containing fuel.

Table 5.2.2-1
Minimum Shift Crew Composition

POSITION	MINIMUM STAFFING
CERTIFIED FUEL HANDLER	-1*
Certified Operator	4

Note: The Certified Operator position may be filled by a CERTIFIED FUEL HANDLER.

* May be shared between Units 2 and 3.

SCE is proposing to delete TS 5.2.2 in its entirety. The associated Table 5.2.2-1 is also being deleted. The requirements of TS 5.2.1 are being deleted from TS and relocated to the DQAP, with the exception of the CFH trainer requirements in TS 5.2.1.d, which are being eliminated.

Section 5.2.1, "Onsite and Offsite Organizations," provides a general discussion of the site organization which assures safe facility operations and safety of the nuclear fuel. Section 5.2.1.b states that organizational responsibilities and relationships shall be documented in the UFSAR. SCE proposes to revise this section to include the SONGS Unit 1 DSAR to reflect combination of the Units 1, 2, and 3 TS (See Sections 5.0 and 6.0 of this submittal). Section 5.2.1.d provides requirements for organizational freedom of the CFH trainers, and the radiation protection and quality assurance personnel. SCE proposes to eliminate the portion of Section 5.2.1.d pertaining to certified fuel handler trainers. Following the transfer of all spent fuel to the

ISFSI, and the new TS 4.3 prohibition from storing fuel in the SFP, there will no longer be a need for certified fuel handlers; therefore this proposed deletion is acceptable.

The remainder of section 5.2.1 will be deleted from the TS and relocated to the DQAP to provide an equivalent description of the requirements for organizational freedom of the radiation protection and quality assurance personnel. Providing onsite and offsite organization descriptions in the DQAP is consistent with NRC Administrative Letter 95-06. Therefore, the proposed deletion and relocation are acceptable.

Section 5.2.2, "Facility Staff", currently specifies the organizations and positions for activities affecting the safe storage of irradiated fuel in the SFP. The DQAP addresses the necessary organizational requirements for SCE after all spent fuel has been transferred to ISFSI. Therefore, the deletion of TS 5.2.2 after the fuel has been moved from the SFP to the ISFSI will have no impact and is acceptable.

TS 5.3, Facility Staff Qualifications

TS 5.3, "Facility Staff Qualifications," provides a description and requirements regarding qualifications of the facility staff. It also specifies that an NRC approved training and retraining program for the CFH shall be maintained.

5.3 Facility Staff Qualifications

Requirements Relocated to DQAP

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except: a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

~~5.3.2 An NRC approved training and retraining program for the CERTIFIED FUEL HANDLERS shall be maintained.~~

SCE is proposing to delete TS 5.3.2 in its entirety. The requirements of TS 5.3.1 are being deleted from TS and relocated to the DQAP. Following the transition to ISFSI-only, the facility staff will be reduced from current levels. There will no longer be spent fuel assemblies in the SFP to be monitored and there are no credible accidents that require the actions of a Certified Fuel Handler, Shift Manager, or a Certified Operator to prevent occurrence or mitigate the consequences of an accident. As a result, these positions will be eliminated. SCE will apply those portions of ANSI N18.1-1971 or Regulatory Guide 1.8 that remain applicable to the reduced staffing that will remain on site.

TS 5.3.2 specifies requirements for a CFH training program. Following the transfer of all spent fuel to the ISFSI, and the new TS 4.3 prohibition from storing spent fuel in the SFP, there will no longer be a need for CFHs, which obviates the need for the associated training program. Therefore, this proposed deletion is acceptable.

TS 5.4, TS Bases Control Program

TS 5.4, "Technical Specifications Bases Control Program," provides a description and requirements regarding administration of written procedures.

~~5.4 — Technical Specifications (TS) Bases Control~~

~~5.4.1 — Changes to the Bases of the TS shall be made under appropriate administrative controls.~~

~~5.4.2 — Changes to the Bases may be made without prior NRC approval provided the changes do not require either of the following:~~

~~a. — A change in the TS incorporated in the license; or~~

~~b. — A change to the updated UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.~~

~~5.4.3 — The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.~~

~~5.4.4 — Proposed changes that meet the criteria of (a) or (b) above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC every 24 months.~~

TS 5.4, "Technical Specifications Bases Control Program," specifies the process for changes to the TSs Bases. Currently, the TSs Bases are all related to storage of spent fuel in the SFP, specifically the requirements in TSs 3.1.1, 3.1.2 and 3.1.3, which are being deleted as described above. Following transfer of all spent fuel to the ISFSI, the SFP will no longer be used for spent fuel storage. Since all the TSs Bases will be deleted, there will no longer be a need for a TS Bases Control Program. Therefore, the proposed deletion of TS 5.4 is acceptable.

TS 5.5, Procedures, Programs, and Manuals

TS 5.5, "Procedures, Programs and Manuals," provides a description and requirements regarding programs and manuals that are to be established, implemented, and maintained.

Retained portion relocated to
DQAP

5.5 Procedures, Programs, and Manuals

5.5.1 Procedures

5.5.1.1 Scope

Written procedures shall be established, implemented, and maintained covering the following activities:

- a. ~~The applicable procedures recommended in Regulatory guide 1.33, Revision 2, Appendix A, February 1978;~~
- b. Deleted.
- c. Quality assurance for effluent and environmental monitoring using the guidance in Regulatory Guide 4.15, Revision 1, 1979;
- d. Fire Protection Program implementation; and
- e. Programs, as specified in Specification 5.5.2.

Relocated to Licensee
Controlled Specifications

5.5.2 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.2.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from ...
- b. ...Radioactive Effluent Release Report required by Specification 5.7.1.2 and Specification 5.7.1.3

5.5.2.1.1 Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed...
- c. ...Shall be submitted to the NRC ... the change was implemented.

5.5.2.2 Deleted

5.5.2.3 Radioactive Effluent Controls Program

This program conforming to 10 CFR 50.36a provides for the control of radioactive effluents and for maintaining the doses...

- j. ...Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.2.4 Deleted

5.5.2.5 Deleted

5.5.2.6 Deleted

Relocated to Licensee
Controlled Specifications

5.5.2.7 Storage Tank Radioactivity Monitoring Program

This program provides controls for the quantity of radioactivity contained in unprotected outdoor liquid storage tanks...

...limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

~~The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Storage Tank Radioactivity Monitoring Program surveillance frequencies.~~

SCE is proposing to relocate TS 5.5, "Procedures, Programs and Manuals," to the Decommissioning Quality Assurance Program (DQAP) or the LCS, as appropriate.

SCE is proposing to relocate the requirements of TS 5.5.1, "Procedures," to the DQAP, except for TS 5.5.1.1.a, specifying procedures applicable to the safe storage of nuclear fuel recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February, 1978, which is to be eliminated.

The transfer of the administrative controls in TS 5.5.1 is consistent with the guidance in AL 95-06, and therefore, is acceptable.

The guidance in Regulatory Guide 1.33, Revision 2, Appendix A, addresses safety-related activities carried out during the operation phase of nuclear power plants, including wet storage of nuclear fuel in a SFP. Following the transfer of all spent fuel to the ISFSI, the SFP will no longer be used for spent fuel storage. Additionally, as discussed above, SCE is adding a limitation in TS 4.3, which prohibits storage of spent fuel in the SFP. After spent fuel storage is no longer allowed in the SFP, the specifications included in TS 5.5.1.1.a., would no longer be needed, so the proposed deletion is acceptable.

TS 5.5.2.1, "Offsite Dose Calculation Manual (ODCM)", currently specifies how to document, review, and approve changes to the ODCM. SCE proposes to delete this requirement from the TS and relocate it to the LCS. This requirement will be maintained in accordance with 10 CFR 50.59. Since the intent of this section is to ensure that the ODCM continues to meet the requirements of 40 CFR 190, 10 CFR 20, 10 CFR 50.36(a), and 10 CFR 50, Appendix I, and since this requirement will be maintained in the LCS, the relocated requirement will continue to be subject to regulatory controls. This change is consistent with similar relocations approved by NRC of former TSs requirements into an LCS. Therefore, the proposed deletion and relocation of the requirement are acceptable.

TS 5.5.2.2 has been previously deleted.

TS 5.5.2.3, "Radioactive Effluent Controls Program", currently specifies requirements for the control of radioactive effluents and for maintaining doses to the public from effluents as low as reasonably achievable (ALARA). SCE proposes to delete this requirement from the TS and relocate it to the LCS. The requirement for a Radioactive Effluent Controls Program will be maintained in accordance with 10 CFR 50.59. Since the intent of this section is to ensure that the Radioactive Effluent Controls Program continues to meet the requirements of 40 CFR 190, 10 CFR 20, 10 CFR 50.36(a), and 10 CFR 50, Appendix I, and since this requirement will be maintained in the LCS, the relocated requirement will continue to be subject to regulatory controls. This change is consistent with similar relocations approved by NRC of former TSs requirements into a Technical Requirements Manual (TRM) or LCS. Therefore, the proposed deletion and relocation of the requirement are acceptable.

TSs 5.5.2.4, 5.5.2.5, and 5.5.2.6 have been previously deleted.

Section 5.5.2.7, "Storage Tank Radioactivity Monitoring Program", currently provides controls for the quantity of radioactivity contained in unprotected outdoor liquid storage tanks. SCE proposes to delete these requirements from the TS and relocate them to the LCS. The requirement for a Storage Tank Radioactivity Monitoring Program will be maintained in accordance with 10 CFR 50.59. Since this requirement will be maintained in the LCS, the relocated requirement will continue to be subject to regulatory controls. This change is consistent with similar relocations approved by NRC of former TSs requirements into a TRM or LCS. Therefore, the proposed deletion and relocation of the requirement are acceptable.

TS 5.6, Deleted

TS. 5.6 has been previously deleted.

TS 5.7, Reporting Requirements

TS 5.7, "Reporting Requirements," provides a description and requirements regarding reports that are to be submitted in accordance with 10 CFR 50.4.

SCE is proposing to delete TS 5.7, "Reporting Requirements", from the TSs and relocate the requirements to the LCS in their entirety. The requirements are TS 5.7.1, "Routine Reports," TS 5.7.1.2, "Annual Radiological Environmental Operating Report", and TS 5.7.1.3, "Radioactive Effluent Release Report." The LCS is incorporated by reference into Chapter 16 of the UFSAR and therefore subject to the requirements of 10 CFR 50.59. Maintaining these relocated requirements in accordance with 10 CFR 50.59 provides adequate control based on the ISFSI-only status of the facility. Therefore, the proposed deletion and relocation of the requirements are acceptable.

TS 5.8, High Radiation Area

Revised and Retained

5.8 High Radiation Area

5.8.1 Each high radiation area as defined 10 CFR 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a ~~Radiation Exposure Permit (REP)~~Radiation Work Permit (RWP) or equivalent...

- c. ...An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable ~~REP~~RWP or equivalent.

...

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty, ~~or radiation protection supervisor, or his or her designee~~. Doors shall remain locked except during periods of access by personnel under an approved ~~REP~~RWP or equivalent that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the ~~REP~~RWP or equivalent, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3...

TS 5.8, "High Radiation Area," provides a description and requirements regarding controls applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR 20 (as provided in paragraph 20.1601(c) of 10 CFR 20). TS 5.8 will remain germane with all spent fuel stored in the ISFSI. As such, it is being revised as marked above and retained.

The change from "Radiation Exposure Permit (REP)" to "Radiation Work Permit (RWP)" reflects more commonly used language within the industry, and is an administrative change. In addition, the proposed changes allow an equivalent process to the RWP process in order to provide additional flexibility for future changes to the permitting process as the site moves through decommissioning. This change is acceptable because it is consistent with the description of the RWP process in NUREG-1432, Revision 4, "Standard Technical Specifications, Combustion Engineering Plants," TS 5.7, "High Radiation Area." This change is also consistent with the guidance of Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants." Section 2.2 of the Regulatory Guide, "Positive

Access Control,” states that nuclear power plants can institute appropriate positive access controls to high radiation areas through the use of RWPs *or an equivalent process* (emphasis added).

The change to allow a designee for the radiation protection supervisor provides additional flexibility as the site moves through decommissioning. This change is acceptable because it more closely aligns with the Standard Technical Specifications in NUREG-1432, Revision 4, TS 5.7, “High Radiation Area.”

T5.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

TS Section 5.0, Administrative Controls, does not contain applicability requirements. As such, all parts of this section are conservatively assumed to be applicable at all times.

All Irradiated Fuel Stored in an Independent Spent Fuel Storage Installation

TS Section 5.0 describes administrative controls associated with fuel storage in the SFP. After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any fuel assemblies in the SFP. However, there may continue to be high radiation areas in the facility. Therefore, with the exception of TS 5.8, “High Radiation Area,” this TS section is no longer required and may be deleted. Pertinent requirements will be relocated to either the DQAP or the LCS and controlled in accordance with 10 CFR 50.54(a) and 10 CFR 50.59, respectively. Appropriate administrative controls for spent fuel storage within an ISFSI are specified in the applicable ISFSI storage system TSs.

TS 5.8 will remain applicable following the complete transfer of spent fuel from the SFP to the ISFSI because high radiation areas may continue to exist in the facility. As such, it is being retained and revised to provide additional flexibility.

Conclusion

Deleting TSs 5.1, 5.2, 5.3, 5.4, 5.5, and 5.7 in their entirety and relocating the pertinent requirements discussed above to either the DQAP or LCS is acceptable.

Retaining TS 5.8, as revised, continues to ensure appropriate requirements for high radiation areas.

5.0 UNIT 1 TECHNICAL ANALYSIS

and

6.0 UNIT 1 SUMMARY

The following portion of this license amendment request contains a summary and technical justification for the proposed changes to the Unit TSs Sections 1, 4, 5, and 6 (TS Sections 2 and 3 were previously deleted).

A combined chapter, containing a separate description, the proposed change, technical analysis, and summary of the change is provided separately for each TS section. These individual chapters combine to constitute Parts 5.0 and 6.0 of this license amendment request.

For grouping purposes the description, proposed change, technical analysis, and summary of the change for each TS section is labeled as follows.

Txx.1 Description
Txx.2 Proposed Change
Txx.3 Technical Analysis
Txx.4 Summary

For the labels above, the numerical suffix "1" corresponds to "Description," the suffix "2" corresponds to "Proposed Change," the suffix "3" corresponds to "Technical Analysis," and the suffix "4" corresponds to "Summary."

The "xx" is a numerical designator that corresponds to the associated TS section (e.g., T3.1 would correspond to the "Description" for TS Section 3, whereas T31.3 would correspond to the "Technical Analysis" for TS Section 3.1).

The "**General Analysis Applicable to Proposed Change**" documented in Section 2.0, "Proposed Change," above, is also applicable to the following proposed TS changes.

► **TS SECTION D1, USE AND APPLICATION** ◀

T1.1 DESCRIPTION

The existing TS Section D1, "Introduction," contains the rules of usage for the TSs. This section has only one subsection.

D1.0 Definitions – Defines terms used and applicable throughout the TSs and Bases.

Because storage of fuel in an ISFSI does not rely on plant systems or activities addressed by TSs, the requirements of this section will no longer apply (as discussed below) and are being proposed for deletion in their entirety.

T1.2 PROPOSED CHANGE

TS Section D1, INTRODUCTION

All TSs in Section D1 are being deleted in their entirety, as identified in the table below. Justification for deletion of these TSs are as further described below.

TS Being Deleted	TS Being Revised
D1 INTRODUCTION	
D1.0 Definitions	

There are no corresponding TS Bases sections associated with this TS section.

T1.3 TECHNICAL ANALYSIS

TS Section 1.1, Definitions

TS 1.0, "Definitions," provides defined terms that are applicable throughout the TSs and TSs Bases. Based on the proposed changes to the Unit 1 TSs, these terms no longer appear in the TSs and may be deleted.

Definitions Being Deleted

<u>Term</u>	<u>Definition Being Deleted (summarized)</u>
MEMBERS OF THE PUBLIC	MEMBERS OF THE PUBLIC are those individuals who have no formal association with the plant
OFFSITE DOSE CALCULATION MANUAL	The OFFSITE DOSE CALCULATION MANUAL (ODCM) contains the methodology and parameters used in the calculation of offsite doses due to radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program.

PROCESS CONTROL PROGRAM The PROCESS CONTROL PROGRAM (PCP) contains the requirements for ensuring that processing and packaging of solid radioactive wastes in compliance with regulatory requirements.

REPORTABLE EVENT A REPORTABLE EVENT is any of those conditions specified in Section 50.73 to 10 CFR Part 50.

SITE BOUNDARY The SITE BOUNDARY is the line beyond which the land is not owned, leased, or otherwise controlled by the licensee.

T1.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

TS Section D1, "Introduction," does not contain applicability requirements. As such, all parts of this section can be conservatively defined as being applicable at all times.

All Irradiated Fuel Stored in an Independent Spent Fuel Storage Installation

Since TS Section D1 does not apply in the condition in which all spent fuel is removed from the SFP and stored in the onsite ISFSI, the individual TSs contained therein are not needed. As such, they may be deleted in their entirety with no impact on continued safe storage and maintenance of spent fuel in the ISFSI.

Conclusion

Deleting all TSs in Section D1 is acceptable.

► TS SECTION D2, SAFETY LIMITS ◀

TS Section D2, "Safety Limits," was previously deleted. No changes are required.

► TS SECTION D3, LIMITING CONDITIONS FOR OPERATION ◀

TS Section D3, "Limiting Conditions for Operation," was previously deleted. No changes are required.

► TS SECTION D4, SURVEILLANCE REQUIREMENTS ◀

TS Section D4, "Surveillance Requirements," was previously deleted. No changes are required.

► **TS SECTION D5, DESIGN FEATURES** ◀

T5.1 DESCRIPTION

The existing TS Section 5, "Design Features," contains a description of the site location and Exclusion Area Boundary.

After the transfer of spent fuel on site from the SFP to the ISFSI, there will no longer be any fuel assemblies in the SFP. As such, certain design features will have no relevance to, and no longer apply to, the storage of fuel assemblies in an ISFSI. Therefore, deleting these TSs effective after the last fuel transfer from the SFP to the ISFSI is acceptable.

Since this proposed amendment is premised on spent fuel no longer being stored in the SFP, a new design feature specification is being proposed stating that spent fuel shall not be stored in the SFP.

T5.2 PROPOSED CHANGE

TS Section 5, Design Features

TS being deleted is D5.1 and new TS being proposed and combined with the Units 2 and 3 TS is 4.3 as further described below.

Note: Unit 1 does not currently have a TS 5.2 or 5.3.

TS Being Deleted	TS Being Proposed
D5 DESIGN FEATURES	
D5.1 Site Description	
	4.3 Fuel Storage

There are no corresponding TS Bases sections associated with this TS section.

T5.3 TECHNICAL ANALYSIS

TS D5.1, Site Description

TS D5.1, "Site Description," provides a description of the physical location of SONGS, as well as descriptions and diagrams of the Exclusion Area Boundary (EAB). This TS section is being deleted.

The description of the physical location of SONGS is being deleted for consistency with the Units 2 and 3 TSs, which currently do not contain a similar description. This change is acceptable because the information was used for initial siting of the plant and is no longer needed to ensure safe operation of the plant.

The minimum distance from the center line of the reactor containment to the site exclusion radius is based on requirements contained in 10 CFR 100.3 regarding reactor accident dose analyses. Because the SONGS Unit 1 Part 50 license no longer authorizes emplacement or retention of fuel in the reactor vessel, this design features are no longer needed. As such, the description may be deleted.

The EAB will remain part of the SONGS licensing basis, but under licensee control. The EAB is described in the SONGS Units 2 and 3 UFSAR, Offsite Dose Calculation Manual (ODCM), and the ISFSI 72.212 evaluation (as the controlled area described in 10 CFR 72.106. Future changes to the EAB will be controlled by evaluations in accordance with 10 CFR 50.59, 10 CFR 20, and 10 CFR 72.48, as appropriate.

Proposed New Requirement, Fuel Storage

The Unit 1 TSs do not currently contain a TS for fuel storage. As part of the proposed change to combine the Unit 1 TSs with the Units 2 and 3 TSs, a new requirement will be added to the Units 1, 2, and 3 TSs prohibiting emplacement or storage of spent fuel in the SFPs. See Sections 3.0 and 4.0 of this submittal, regarding Units 2 and 3 TS 4.3, for a discussion of the same change for Units 2 and 3.

Because this proposed amendment is premised on spent fuel no longer being stored in the SFP, the new design feature specification is being proposed (as shown in Attachments 2 and 3) to be added to combined TS Section 4.3 stating that spent fuel shall not be stored in the SFP.

The new specification will read:

“Spent fuel shall not be stored in the SFP.”

T5.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

Unit 1 TS Section D5, “Design Features,” does not contain applicability requirements. As such, all parts of this section are conservatively assumed to be applicable at all times.

All Irradiated Fuel Stored in an Independent Spent Fuel Storage Installation

Unit 1 TS D5 is proposed for deletion to reflect the condition of all fuel assemblies stored in an ISFSI and for consistency with Units 2 and 3 TS 4.1.

Adding a new design feature stating that spent fuel shall not be stored in the SFP documents the premise on which this proposed amendment is based (i.e., spent fuel no longer being stored in the SFP).

Conclusion

Deleting TS D5.1 and adding the proposed design feature specification (regarding prohibition on spent fuel storage in the SFP) to combined TS 4.3, ensures appropriate requirements for the associated design features.

▶ **TS SECTION D6, ADMINISTRATIVE CONTROLS** ◀

T6.1 DESCRIPTION

The existing TS Section D6, "Administrative Controls," contains provisions relating to organization, qualifications, training, reviews and audits, procedures and programs, recordkeeping, reporting, high radiation area controls, the Offsite Dose Calculation Manual (ODCM) and environmental protection necessary to assure operation of the facility in a safe manner.

After the transfer of spent fuel on site from the SFP to the ISFSI, there will no longer be any fuel assemblies in the SFP. As such, the associated administrative controls will have no relevance to and no longer apply to the storage of fuel assemblies in an ISFSI. Therefore, deleting the associated TSs effective after the last fuel transfer on site from the SFP to the ISFSI is acceptable.

T6.2 PROPOSED CHANGE

TS Section D6, Administrative Controls

All TSs in Section D6, with the exception of TS D6.12, High Radiation Area, are being deleted in their entirety, as identified in the table below, as further described below, and as shown in Attachments 2 and 3. Pertinent information being deleted from TSs is being relocated to either the DQAP, the Licensee Controlled Specifications (LCS), or to site procedures. TS D6.12 is being revised, retained, and renumbered as Units 1, 2, and 3 TS 5.8.

TS Being Deleted	TS Being Revised
D6 ADMINISTRATIVE CONTROLS	
D6.1 Responsibility	
D6.2 Organization	
D6.3 Unit Staff Qualifications	
D6.4 Training	
D6.5 Review and Audit (Previously Deleted)	
D6.6 Reportable Event Action	
D6.7 Previously Deleted	
D6.8 Procedures and Programs	
D6.9 Reporting Requirements	
D6.10 Previously Deleted	
D6.11 Radiation Protection Program	
	D6.12 High Radiation Area
D6.13 Process Control Program (PCP)	

TS Being Deleted	TS Being Revised
D6.14 Offsite Dose Calculation Manual (ODCM)	
D6.15 Environmental Protection	

There are no corresponding TS Bases sections associated with this TS section.

T6.3 TECHNICAL ANALYSIS

See discussion in Sections 3.0 and 4.0 of this Enclosure, under TS Section 5.0, "Administrative Controls," for a discussion of relocation of TS requirements to the DQAP or the LCS.

The Unit 1 TSs have been previously revised (Reference 4) to reflect the removal of all fuel from the Unit 1 SFP. In general, the proposed changes in this submittal provide consistency with the proposed Units 2 and 3 TSs and also combine the Unit 1 TSs with the Units 2 and 3 TSs.

There are two main differences between the Unit 1 TSs and the Units 2 and 3 TSs. The first difference is that Unit 1 was a Westinghouse plant while Units 2 and 3 are Combustion Engineering Plants. In the operating phase, this meant that there were significant differences in the TS due to the design differences between Unit 1 and Units 2 and 3. In the ISFSI-only phase, the remaining TS requirements are administrative, and in many cases are consistent across the site. Therefore, combining the Units 1, 2, and 3 TSs from the two different designs is acceptable and will provide a consistent set of requirements for the entire facility.

The second difference is that while the Units 2 and 3 TSs went through an Improved Technical Specification (ITS) conversion during the mid-1990s, Unit 1 was permanently shutdown at that time, and the Unit 1 TSs remain in a "custom" TS format. As a result, many administrative requirements that were relocated out of the Units 2 and 3 TSs and placed in a licensee-controlled document as part of the ITS conversion still appear in the Unit 1 TSs.

For Units 2 and 3, most re-located requirements were placed in a document called the Licensee-Controlled Specifications (LCS), which is incorporated by reference into the Units 2 and 3 UFSAR Chapter 16 and therefore controlled under 10CFR50.59. Since the time of the original relocation, several of the administrative controls that had been relocated from TSs to the LCS have been further relocated to procedures and program documents. This was justified on the basis that 10 CFR 50.59 generally does not apply to administrative requirements. 10 CFR 50.59(c)(4) provides that when applicable regulations establish more specific criteria for controlling certain changes, 10 CFR 50.59 does not also apply. One example of this type of change is that requirements regarding control of the procedure change process were relocated to the SONGS procedure control document, which is controlled under 10 CFR 50, Appendix B. Similarly, requirements for the Process Control Program were relocated to the Radwaste Process Control Program procedure, which is controlled under 10 CFR 20.

For consistency with this approach, this proposed change would relocate several administrative requirements directly to procedures. This would provide a consistent approach for documenting, retaining, and evaluating changes to such requirements across all three Units. See below for more information regarding the proposed relocation of Unit 1 requirements to various documents.

TS D6.1, Responsibility

TS D6.1, "Responsibility," provides a description and requirements regarding certain key operational management responsibilities.

Requirements Revised and Relocated to DQAP

D6.1.1 ~~An SCE Vice President~~ The corporate officer with direct responsibility for the plant shall be responsible for overall management of the plant and ensuring the safe storage and handling of irradiated fuel San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility in his absence.

The requirements of TS D6.1.1 are being revised for consistency with the Units 2 and 3 TS 5.1, and also deleted from TS and relocated to the DQAP.

Revision for consistency with the Units 2 and 3 TSs is acceptable because the change provides a consistent requirement for the entire facility. SCE Corporate Officers have at a minimum the title of Vice President. Relocating these responsibilities to the DQAP is consistent with NRC Administrative Letter 95-06. Therefore, the proposed deletion of TS 5.1 is acceptable.

TS D6.2, Organization

TS D6.1, "Responsibility," provides a description and requirements regarding onsite and offsite organizations and facility staffing. Descriptions include lines of authority and staff responsibilities. Requirements for the Unit Staff also include programmatic requirements for work-hour restrictions for personnel who perform safety-related functions.

D6.2.1 Onsite and offsite organizations shall be established for plant management operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear fuel.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities for the positions delineated in these Technical Specifications, shall be documented in the SONGS 1 Defueled Safety Analysis Report (DSAR) or the SONGS 2 and 3 UFSAR.
- b. ~~An SCE Vice President shall be responsible for overall unit safety.~~ The corporate officer with direct responsibility for the plant shall be responsible for overall safe handling and storage of nuclear fuel and shall have control over those onsite activities necessary for safe handling and storage of the nuclear fuel.
- c. ~~An SCE Vice President shall have corporate responsibility for decommissioning activities.~~ A specified corporate officer (or officers) shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure safe management of nuclear fuel.
- d. The individuals who train those who carry out health physics radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures

UNIT STAFF

D6.2.2 a. ~~Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., health physicists and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.~~

~~Any deviation from the working hour guidelines shall be authorized in advance by the cognizant Vice President within the Nuclear Organization, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.~~

~~Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant Vice President within the Nuclear Organization, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.~~

The requirements of TS D6.2.1 are being revised for consistency with the Units 2 and 3 TS 5.2, and also deleted from TS and relocated to the DQAP.

Revision for consistency with the Units 2 and 3 TSs is acceptable because the changes provide a consistent requirement for the entire facility. In addition, the changes focus the responsibilities of the corporate officer on the safe handling and storage of spent fuel, which is the only remaining nuclear safety issue at an ISFSI-only station. Relocating these responsibilities to the DQAP is consistent with NRC Administrative Letter 95-06. Therefore, the proposed deletion of TS 5.1 is acceptable.

The requirements of TS D6.2.2 are proposed for deletion for consistency with the Units 2 and 3 TSs. The proposed change is acceptable because work hour rules and the programmatic structure for implementing them are governed by 10 CFR 26, Subpart I, and are not necessary in TS.

TS D6.3, Unit Staff Qualifications

TS D6.3, "Unit Staff Qualifications," provides a description and requirements regarding qualifications of the facility staff.

Requirements Revised and Relocated to DQAP

D6.3.1 Each member of the ~~unit~~ facility staff shall meet or exceed the minimum qualifications of ANSI N18.1 1971, "Selection and Training of Personnel for Nuclear Power Plants," for comparable positions, except a) the Plant Superintendent need not hold a Senior Reactor Operator's license at the time of appointment, b) the Manager, Health Physics radiation protection manager, who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September, 1975, and c) multi-discipline supervisors who shall meet or exceed the qualifications listed below.

~~Multi-discipline supervisors shall meet or exceed the following qualifications:~~

- ~~a. Education: Minimum of a high school diploma or equivalent.~~
- ~~b. Experience: Minimum of four years of related technical experience which shall include three years power plant experience of which one year is at a nuclear plant.~~
- ~~c. Training: Complete the multi-discipline supervisor training program.~~

The requirements of TS D6.3.1 are being revised for consistency with the Units 2 and 3 TS 5.3, and also deleted from TS and relocated to the DQAP.

Revision for consistency with the Units 2 and 3 TSs is acceptable because the change provides a consistent requirement for the entire facility. The deletion of the title of ANSI Standard N18.1 1971 is administrative only. The deletion of requirements for the Plant Superintendent and the multi-discipline supervisors are acceptable because these positions are no longer part of the SONGS organization. The change of title from "Manager, Health Physics" to "radiation protection manager" reflects current organization titles and is administrative.

Relocating these responsibilities to the DQAP is consistent with NRC Administrative Letter 95-06. See Section 3.0 and 4.0, subsection T5.3 for discussion of relocation of requirements to the DQAP. Therefore, the proposed deletion of TS 5.1 is acceptable.

TS D6.4, Training

TS D6.4, "Training," provides a requirement for a retraining and replacement training program for the unit staff.

The requirements of TS D6.4.1 are being proposed for deletion for consistency with the Units 2 and 3 TSs. The Units 2 and 3 requirement for a training program was relocated to the LCS as part of Reference 6. The justification at that time was that the requirement was not included in NUREG-1432, the standard TSs for Combustion Engineering plants such as SONGS Units 2 and 3. The requirement has since been relocated to training program documents and finally deleted for Units 2 and 3 because the program has been superseded by the Certified Fuel Handler program described in Units 2 and 3 TSs 5.3.2. In the ISFSI-only configuration, there are no remaining spent fuel assemblies to be monitored and there are no credible accidents that require the actions of a Certified Fuel Handler, Shift Manager, or a Certified Operator to prevent occurrence or mitigate the consequences of an accident. Thus there will no longer be a need for a retraining and replacement training program.

Similarly, Unit 1 currently has no on-shift personnel that a retraining and replacement training program would be applicable to. Deletion of the requirement for the program from the Unit 1 TSs is acceptable because it is no longer applicable to any Unit Staff.

TS D6.5, Review and Audit

TS D6.5, "Review and Audit," was previously deleted. No changes are required.

TS D6.6, Reportable Event Action

TS D6.6, "Reportable Event Action," provides a description of the actions taken for each reportable event.

The requirements of TS D6.6 are being deleted for consistency with the Units 2 and 3 TSs. The proposed deletion is acceptable because the requirements are redundant to those in 10 CFR

50.72 and 10 CFR 50.73. As a result, they are not included in NUREG-1431, the standard TSs for Westinghouse plants, because they are not considered to be necessary for inclusion in TSs.

TS D6.7, Safety Limit Violation

TS D6.7, "Safety Limit Violation," was previously deleted. No changes are required.

TS D6.8, Procedures and Programs

TS D6.8, "Procedures and Programs," provides a description and requirements regarding programs and manuals that are to be established, implemented, and maintained.

Revised, and retained portion
relocated to DQAP

- D6.8.1 Written procedures shall be established, implemented, and maintained covering the following activities referenced below:
- a. ~~The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February, 1978.~~
 - b. ~~Fuel handling operations.~~
 - c. ~~Surveillance and test activities of safety-related equipment required to be operational for the safe storage and handling of irradiated fuel.~~
 - d. ~~Security Plan implementation.~~
 - e. ~~Emergency Plan implementation.~~
 - f. ~~Fire Protection Program implementation.~~
 - g. ~~PROCESS CONTROL PROGRAM implementation.~~
 - h. ~~OFFSITE DOSE CALCULATION MANUAL implementation.~~
 - i. ~~Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 4.15, Revision 1, February, 1979.~~
 - j. Deleted

The requirements of TS D6.8.1 are being revised for consistency with the Units 2 and 3 TS 5.5.1, and the revised and retained portions are being deleted from TS and relocated to the DQAP.

Revision for consistency with the Units 2 and 3 TSs is acceptable because the change provides a consistent requirement for the entire facility. The deletion of requirements related to RG 1.33 procedures is discussed in Section 3.0 and 4.0, under TS 5.5.1. The deletion of requirements related to fuel handling operations and surveillance and test activities for safe storage and handling of fuel are acceptable because in the ISFSI-only configuration there will be no need for

fuel handling operations. The deletion of requirements for Security Plan, Emergency Plan, Process Control Program, and Offsite Dose Calculation Manual Implementation was previously approved for Units 2 and 3 by Reference 6 on the basis that this requirement does not appear in NUREG-1432, the standard TSs for Combustion Engineering plants such as SONGS Units 2 and 3. The requirement also does not exist in NUREG-1431, the standard TSs for Westinghouse plants such as Unit 1. Currently, administrative controls for procedure changes to these programs is controlled by the SONGS procedure control process. See below for discussion of deletion of TSs D6.13 for the Process Control Program and D6.14 for the ODCM. Deletion of these requirements is acceptable because they are no longer needed or are not required to be described in TSs.

Relocating the remaining requirements to the DQAP is consistent with NRC Administrative Letter 95-06. Therefore, the proposed deletion of TS D6.8.1 is acceptable.

Relocated to procedures

D6.8.2 Each procedure of D6.8.1 above, and changes thereto, shall be approved by the Vice President - Nuclear Generation; or by the Station Manager, for procedures within his organization; or by the responsible Nuclear Division Manager; or by their designees as previously designated by the Vice President - Nuclear Generation, prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

D6.8.3 Temporary changes to the procedures of D6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the nuclear division management staff exercising responsibility in the specific area and unit or units addressed by the change.
- c. The change is documented, reviewed and approved by responsible nuclear division management staff, as designated in accordance with D6.8.2 above, within 14 days of implementation.

TS D6.8.2 and D6.8.3 provide requirements related to the authorization to approve procedure changes to the procedures described in TS D6.8.1. These requirements are proposed for relocation to procedures for consistency with the Units 2 and 3 TSs. Relocation to a licensee-controlled document (the LCS) was previously approved for Units 2 and 3 by Reference 6. The justification at that time was that the requirement was not included in NUREG-1432, the standard TSs for Combustion Engineering plants such as SONGS Units 2 and 3. The administrative controls for procedure changes to these programs have since been further relocated to the SONGS procedure for procedure control process, and changes to these controls are controlled by 10 CFR 50 Appendix B.

The requirement for procedure change controls does not exist in NUREG-1431, the standard TSs for Westinghouse plants such as Unit 1. Therefore, the proposed relocation of TS D6.8.2 and D6.8.3 to a licensee controlled document is acceptable. Inclusion of the Unit 1 requirement in the same procedure as the Units 2 and 3 requirement provides a consistent application across all three Units.

D6.8.4 The following programs shall be established, implemented, and maintained:

a. Radioactive Effluent Controls Program

A ~~This~~ program shall be provided conforming with ~~to~~ 10 CFR 50.36a ~~provides~~ for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program ~~(1)~~ shall be contained in the ODCM, ~~(2)~~ shall be implemented by operating procedures, and ~~(3)~~ shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2;
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to ~~Appendix I to~~ 10 CFR Part 50, Appendix I;
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year, ~~respectively~~, in accordance with the methodology and parameters in the ODCM at least every 31 days;
- 6) Limitations on the operability functional capability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days ~~period~~ would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to ~~Appendix I to~~ 10 CFR Part 50, Appendix I;
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1;
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to ~~Appendix I to~~ 10 CFR Part 50, Appendix I;
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radioactive-nuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to ~~Appendix I to~~ 10 CFR Part 50, Appendix I;
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

The requirements of TS D6.8.4.a are being revised for consistency with the Units 2 and 3 TS 5.5.2.3, and the revised and retained portions are being deleted from TS and relocated to the LCS.

Revision for consistency with the Units 2 and 3 TSs is acceptable because the change provides a consistent requirement for the entire facility. The change from “operability” to “functional capability” reflects that the components in question are not described in TS Limiting Conditions for Operation. The change to add “and gaseous” to the limitations on effluent treatment systems is more restrictive and provides additional assurance that those treatment systems will operate when required. All other proposed changes are editorial in nature.

See Section 3.0 and 4.0 for TS 5.5.2.3 for discussion of why relocation of the Radioactive Effluent Controls Program to the LCS is acceptable.

Revised and Relocated to
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b. Radiological Environmental Monitoring Program

~~A program shall be provided to monitor the radiation and radio-nuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:~~

- ~~1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,~~
- ~~2) A Land Uses Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and~~
- ~~3) Participation in an Interlaboratory Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.~~

Completely revised for consistency with Units 2 and 3 TS 5.5.2.1.b

The purpose of the Radiological Environmental Monitoring Program is to monitor the radiation and radio-nuclides in the environs of the plant. The program is revised for consistency with the Units 2 and 3 requirements and is proposed for relocation to the LCS.

The program description is proposed for revision for consistency with the Units 2 and 3 TSs. The revision to the program description and relocation to TS 5.5.2.1.b was previously approved for Units 2 and 3 by Reference 6 on the basis that the program details do not appear in NUREG-1432, the standard TSs for Combustion Engineering plants such as SONGS Units 2

and 3. These program details also do not appear in NUREG-1431, the standard TSs for Westinghouse plants such as Unit 1, and a similar revision and relocation is acceptable.

See Section 3.0 and 4.0, discussion of Units 2 and 3 TS 5.5.2.1, for a discussion of relocation of the ODCM and Radiological Environmental Monitoring Program to the LCS.

TS D6.9, Reporting Requirements

TS D6.9, "Reporting Requirements," provides a description and requirements regarding certain annual reports.

SCE is proposing to delete TS D6.9, "Reporting Requirements," from the TSs and relocate the majority of requirements to the LCSs for consistency with the Units 2 and 3 TSs. The relocated requirements are TS D6.9.1, "Routine Reports," TS D6.9.1.3, "Annual Radiological Environmental Operating Report", TS D6.9.1.4, "Annual Radioactive Effluent Release Report." See Section 3.0 and 4.0 of this submittal regarding Units 2 and 3 TSs 5.7 for a discussion of relocation of these reporting requirements to the LCS.

TS D6.9.2 is being proposed for deletion for consistency with the Units 2 and 3 TSs 5.7.1.2 and 5.7.1.3. The proposed deletion is acceptable because the requirements are redundant to 10 CFR 50.36a(2) which requires these annual reports to be submitted in accordance with 10 CFR 50.4.

TS D6.10, Record Retention

TS D6.10, "Record Retention," was previously deleted. No changes are required.

TS D6.11, Radiation Protection Program

TS D6.11, "Radiation Protection Program," provides requirements for development and adherence to procedures for personnel radiation protection.

The requirements of TS D6.11 are being proposed for relocation to procedures for consistency with the Units 2 and 3 TSs. Relocation to a licensee-controlled document (the LCS) was previously approved for Units 2 and 3 by Reference 6. The justification at that time was that the requirement was not included in NUREG-1432, the standard TSs for Combustion Engineering plants such as SONGS Units 2 and 3. The administrative controls for the radiation protection program have since been further relocated to SONGS procedure SO123-VII-20, "Radiation Protection Program, and changes to these controls are controlled by 10 CFR 20.

The requirement for a radiation protection program does not exist in NUREG-1431, the standard TSs for Westinghouse plants such as Unit 1. Therefore, the proposed relocation of TS D6.11 to a licensee controlled document is acceptable. Inclusion of the Unit 1 requirement in the same procedure as the Units 2 and 3 requirement provides a consistent application across all three Units.

TS D6.12, High Radiation Area

TS D6.12, "High Radiation Area," provides a description and requirements regarding controls applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR 20 (as provided in paragraph 20.1601(c) of 10 CFR 20). TS D6.12 will remain germane with all spent fuel stored in the ISFSI. As such, it is being revised for consistency with the Units 2 and 3 TS, re-numbered, and combined with Units 2 and 3 TS 5.8.

D6.12 HIGH RADIATION AREA

D6.12.1 Each high radiation area as defined in 10 CFR Part 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a ~~Radiation Exposure Permit (REP)~~Radiation Work Permit (RWP) or equivalent.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable ~~REPRWP~~ or equivalent.

D6.12.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty, health physics radiation protection supervisor, or his or her designee. Doors shall remain locked except during periods of access by personnel under an approved ~~REPRWP~~ or equivalent that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the ~~REPRWP~~ or equivalent, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

D6.12.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

Revision for consistency with the Units 2 and 3 TSs is acceptable because the change provides a consistent requirement for the entire facility. The change to allow the shift manager on duty to maintain keys for locked high radiation areas provides an equivalent or greater level of control to a health physics/radiation protection supervisor. The change from "health physics" to "radiation protection" reflects the current SONGS organization and is administrative only.

The change from "Radiation Exposure Permit (REP)" to "Radiation Work Permit (RWP)" reflects more commonly used language within the industry, and is an administrative change. In addition, the change allows an equivalent process to the RWP process in order to provide additional flexibility for future changes to the permitting process as the site moves through decommissioning. This change is acceptable because it is consistent with the description of the RWP process in NUREG-1432, Revision 4, "Standard Technical Specifications, Combustion Engineering Plants," TS 5.7, "High Radiation Area." This change is also consistent with the guidance of Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants." Section 2.2 of the Regulatory Guide, "Positive Access Control," states that nuclear power plants can institute appropriate positive access controls to high radiation areas through the use of RWPs *or an equivalent process* (emphasis added).

The change to allow a designee for the radiation protection supervisor provides additional flexibility as the site moves through decommissioning. This change is acceptable because it more closely aligns with the Standard Technical Specifications in NUREG-1432, Revision 4, TS 5.7, "High Radiation Area."

The combination of the Unit 1 requirement with the Units 2 and 3 requirements as one document is administrative only.

TS D6.13, Process Control Program (PCP)

TS D6.13, "Process Control Program," provides a description and requirements regarding processing and packaging of solid radioactive wastes. TS D6.13 is proposed for deletion and relocation to procedures for consistency with the Units 2 and 3 TSs.

Relocation of the Process Control Program to a licensee-controlled document (the LCS) was previously approved for Units 2 and 3 by Reference 6. The justification at that time was that the requirement was not included in NUREG-1432, the standard TSs for Combustion Engineering plants such as SONGS Units 2 and 3. The administrative controls for the process control program have since been further relocated to SONGS procedure SO123-VII-8.5.1, "Radwaste Process Control Program," and changes to the program are controlled by 10 CFR 20.

The requirement for a process control program does not exist in NUREG-1431, the standard TSs for Westinghouse plants such as Unit 1. Therefore, the proposed relocation of TS D6.13 to a licensee controlled document is also acceptable. Inclusion of the Unit 1 requirement in the same procedure as the Units 2 and 3 requirement provides a consistent application across all three Units.

The proposed changes to TS D6.13 are acceptable because the requirements are not necessary in TS.

TS D6.14, Offsite Dose Calculation Manual (ODCM)

TS D6.14, "Offsite Dose Calculation Manual (ODCM)," specifies how to document, review, and approve changes to the ODCM.

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D6.14 OFFSITE DOSE CALCULATION MANUAL

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program;
- b. The ODCM shall also contain the Radioactive Effluent Controls required by Specification [5.5.2.3] and Radiological Environmental Monitoring Programs required by the [LCS], and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and Radioactive Release Report required by Specification [5.7.1.2] and Specification [5.7.1.3]

~~D6.14.1 The Offsite Dose Calculation Manual (ODCM) shall be approved by the Commission prior to implementation.~~

D6.14.2 Licensee-initiated changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the changes(s);
 - b. A determination that the change(s) will maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, Appendix I and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable.
2. Shall become effective upon review and approval by the ~~Vice President – Nuclear Generation~~ corporate officer with direct responsibility for the plant, or his designee.
3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month/ and year) the change was implemented.

SCE proposes to revise this specification for consistency with the Units 2 and 3 TSs, delete the Unit 1 requirement from TSs and relocate it to the LCS.

Revision for consistency with the Units 2 and 3 TSs is acceptable because the change provides a consistent requirement for the entire facility. Changes include 1) additional provisions for the methodology and parameters used in the calculation of offsite doses, 2) deletion of a requirement that the ODCM be approved by the Commission prior to implementation, 3) a change to the title of the signature authority for changes to the ODCM, and 4) various editorial and administrative changes that do not change the meaning of the TS. The additional provisions are more restrictive and provide guidance on the content of the ODCM. The deletion of the requirement that the ODCM shall be approved by the Commission was previously approved for Units 2 and 3 as part of Reference 6. The change to the title of signature authority for changes to the ODCM is administrative only. SCE corporate officers have the title of SCE Vice President or higher. Editorial and administrative changes do not change the meaning of the TS and are acceptable.

See section 3.0. and 4.0 of this submittal regarding Units 2 and 3 TS 5.5.2.1 for a discussion of why relocating the ODCM requirements to the LCS is acceptable.

The proposed changes are acceptable because they provide additional restrictions, delete information that is not necessary in TSs, provide equivalent level of control, or are administrative.

TS D6.15, Environmental Protection

TS D6.15, "Environmental Protection," provides a description of design features, operating practices, and reporting requirements related to environmental impact from the site. This TS is being proposed for deletion in its entirety.

The requirements of TS D6.15 are being proposed for deletion from the TSs for consistency with the Units 2 and 3 TSs. TS D6.15 consists of TS D6.15.1, a description of design features and operating practices. Previously, this TS described the potential impact of the saltwater intake and discharge systems. That description was deleted as part of Amendment 165 to the Unit 1 license to reflect decommissioning of Unit 1. TS D6.15.2 describes environmental reporting requirements. TS D6.15.2.a describes reports required prior to implementation of changes to plant environmental design, operation, or procedures. TS 6.15.2.b describes reports required following unusual or important events. TS 6.15.2.c describes reports required related to NPDES Permits and State Certifications.

The proposed change to delete TS D6.15.1 is acceptable because there are no longer any design features to which the specification is applicable. That is, the saltwater intake and discharge systems have previously been deleted from TSs.

The proposed change to TS D6.15.2.a is acceptable because the requirements are redundant to the reporting requirements of the Units 2 and 3 Environmental Plan (Appendix B to the Units 2 and 3 licenses), section 3.1. The proposed change to TS D6.15.2.b is acceptable because the requirements are identical and redundant to the requirements of the Units 2 and 3 Environmental Plan, Section 4.1. The proposed change to TS 6.15.2.c is acceptable because

the requirements are identical and redundant to the Units 2 and 3 Environmental Plan, Section 3.2. Because the environmental release points for Unit 1 (saltwater intake and discharge) have been removed from service, and environmental reports required for the site would be covered under these Units 2 and 3 reporting requirements, and the Unit 1 TS requirements are no longer necessary.

T5.4 SUMMARY

Current Permanently Defueled Condition with Fuel in the Spent Fuel Pool

TS Section D6, Administrative Controls, does not contain applicability requirements. As such, all parts of this section are conservatively assumed to be applicable at all times.

All Irradiated Fuel Stored in an Independent Spent Fuel Storage Installation

TS Section D6.0 describes administrative controls associated with fuel storage in the SFP. After the transfer of spent fuel from the SFP to the ISFSI, there will no longer be any fuel assemblies in the SFP. However, there may continue to be high radiation areas in the facility. Therefore, with the exception of TS D6.12, "High Radiation Area," this TS section is no longer required and may be deleted. Pertinent requirements will be relocated to either the DQAP, LCS, or procedures and controlled in accordance with 10 CFR 50.54(a), and 10 CFR 50.59, respectively, or other more specific regulations. Appropriate administrative controls for spent fuel storage within an ISFSI are specified in the applicable ISFSI storage system TSs.

TS D6.12 will remain applicable following the complete transfer of spent fuel from the SFP to the ISFSI because high radiation areas may continue to exist in the facility. As such, it is being revised for consistency with Units 2 and 3 TS 5.8, and re-numbered and combined with Units 2 and 3 TS 5.8.

These proposed changes are acceptable because they remove unnecessary information from TSs, provide consistent requirements across the three units during decommissioning, and provide appropriate controls for an ISFSI-only configuration.

Conclusion

Deleting TSs D.6.1 through D6.11, and D6.13 through D6.15 in their entirety and relocating the pertinent requirements discussed above to either the DQAP, LCS, or procedures is acceptable.

Retaining TS D6.12, as revised and combined with Units 2 and 3 TS 5.8, continues to ensure appropriate requirements for high radiation areas.

7.0 REGULATORY ANALYSIS

7.1 No Significant Hazards Consideration

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) requests an amendment to Facility Operating License Numbers DPR-13, NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS) Units 1, 2 and 3. The proposed amendments would revise the Units 2 and 3 Operating Licenses and associated Technical Specifications (TS) to reflect removal of all spent nuclear fuel from the Units 2 and 3 Spent Fuel Pools (SFP) and its transfer to dry cask storage within an Independent Spent Fuel Storage Installation (ISFSI). In addition, the proposed amendments would revise the Unit 1 TSs for consistency with the Units 2 and 3 proposed changes and combine the Units 1, 2, and 3 TSs into a single document.

By letters dated June 28, 2013 and July 22, 2013, SCE submitted a certification of permanent removal of fuel from the reactor vessels for SONGS Units 2 and 3, pursuant to 10 CFR 50.82(a)(1)(ii). Therefore, the 10 CFR Part 50 licenses for SONGS Units 2 and 3 no longer authorize operation of the reactors or emplacement or retention of fuel into the reactor vessels. The Post-Shutdown Decommissioning Activities Report (PSDAR) for SONGS Units 2 and 3 dated September 23, 2014, documented that SCE expects to have all spent fuel transferred to the ISFSI in 2019. In support of this condition, the SONGS Units 2 and 3 licenses and associated TSs are being proposed for revision, in accordance with 10CFR 50.36(c)(6), for consistency with a facility configuration with all spent nuclear fuel in dry storage within the onsite ISFSI at SONGS using casks certified for use under a general 10 CFR 72 license.

The existing SONGS Units 2 and 3 TSs contain Limiting Conditions for Operation (LCOs) that provide for appropriate functional capability of equipment required for safe storage and management of irradiated fuel with fuel stored in a SFP. As such, the existing TSs provide a level of control in excess of that needed for safe storage and management of irradiated fuel with fuel stored in an ISFSI. The majority of the existing TSs are only applicable when irradiated fuel assemblies are within the SFP. Once all spent fuel assemblies have been transferred to the ISFSI, all remaining LCOs (and associated Surveillance Requirements (SRs)) will no longer be applicable and are being proposed for deletion (along with deletion and relocation of certain design requirements and administrative requirements that are also no longer needed). The changes being proposed reflect the removal of all spent fuel from the SFP. The proposed changes will result in TSs that will be applicable to SONGS after the last spent fuel assembly has been removed from the SFP and placed within the ISFSI.

In addition, SONGS Unit 1 has been permanently shut down since 1993 and is in the decommissioning phase. Above-ground structures have been dismantled. Unit 1 fuel is stored in the ISFSI and in the GE-Hitachi Morris facility. By letter dated September 22, 2004, the NRC approved TS to reflect transfer of all Unit 1 spent fuel into dry storage within an ISFSI.

SCE has evaluated the proposed amendments to determine if a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

- 1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No

The proposed amendment would modify the SONGS Units 2 and 3 facility operating licenses and TS by deleting the portions of the licenses and TSs that are no longer applicable to a facility with no spent nuclear fuel stored in the SFP, while modifying the remaining portions to correspond to all nuclear fuel stored within an ISFSI. This amendment becomes effective upon removal of all spent nuclear fuel from the SONGS Units 2 and 3 SFP and its transfer to dry cask storage within an ISFSI.

Additionally, the proposed change would revise the Unit 1 TSs for consistency with the proposed changes to the Units 2 and 3 TSs. Similar to the changes for Units 2 and 3, the Unit 1 changes delete portions of the TSs that are no longer applicable to a facility with spent fuel no longer stored in the SFP, while modifying the remaining portions to correspond to all nuclear fuel in dry storage. The Unit 1 TSs are also proposed to be combined with the Units 2 and 3 TSs.

The definition of safety-related Structures, Systems, and Components (SSCs) in 10 CFR 50.2 states that safety-related SSCs are those relied on to remain functional during and following design basis events to assure:

1. The integrity of the reactor coolant boundary;
2. The capability to shutdown the reactor and maintain it in a safe shutdown condition; or
3. The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in 10 CFR 50.43(a)(1) or 100.11.

The first two criteria (integrity of the reactor coolant pressure boundary and safe shutdown of the reactor) are not applicable to a plant in a permanently defueled condition. The third criterion is related to preventing or mitigating the consequences of accidents that could result in potential offsite exposures exceeding limits. However, after all nuclear spent fuel assemblies have been transferred to dry cask storage within an ISFSI, none of the SSCs at SONGS Units 2 and 3 are required to be relied on for accident mitigation. Therefore, none of the SSCs at SONGS Units 2 and 3 meet the definition of a safety-related SSC stated in 10 CFR 50.2. The proposed deletion of requirements in the TSs is not related to any systems credited in an accident analysis at SONGS Units 2 and 3.

Chapter 15 of the SONGS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) described the design basis accidents (DBAs) related to the SFP. The majority of these postulated accidents are predicated on spent fuel being stored in the SFP. With the removal of the spent fuel from the SFP, there are no remaining spent fuel assemblies to be monitored and there are no credible accidents that require the actions of a Certified Fuel Handler, Shift Manager, or a Certified Operator to prevent occurrence or mitigate the consequences of an accident.

With all of the SONGS 1 operating plant above-ground structures having been demolished and removed, and all Unit 1 spent fuel having been removed from the SFP, there are no remaining design basis accidents or transients in Chapter 8 of the Unit 1 Defueled Safety Analysis Report (DSAR).

The proposed changes do not have an adverse impact on the remaining decommissioning activities or any of their potential consequences.

The proposed changes related to the relocation of certain administrative requirements do not affect operating procedures or administrative controls that have the function of preventing or mitigating any accidents applicable to the safe management of irradiated fuel or decommissioning of the facility.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed changes eliminate the operational requirements and certain design requirements associated with the storage of the spent fuel in the SFP, and relocate certain administrative controls to the Decommissioning Quality Assurance Program or Licensee Controlled Specifications (LCS).

After the removal of the spent fuel from the Units 2 and 3 SFP and transfer to the ISFSI, there are no spent fuel assemblies that remain in a SFP on site. Coupled with a prohibition against storage of fuel in the Units 2 and 3 SFP (the Unit 1 SFP has been dismantled), the potential for fuel related accidents is removed. The proposed changes do not introduce any new failure modes.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The removal of all spent nuclear fuel from the SFPs into storage in casks within an ISFSI, coupled with a prohibition against future storage of fuel within the Units 2 and 3 SFPs (the Unit 1 SFP has been dismantled), removes the potential for fuel related accidents.

The design basis and accident assumptions within the SONGS Units 1, 2 and 3 UFSARs and the TSs relating to safe management and safe storage of spent fuel in the SFP are no longer applicable. The proposed changes do not affect remaining plant operations, systems, or components supporting decommissioning activities.

The proposed deletion of TS requirements is not related to any SSCs that will be credited in the accident analysis for an applicable postulated accident. As a result, the proposed deletions do not affect the margin of safety associated with the accident analysis.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

7.2 Applicable Regulatory Requirements/Criteria

Design Basis Accidents (DBAs)

Chapter 15 of the SONGS Units 2 and 3 UFSAR describes the safety analysis aspects of the plant that were evaluated to demonstrate that the plant could be decommissioned safely and that radiological consequences from postulated accidents do not exceed the guidelines of 10 CFR 50.67. The scenarios are listed in the Table below. With all spent fuel stored within an ISFSI, all accident scenarios involving spent nuclear fuel in the SFP are no longer applicable. Of the remaining accident scenarios, the Radioactive Waste Gas System Leak or Failure is no longer credible because the waste gas decay tanks have been purged of their contents. The Radioactive Waste System Leak or Failure (Release to Atmosphere) event and the Postulated Radioactive Releases Due to Liquid Tank Failures event remain applicable but these scenarios do not rely on SSCs or parameters that meet the criteria of 10 CFR 50.36 for inclusion in the TS.

UFSAR Chapter 15 Postulated Accidents or Transients		Applicability with All Fuel in ISFSI
Transient Analysis		
15.7.3.1	Radioactive Waste Gas System Leak Or Failure	Yes
15.7.3.2	Radioactive Waste System Leak Or Failure (Release To Atmosphere)	Yes
15.7.3.3	Postulated Radioactive Releases Due To Liquid Tank Failures	Yes
15.7.3.4	Design Basis Fuel Handling Accident Inside Fuel Building	No
15.7.3.5	Spent Fuel Cask Drop Accidents	No
15.7.3.6	Spent Fuel Pool Gate Drop Accidents	No
15.7.3.7	Test Equipment Drop	No
15.7.3.8	Spent Fuel Pool Boiling Accident	No
15.7.3.9	(DELETED)	No
15.7.3.10	Spent Fuel Assembly Drop	No
15.7.3.11	Use Of Miscellaneous Equipment Under 2000 lbs	No

With all of the SONGS 1 operating plant above-ground structures having been demolished and removed, and all Unit 1 spent fuel having been removed from the SFP, there are no remaining design basis accidents or transients in Chapter 8 of the Unit 1 DSAR.

10 CFR 50.2, Definitions, Safety-Related Structures, Systems and Components

10 CFR 50.2 defines safety-related SSCs as those structures, systems and components that are relied upon to remain functional during and following design basis events to assure:

1. The integrity of the reactor coolant pressure boundary
2. The capability to shut down the reactor and maintain it in a safe shutdown condition; or
3. The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in § 50.34(a)(1) or § 100.11 of this chapter, as applicable.

10 CFR 50.36, Technical Specifications

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TSs. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and mitigation of accident consequences; the Commission noted that applicants were expected to incorporate into their TSs "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." (Statement of Consideration, "Technical Specification for Facility Licenses; Safety Analysis Reports," 33 FR 18610 (December 17, 1968).) Pursuant to 10 CFR 50.36, TSs are required to include items in the following five categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TSs.

In September 1992, the Commission issued NUREG-1431 and NUREG-1432, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. Standard Technical Specifications (STS) were established as a model for developing improved TSs for Westinghouse and Combustion Engineering plants, respectively, in general. STSs reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which was published in a "Split Report" issued to the Nuclear Steam Supply System (NSSS) Owners Groups in May 1988. STSs also reflect the results of extensive discussions concerning various drafts of STSs, so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all NSSS designs. As such, the generic Bases presented in NUREG-1431 and NUREG-1432 provide an abundance of information regarding the extent to which the STSs present requirements that are necessary to protect public health and safety.

On July 22, 1993, the Commission issued its Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, indicating that satisfying the guidance in the policy statement also satisfies Section 182a of the Atomic Energy Act of 1954, as amended (the Act), and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the safety benefits of the improved STSs, and encouraged licensees to use the improved STSs as the basis for plant-specific TS amendments, and for complete conversions to improved STSs. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TSs and defined the guidance criteria to be used in determining which of the LCOs and associated surveillances should remain in the TSs.

The final Commission Policy Statement established four criteria to define the scope of equipment and parameters to be included in the improved Standard Technical Specifications. These criteria were developed for licenses authorizing operation (i.e., operating reactors) and focused on instrumentation to detect degradation of the reactor coolant system pressure boundary, process variables and equipment, design features, or operating restrictions that affect the integrity of fission product barriers during design bases accidents or transients. A fourth criterion refers to the use of operating experience and probabilistic risk assessment to identify and include in the TS SSCs shown to be significant to public health and safety. These criteria, which were subsequently codified in changes to Section 36 of Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR 50.36) (60 FR 36953), also pertain to the Technical Specification requirements for safe storage of spent fuel. A general discussion of these considerations is provided below.

Criterion 1 of 10 CFR 50.36(c)(2)(ii)(A) states that Technical Specification limiting conditions for operation must be established for "installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary." Since SONGS Units 2 and 3 are no longer authorized to emplace or retain fuel in the reactors, this criterion is not applicable.

Criterion 2 of 10 CFR 50.36(c)(2)(ii)(B) states that Technical Specification limiting conditions for operation must be established for a "process variable, design feature, or operating restriction that is an initial condition of a design basis accident [DBA] or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." The purpose of this criterion is to capture those process variables that have initial values assumed in the design basis accident and transient analyses, and which are monitored and controlled during power operation. Since SONGS Units 2 and 3 are no longer authorized to emplace or retain fuel in the reactors, this criterion is not applicable.

Criterion 3 of 10 CFR 50.36(c)(2)(ii)(C) states that Technical Specification limiting conditions for operation must be established for structures, systems, or components (SSCs) that are part of the primary success path and which function or actuate to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The intent of this criterion is to capture into TS only those SSCs that are part of the primary success path of a safety sequence analysis. Also captured by this criterion are those support and actuation systems that are necessary for items in the primary success path to successfully function. The primary success path of a safety sequence analysis consists of the combination and sequences of equipment needed to operate (including consideration of the single failure criterion), so that the plant response to design basis accidents and transients limits the consequences of these events to within the appropriate acceptance criteria. Since fuel will have been removed from the SFP at the SONGS facility prior to implementation of this amendment and because non-fuel-related accidents do not rely on any SSCs or parameters described in the TSs, this criterion is not applicable.

Criterion 4 of 10 CFR 50.36(c)(2)(ii)(D) states that Technical Specification limiting conditions for operation must be established for SSCs that operating experience or probabilistic risk assessment has shown to be significant to public health and safety. The intent of this criterion is that risk insights and operating experience be factored into the establishment of Technical Specification limiting conditions for operation. Since fuel will have been removed from the SFP at the SONGS facility prior to implementation of this amendment and because non-fuel-related accidents do not rely on any SSCs or parameters described in the TSs, this criterion is not applicable.

Addressing administrative controls, 10 CFR 50.36(c)(5) states that they "...are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The particular administrative controls to be included in the TSs, therefore, are the provisions that the Commission deems essential for the safe operation of the facility that are not already covered by other regulations. Accordingly, the NRC staff determined that administrative control requirements that are not specifically required under Section 50.36(c)(5), and which are not otherwise necessary to obviate the possibility of an abnormal situation or an event giving rise to an immediate threat to the public health and safety, may be relocated to more appropriate documents (e.g., Quality Assurance Program, Technical Requirements Manual, Security Plan, or Emergency Plan), which are subject to regulatory controls. Similarly, while the required content of TSs administrative controls is specified in 10 CFR 50.36(c)(5), particular details may be relocated to licensee-controlled documents, where other regulations provide adequate regulatory control.

10 CFR 50.36(c)(6), "Decommissioning," applies only to nuclear power reactor facilities that have submitted the certifications required by § 50.82(a)(1). For such facilities, TSs involving safety limits, limiting safety system settings, and limiting control system settings; limiting conditions for operation; surveillance requirements; design features; and administrative controls will be developed on a case-by-case basis.

Decommissioning Quality Assurance Program (DQAP) and Licensee Controlled Specifications (LCS)

The Decommissioning Quality Assurance Program (DQAP) and LCS are appropriate candidates for relocations of administrative controls due to the controls imposed by such regulations as 10

CFR 50.59, Appendix B to 10 CFR Part 50, the existing NRC-approved QA plans and commitments to industry QA standards, and the established QA program change control process of 10 CFR 50.54(a). The LCS are part of the Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) and therefore subject to the requirements of 10 CFR 50.59.

Administrative Letter (AL) 95-06

NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," (<http://www.nrc.gov/reading-rm/doc-collections/gen-comm/admin-letters/1995/al95006.html>) provides guidance to licensees requesting amendments that relocate administrative controls to NRC-approved QA program descriptions, where subsequent changes are controlled pursuant to 10 CFR 50.54(a). AL 95-06 provides specific guidance in the areas of: (1) independent safety engineering group, (2) reviews and audits, (3) procedure review process, and (4) records and record retention.

Some relocations are specifically discussed in AL 95-06, while others are similar in nature. Relocations not specifically discussed in AL 95-06 were assessed with respect to the appropriateness of the relocation. Editorial changes are allowed without basis by 10 CFR 50.54(a)(3).

AL 95-06 states that for the procedure review process, re-location should be to a QA plan that contains a commitment to process procedures and procedure changes in accordance with an accepted standard to ANSI N18.7. As part of NRC approval of the SONGS DQAP (Reference 4), the commitment to ANSI N18.7 was deleted. Re-location of site-specific TSs requirements regarding the establishment, implementation and maintenance of procedures to the QA plan remains acceptable because the change control process of 10 CFR 50.54(a) would still govern any future changes to these requirements, as described in the AL 95-06.

On February 9, 1996, the NRC issued Amendment No. 127 to Facility Operating License No. NPF-10 for SONGS Unit 2 and Amendment No. 116 to Facility Operating License NPF-15 for SONGS Unit 3 (Reference 6). The amendments consisted of changes to the TSs and the license conditions for SONGS Units 2 and 3. As stated in the NRC safety evaluation accompanying Amendments 127 and 116, the amendment converted the previous custom TS (CTS) to the improved TS (ITS) and relocated certain requirements to other licensee-controlled documents. The SONGS Units 2 and 3 ITS are based on:

- NUREG-1432, "Standard Technical Specifications (STS) Combustion Engineering Plants," Revision 0;
- "NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," dated July 22, 1993 (58 FR 39132); and
- 10 CFR 50.36, "Technical Specifications."

This proposed amendment deletes the portions of the previous SONGS Units 2 and 3 TSs that are no longer applicable to a permanently defueled facility with all irradiated fuel in dry storage within an ISFSI, while modifying the remaining portions to correspond to the permanently defueled condition, consistent with STS.

The proposed amendment also modifies the Unit 1 TSs for consistency with the Units 2 and 3 TSs and combines the remaining Unit 1 requirements with the remaining Units 2 and 3 requirements. This proposed change will provide a uniform set of requirements across the site. Unit 1 TSs were never revised to conform to the Improved Technical Specification format. This

proposed changes to the Unit 1 TSs will also provide consistency with the Improved Technical Specification format and the NRC Final Policy Statement on Technical Specification Improvements.

10 CFR 50.51, Continuation of License

10 CFR 50.51(b) states "Each license for a facility that has permanently ceased operations, continues in effect beyond the expiration date to authorize ownership and possession of the production or utilization facility, until the Commission notifies the licensee in writing that the license is terminated. During such period of continued effectiveness the licensee shall--

- (1) Take actions necessary to decommission and decontaminate the facility and continue to maintain the facility, including, where applicable, the storage, control and maintenance of the spent fuel, in a safe condition, and
- (2) Conduct activities in accordance with all other restrictions applicable to the facility in accordance with the NRC regulations and the provisions of the specific 10 CFR part 50 license for the facility."

10 CFR 50.82, Termination of License

10 CFR 50.82(a)(2) states "Upon docketing of the certifications for permanent cessation of operations and permanent removal of fuel from the reactor vessel, or when a final legally effective order to permanently cease operations has come into effect, the 10 CFR part 50 license no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel."

7.3 Precedent

This proposed amendment is consistent with the license, and accompanying TSs, issued to Zion Nuclear Power Station on January 14, 2015 (Reference 7), which was issued to reflect the unloaded SFP status of the plant.

7.4 Conclusion

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

8.0 ENVIRONMENTAL CONSIDERATION

SCE has evaluated these license amendments against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. SCE has determined that this license amendment meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10)(ii). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, that changes a requirement with respect to installation or use of a facility component located within the restricted area, and changes to recordkeeping, reporting, or administrative procedures or requirements.

However, (i) the proposed amendment involves no significant hazards consideration, (ii) there is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite, and (iii) there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusions set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10)(ii).

Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

9.0 REFERENCES

1. Letter from P. T. Dietrich (SCE) to Document Control Desk (NRC), dated June 28, 2013; Subject: Docket No. 50-362, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 3 (ADAMS Accession No. ML13183A391)
2. Letter from P. T. Dietrich (SCE) to Document Control Desk (NRC) dated July 22, 2013; Subject: Docket No. 50-361, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 2 (ADAMS Accession Number ML13204A304)
3. Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated September 23, 2014; Subject: Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Units 2 and 3, Post-Shutdown Decommissioning Activities Report (ADAMS Accession No. ML14269A033)
4. Letter from D. M. Gillen (NRC) to H.B. Ray (SCE) dated September 22, 2004; Subject: San Onofre Nuclear Generating Station, Unit 1 – Issuance of Amendment Upon Transfer of All Spent Fuel Storage From the Spent Fuel Pool Into Dry Cask Storage (TAC No. L52616)
5. Letter from M. K. Khanna (NRC) to T. J. Palmisano (SCE) dated August 10, 2015; Subject: San Onofre Nuclear Generating Station, Units 1, 2, and 3 and the Independent Spent Fuel Storage Installation – Review of Changes to the Decommissioning Quality Assurance Program (ADAMS Accession No. ML15191A461)
6. Letter from M. B. Fields (NRC) to H. B. Ray (SCE) dated February 09, 1996; Subject: Issuance of Amendment for San Onofre Nuclear Generating Station, Unit No. 2 (TAC No. M86191) and Unit No. 3 (TAC No. M86192) (ADAMS Accession No. ML021990684)
7. License Amendments 188 and 175 and associated NRC safety evaluation issued to Zion Nuclear Power Station Units 1 and 2, respectively, dated January 14, 2015 (ADAMS Accession No. ML14295A716).

ATTACHMENT 1

Proposed Units 2 and 3 Technical Specification Mark-Up Pages

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TS 5.8	“High Radiation Areas”

(TSs not listed above are deleted in their entirety.)

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4.0 DESIGN FEATURES

4.3 Fuel Storage

Spent Fuel shall not be stored in the spent fuel pool.

~~4.3.1 Criticality~~

~~4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:~~

- ~~a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;~~
- ~~b. $K_{\text{eff}} < 1.0$ if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;~~
- ~~c. $K_{\text{eff}} \leq 0.95$ if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;~~
- ~~d. Three or five borated stainless steel guide tube inserts (GT-Insert) may be used. When three borated stainless steel guide tube inserts are used, they will be installed in an assembly's center guide tube, the guide tube associated with the serial number, and the diagonally opposite guide tube. Fuel containing GT-Inserts may be placed in Region I or Region II. However, credit for GT-Inserts is only taken for Region II storage.~~

~~— A five-finger CEA may be installed in an assembly. Fuel containing a five-finger CEA may be placed in either Region I or Region II. Credit for inserted 5-finger CEAs is taken for both Region I and Region II.~~

- ~~e. A nominal 8.85 inch center to center distance between fuel assemblies placed in Region II;~~
- ~~f. A nominal 10.40 inch center to center distance between fuel assemblies placed in Region I;~~
- ~~g. Prior to using the storage criteria of LCO 3.1.3 and LGS 4.0.100, the following uncertainties will be applied:
 - ~~(1) The calculated discharge burnup of San Onofre Units 2 and 3 assemblies will be reduced by 6.6%.~~
 - ~~(2) The calculated discharge burnup of San Onofre Unit 1 fuel assemblies will be reduced by 10.0%.~~~~

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8.1 Each high radiation area as defined 10 CFR 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a ~~Radiation Exposure Permit (REP)~~Radiation Work Permit (RWP) or equivalent.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable ~~REP~~RWP or equivalent.

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty, ~~or~~ radiation protection supervisor, or his or her designee. Doors shall remain locked except during periods of access by personnel under an approved ~~REP~~RWP or equivalent that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the ~~REP~~radiation work permit, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

ATTACHMENT 2

Proposed Unit 1 Technical Specifications Mark-up Pages

TS "TABLE OF CONTENTS"
TS D5 "DESIGN FEATURES"
TS D6.12 "High Radiation Areas"

(TS not listed above are deleted in their entirety.)

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1
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SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1
PERMANENTLY DEFUELED TECHNICAL SPECIFICATIONS

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SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1
PERMANENTLY DEFUELED TECHNICAL SPECIFICATIONS

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4.3 Fuel Storage

Spent Fuel shall not be stored in the spent fuel pool.

5.0 ADMINISTRATIVE CONTROLS~~D6.12.5.8~~ HIGH RADIATION AREA

~~D6.12.15.8.1~~ 5.8.1 Each high radiation area as defined in 10 CFR Part 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a ~~Radiation Exposure Permit (REP)~~ Radiation Work Permit (RWP) or equivalent.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable ~~REP~~ RWP or equivalent.

~~D6.12.25.8.2~~ 5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the ~~health physics~~ shift manager on duty, radiation protection supervisor, or his or her designee. Doors shall remain locked except during periods of access by personnel under an approved ~~REP~~ RWP or equivalent

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area (cont.)

that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the ~~REP~~RWP or equivalent, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

~~D6.12.3~~5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

~~SAN ONOFRE - UNIT 1~~ ~~D6.12-2~~ ~~AMENDMENT NO: 159~~

San Onofre

5.0-2

Unit 1 – Amendment XXX
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ATTACHMENT 3

Proposed Units 1, 2 and 3 Technical Specifications Clean-Typed Pages

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(TS not listed above are deleted in their entirety.)

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4.0 DESIGN FEATURES

4.3 Fuel Storage

Spent Fuel shall not be stored in the spent fuel pool.

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8.1 Each high radiation area as defined 10 CFR 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP) or equivalent.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable RWP or equivalent.

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty, radiation protection supervisor, or his or her designee. Doors shall remain locked except during periods of access by personnel under an approved RWP or equivalent that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the RWP or equivalent, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.
