

ENCLOSURE 2

Uncontrolled Sections

EVALUATION OF PROPOSED CHANGES

**Request for Approval of the SONGS Physical Security Plan,
Training and Qualification Plan, and Safeguards Contingency Plan and
Removal of the Cyber Security License Condition**

- 1.0 Regulatory Evaluation
 - 1.1 Applicable Regulatory Requirements/Criteria
 - 1.2 Significant Hazards Consideration
- 2.0 Environmental Consideration

ATTACHMENTS

- Attachment 2-1: Proposed Operating License Markup – Unit 2
- Attachment 2-2: Proposed Operating License Markup – Unit 3
- Attachment 2-3: Proposed Operating License Clean Pages – Unit 2
- Attachment 2-4: Proposed Operating License Clean Pages – Unit 3

NOTE: ~~ENCLOSURE 1 TO THIS LETTER CONTAINS "SECURITY RELATED INFORMATION" AND ENCLOSURES 3, 4, AND 5 TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION." THIS INFORMATION MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION FROM ENCLOSURES 1, 3, 4, AND 5, ENCLOSURE 2 IS "DECONTROLLED."~~

1.0 REGULATORY ANALYSIS

1.1 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

In accordance with the provisions of 10 CFR 50.4 and 50.90, Southern California Edison (SCE) is requesting amendments to the San Onofre Nuclear Generating Station (SONGS) Units 1, 2 and 3 Operating Licenses, with specific changes to the Units 2 and 3 Physical Protection License Conditions 2.E. The proposed amendments request approval of a new SONGS Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (the Plan). The proposed amendment also requests removal of the requirement for the Cyber Security Plan (CSP) in SONGS Units 2 and 3 License Condition 2.E.

1.2 No Significant Hazards Consideration

The Plan addresses the protection of material on site that is licensed by the SONGS Units 1, 2, and 3 Operating Licenses. The protection of material subject to the requirements of 10 CFR 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," is addressed in a separate plan. The Plan reflects the configuration of SONGS after all the spent nuclear fuel is stored at the ISFSI. The 10 CFR 50 licenses for SONGS Units 1, 2, and 3 no longer authorize operation of the reactors or emplacement or retention of fuel into the reactor vessel. SONGS has evaluated the proposed amendment 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 irradiated fuel at SONGS is currently stored in the Units 2 and 3 spent fuel pool (SFP) and at the SONGS Independent Spent Fuel Storage Installation (ISFSI). In this condition, the number of credible accidents/transients is significantly smaller than for a plant authorized to operate the reactor or emplace or retain fuel in the reactor vessel. In addition, the proposed Plan reflects the future site configuration where all the remaining spent fuel in the SFP has been moved to the ISFSI with no intention to return spent fuel to the SFP. In this configuration, the Fuel Handling Accident would no longer be credible. The probability and consequences of the remaining SONGS Updated Final Safety Analysis Report (UFSAR) Chapter 15 events are not significantly affected by the proposed changes to the existing Security Plan because the proposed changes have no effect on plant systems, structures, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed changes would not increase the likelihood of the malfunction of any plant SSC.

Therefore, the proposed amendments do not involve a significant increase in the probability or consequences of a previously evaluated accident.

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 amendments do not involve significant physical alteration of the plant. The proposed license amendments would not physically change any SSCs involved in the safe storage of spent fuel or the mitigation of any postulated accident. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed amendments do not create the possibility of a new failure mode associated with any equipment or personnel failures. The credible events for the ISFSI remain unchanged.

Therefore, the proposed amendments do 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

Because the 10 CFR Part 50 licenses for SONGS no longer authorize operation of the reactors or emplacement or retention of fuel into the reactor vessels, as specified in 10 CFR 50.82(a)(2), the occurrence of postulated accidents associated with reactor operation is no longer credible. With all nuclear spent fuel transferred out of wet storage from the spent fuel pools and placed in dry storage within the ISFSI, a fuel handling accident is no longer credible. The proposed amendments do not involve a change in the plant's design, configuration, or operation. There are no modifications associated with this proposed amendment that would affect either the way in which the plant SSCs perform their safety functions or their design margins.

Therefore, the proposed amendments do not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed amendments present 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.

2.0 ENVIRONMENTAL CONSIDERATION

SCE has evaluated these proposed 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 these proposed license amendments meet the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(12). 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 and relates solely to safeguards matters (i.e., protection against sabotage or loss or diversion of special nuclear material). In addition, this proposed license amendment involves the approval of a safeguards plan submitted in accordance with 10 CFR 72, and does not involve any significant construction impacts. The proposed license amendments would not physically change any SSCs involved in the safe storage of spent fuel or the mitigation of any postulated accident.

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

~~SECURITY RELATED INFORMATION - WITHHOLD UNDER 10 CFR 2.390~~

ENCLOSURE 2

Attachment 2-1

Proposed Operating License Changes – Unit 2
(Markup)

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~~SECURITY RELATED INFORMATION - WITHHOLD UNDER 10 CFR 2.390~~

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p) ~~provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).~~—The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: “San Onofre Nuclear Generating Station Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 20.” approved on _____ submitted by letter dated May 15, 2006. ~~SCE shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The SONGS CSP was approved by License Amendment No. 225 as supplemented by changes approved by License Amendments 231 and XXX.~~

Pursuant to NRC's Order EA-13-092, dated June 5, 2013, NRC reviewed and approved the license amendment 232 that permitted the security personnel of the licensee to possess and use certain specific firearms, ammunition, and other devices, such as large-capacity ammunition feeding devices, notwithstanding local, State, and certain Federal firearms laws that may prohibit such possession and use.

- F. This license is subject to the following additional condition for the protection of the environment:

Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

- G. DELETED

- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

- J. Deleted

*On September 29, 1983, the Safeguards Contingency Plan was made a separate, companion document to the Physical Security Plan pursuant to the authority of 10 CFR 50.54.

ENCLOSURE 2

Attachment 2-2

Proposed Operating License Changes – Unit 3
(Markup)

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Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to ~~provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).~~ 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 20," approved on _____, submitted by letter dated May 15, 2006. ~~SCE shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The SONGS CSP was approved by License Amendment No. 218, as supplemented by changes approved by License Amendments 224 and XXX.~~

Pursuant to NRC's Order EA-13-092, dated June 5, 2013, NRC reviewed and approved the license amendment 225 that permitted the security personnel of the licensee to possess and use certain specific firearms, ammunition, and other devices, such as large-capacity ammunition feeding devices, notwithstanding local, State, and certain Federal firearms laws that may prohibit such possession and use.

- F. This license is subject to the following additional condition for the protection of the environment:

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- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

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ENCLOSURE 2

Attachment 2-3

Proposed Operating License Changes – Unit 2
(Clean Pages)

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- E. SCE shall fully implement and maintain in effect all provisions of the Commission- approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," approved on _____.

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- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

- J. Deleted

*On September 29, 1983, the Safeguards Contingency Plan was made a separate, companion document to the Physical Security Plan pursuant to the authority of 10 CFR 50.54.

ENCLOSURE 2

Attachment 2-4

**Proposed Operating License Changes – Unit 3
(Clean Pages)**

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- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Physical Security Plan , Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0," approved on _____.

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