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June 4, 2019

10 CFR 50.59
10 CFR 50.71
10 CFR 72.48

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: **Docket Nos. 50-206, 50-361, 50-362, and 72-41
Facility Change Report, Summary Report of Commitment Changes, and
Cycle Specific Technical Specification Bases Page Updates
San Onofre Nuclear Generating Station (SONGS) Units 1, 2, 3, and the
Independent Spent Fuel Storage Installation**

Dear Sir or Madam:

The attached enclosures contain the Facility Change Report required by 10 CFR 50.59(d)(2) for San Onofre Nuclear Generating Station (SONGS) Units 1, 2 and 3, and by 10 CFR 72.48(d)(2) for the SONGS ISFSI during the reporting period from April 1, 2017 through April 1, 2019. The enclosed reports provide a brief description and summary of any 10 CFR 72.48 evaluations performed for the SONGS ISFSI (Enclosure 1). There were no 10 CFR 50.59 evaluations performed for SONGS Units 1, 2 or 3 during this time period. Complete change documentation for the SONGS 10 CFR 72.48 evaluations performed for the SONGS ISFSI is available onsite.

The letter also provides the report of the commitment changes following the guidance of Nuclear Energy Institute (NEI) 99-04, "Guidance for Managing NRC Commitment Changes" Revision 0, for the reporting period of April 1, 2017 through April 1, 2019. Enclosure 2 provides a list of the commitments that were changed and identified using the NEI 99-04 process as commitment changes that should be included in the NRC summary report. The 334 commitments identified in Enclosure 2 are no longer applicable due to the plants being in a shutdown condition. Enclosure 3 provides a list of the 26 commitments that are still applicable to SONGS as of April 1, 2019. SONGS continues to comply with these commitments

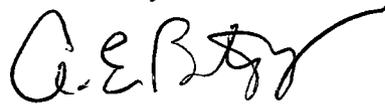
As required under SONGS Units 2 and 3 Technical Specification (TS) 5.4.4, changes to the SONGS Units 2 and 3 TS Bases made without prior Nuclear Regulatory Commission (NRC) approval are to be provided to the NRC on a frequency consistent with 10 CFR 50.71(e). The reporting period for the changes to the SONGS Units 2 and 3 TS Bases is from April 1, 2017 through April 1, 2019. Only one TS Bases change package was processed during this time frame. The affected TS Bases pages are provided in Enclosure 4 of this letter.

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This letter or the attached enclosures do not contain any new commitments.

Should you have any questions or require additional information, please contact me at (949) 368-6945.

Sincerely,

A handwritten signature in black ink, appearing to read "A. E. Bay". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

- Enclosures:
1. SONGS ISFSI 10 CFR 72.48 Evaluations Summaries For The Period From April 1, 2017 Through April 1, 2019
 2. List of Commitments No Longer Applicable to SONGS as of April 1, 2019
 3. List of Commitments Applicable to SONGS as of April 1, 2019
 4. SONGS Units 2 and 3 Revised Technical Specification Bases Changes for the Period from April 1, 2017 Through April 1, 2019

cc: S. Morris, Regional Administrator, NRC Region IV
M. G. Vaaler, NRC Project Manager, San Onofre Units 1, 2 and 3

ENCLOSURE 1

SAN ONOFRE NUCLEAR GENERATION STATION

ISFSI

FACILITY CHANGE REPORT (FCR)

10 CRF 72.48 EVALUATION SUMMARIES

FOR THE PERIOD

FROM APRIL 1, 2017 THROUGH APRIL 1, 2019

1. Change Number and Title: 1117-45514-2, SONGS HI-STORM UMAX Version MSE System ISFSI 10 CFR 72.212 Report

Description:

SONGS is utilizing the Holtec International (Holtec) Underground Maximum (UMAX) Storage System for the storage of the remaining SONGS Units 2 and 3 spent fuel at the expanded onsite Independent Spent Fuel Storage Installation (ISFSI). In a limited number of cases, the inputs to the generic analyses used to support the UMAX licensing bases (Certificate of Compliance and Final Safety Analysis Reports) did not fully bound or were inconsistent with SONGS site-specific conditions. In those cases, Regulatory Issue Summary 12-05 requires a review under 10 CFR 72.48 to be performed by the general licensee (SCE/SONGS). The following three issues were addressed in the evaluation.

The site-specific fire analysis increases the multi-purpose canister (MPC) temperature and pressure to values slightly higher than previously analyzed within the HI-TRAC in the HI-STORM FW FSAR. This increase was due to the consideration of additional combustibles potentially present. The generic analysis relies solely on 50 gallons of fuel.

At SONGS it is necessary to swap yokes while the HI-TRAC is placed on a shelf in the cask handling pool. During that swap, the HI-TRAC is unrestrained and could fall from the shelf into the cask handling pool during a seismic event. The lateral loading impact on the MPC within the overpack was not addressed in the UMAX licensing bases, (though was found to be acceptable using analyses developed and reviewed by the NRC in support of the licensing of the HI-STAR-190 transportation package). The lateral loading is addressed under 72.48 since the focus is the design functions of the MPC; not Part 50 Structures, Systems, and Components. The potential dose impacts were previously added to the SONGS UFSAR (authorized under 10 CFR 50.59). The potential impact on the cask handling pool floor was bounded by existing SONGS analysis performed for the drop of equivalent equipment during the previous TransNuclear loading campaigns. Note that while evaluation of this issue was included in the original 10 CFR 72.48 evaluation (1117-45514-2), that portion of the evaluation was later superseded by a 10 CFR 72.48 screen. Therefore, a summary of the 72.48 evaluation of this issue is not provided below.

The SONGS design and licensing basis postulated tornado borne missiles differ from those addressed in the HI-STORM FW FSAR. The SONGS missiles impart slightly higher kinetic energy to the various targets for moderate and small missile scope.

Evaluation Summary:

The Fire Hazards analyses summarized in the 72.212 Report addresses both transfer (pool to pad) and down-loading conditions. The equipment used to support those operations (Vertical Cask Transporter and HI-PORT) are the major sources of combustibles during transfer and on the pad. Site hazards during transfer were evaluated and appropriate administrative controls (limitations on content volumes and stand-off distance) are well-established and controlled throughout transfer operations. Once placed in the Vertical Ventilated Module (VVM) and the lids are in-place, there is minimal potential for impact on the MPC contained therein. Nevertheless, transient combustibles are generally prohibited and require explicit authorization if present. The results of the site-specific analysis conclude that the fire impact on the MPC's is bounded by other generic, NRC approved, condition evaluations.

The SONGS licensing basis tornado missile hazards required by the Units 2 and 3 UFSAR/Defueled Safety Analysis Report (DSAR) are generally bounded by the generic HOLTEC analysis in the associated storage system FSARs. Wind speed and pressure drop have considerable margin over the SONGS licensing basis. However, the spectrum of missiles postulated in the SONGS licensing basis is somewhat different. HOLTEC has previously evaluated a wider range of missiles as part of the implementation of their systems at other sites using the HI-STORM 100 and FW systems, as well as the HI-STORM UMAX system. The SONGS missile spectrum was bounded by this generic analysis. Further, the concrete monolith surrounding the VVM at SONGS limits the potential targets during storage and to the lids which are themselves quite robust structurally. Tornado missile impacts are not a significant threat to the integrity of the VVM. During transfer operations, the HI-TRAC on the HI-PORT is evaluated for both penetrations and tip-over. These evaluations demonstrate the capacity of the HI-TRAC to remain on the HI-PORT and withstand such missile impacts.

Therefore, the proposed activities may be implemented without obtaining an amendment to the license or CoC.

2. Change Number and Title: 0618-48522-5, Revised Minimum Thread Engagement for Mating Device Bolted Joints

Description:

Bolted joints connect the HI-TRAC to the Mating Device, the Mating Device to the Adapter and the Adapter to the Cavity Enclosure Container. This stack-up supports the HI-TRAC and must be capable of withstanding a full range of design loading conditions. The engagement of the bolts at each joint are integral to the strength of the joint and affects the safety factor of the bolt under design loading conditions. This change adopts reduced thread engagement for the HI-TRAC to Mating Device joint from 2.5" to 1.625" based on a site-specific analysis to support a "use-as-is disposition" of a non-conforming condition.

Evaluation Summary:

The design function is to provide structurally adequate/capable joints to sustain the stack-up during various design basis events. Analysis demonstrates that the reduced thread engagement provides an adequate factor of safety in support of this function. Therefore, the change has no substantive adverse impacts to design functions, and does not require a license amendment under 72.48(c)(i-viii).

3. Change Number and Title: 0119-53878-5, Load Monitoring System (LMS) Unavailability

Description:

Via a separate activity, SCE has installed an LMS on the Vertical Cask Transporter used to support canister transport and down-loading on the SONGS Independent Spent Fuel Storage

Installation. The installation of the LMS was authorized using a 72.48 screen. Following installation of the LMS, a separate activity was proposed to provide administrative controls (procedural steps) outlining appropriate actions to take should the LMS fail during down-loading operations. These administrative controls were then described in the 72.212 Report. The proposed activity summarized below includes changes to the 72.212 Report and associated administrative controls outlining appropriate actions to take should the LMS fail during down-loading operations.

Evaluation Summary:

The procedure change was implemented to provide actions to take should the LMS fail during downloading operations. There is not a more than minimal increase in the consequences of this malfunction of equipment important to safety, nor is there a malfunction with a different result due to these pre-planned actions.

ENCLOSURE 2

LIST OF COMMITMENTS NO LONGER APPLICABLE TO
SAN ONOFRE NUCLEAR GENERATING STATION
AS OF APRIL 1, 2019

Commitment Number	Verbatim Commitment to NRC	Commit Source
2014-10-002	SCE will implement a routine activity to periodically operate the spent fuel purification pumps. Initial operation will be performed prior to end of year.	SCE to NRC LTR 10/27/2014
2010-09-007	By December 31, 2012, Condition Assessment Plan(s) Develop or identify existing condition assessment plans that will provide reasonable assurance of integrity of components within the additional scope of the Underground Piping and Tanks Integrity Initiative. These plans shall include the following key attributes: Identification of underground piping and tanks to be assessed Potential assessment techniques. Assessment schedules that take into account the relative priority of components. This schedule should be coordinated with the schedule developed for the original Buried Piping Integrity Initiative to ensure that the components with the highest overall priority are addressed first. Assessment of cathodic protection, if applicable	SCE to NEI LTR 06/28/2010
2010-08-029	The following compensatory measures apply to the Unit 3 Cycle 16 refueling only since Unit 3 steam generator replacement is planned for this outage: There are to be no load movements by the service crane over the switchyard.	SCE to NRC LTR 08/16/2010
2010-08-028	The following compensatory measures apply to the Unit 3 Cycle 16 refueling only since Unit 3 steam generator replacement is planned for this outage: Work controls to be in place to lay the service crane boom down prior to severe weather.	SCE to NRC LTR 08/16/2010
2010-08-027	The following compensatory measures apply to the Unit 3 Cycle 16 refueling only since Unit 3 steam generator replacement is planned for this outage: A Unit 3 Cycle 16 shutdown qualitative risk assessment to be performed to provide qualitative risk management actions to demonstrate acceptable outage risk during construction, use, and deconstruction or the OLS.	SCE to NRC LTR 08/16/2010

Commitment Number	Verbatim Commitment to NRC	Commit Source
2010-08-026	The following compensatory measures apply to the Unit 3 Cycle 16 refueling only since Unit 3 steam generator replacement is planned for this outage: SONGS NUREG 0612 heavy loads procedural requirements are to be implemented for both the OLS and the service crane to ensure safe load paths are followed, or safe shutdown equipment is taken out of service, during the rigging activity.	SCE to NRC LTR 08/16/2010
2010-08-025	The following compensatory measures apply to the Unit 3 Cycle 16 refueling only since Unit 3 steam generator replacement is planned for this outage: OLS construction, use, and removal to be limited to specific outage windows to reduce risk to the Unit 3 Tn A diesel generator cables.	SCE to NRC LTR 08/16/2010
2010-08-024	The following compensatory measures apply to the Unit 3 Cycle 16 refueling only since Unit 3 steam generator replacement is planned for this outage: Rigging activities to be limited to one end of the steam generator replacement outside lift system (OLS) to limit potential impact to Unit 3 Tn A diesel generator cables located underground near the containment equipment hatch.	SCE to NRC LTR 08/16/2010
2010-08-023	Bus outages are to be performed during the core offload window, when all fuel is removed from the reactor vessel.	SCE to NRC LTR 08/16/2010
2010-08-022	Outage Unit Compensatory Measures Develop a plan to effect an emergency return to service, if required to support the operating unit.	SCE to NRC LTR 08/16/2010
2010-08-021	Outage Unit Compensatory Measures Scheduling: Work the supply cubicles and cross-tie cubicle bottle replacements first, allowing for a quicker emergency return to service.	SCE to NRC LTR 08/16/2010
2010-08-020	Outage Unit Compensatory Measures: Establish Switchyard Restricted Access, during the once-per-tn 10-day Completion Time for one offsite power source inoperable.	SCE to NRC LTR 08/16/2010
2010-08-019	Outage Unit Compensatory Measures Protect all available tn safety function equipment CCW (component cooling water), SWC (saltwater cooling), SDC (shutdown cooling), and SFP (Spent Fuel Pool) cooling.	SCE to NRC LTR 08/16/2010

Commitment Number	Verbatim Commitment to NRC	Commit Source
2010-08-018	Outage Unit Compensatory Measures Protect the available tn onsite source, EDG and 4.16 kV bus.	SCE to NRC LTR 08/16/2010
2010-08-017	Outage Unit Compensatory Measures Protect the available tn offsite source: via switchyard barriers and 4.16 kV cross-tie breaker barriers.	SCE to NRC LTR 08/16/2010
2010-08-016	Online Unit Compensatory Measures - On-Line Unit (MODES 1 to 4) Do not allow any switchyard work, or tn work on the protected tn.	SCE to NRC LTR 08/16/2010
2010-08-015	Online Unit Compensatory Measures - On-Line Unit (MODES 1 to 4) Protect switchgear room normal HVAC cooling unit and exhaust fan.	SCE to NRC LTR 08/16/2010
2010-08-014	Online Unit Compensatory Measures - On-Line Unit (MODES 1 to 4) Protect all 3 AFW pumps	SCE to NRC LTR 08/16/2010
2010-08-013	Online Unit Compensatory Measures - On-Line Unit (MODES 1 to 4) Ensure common equipment (1E 480 VAC buses, emergency chillers, control room emergency cooling units) are aligned to the on-line unit.	SCE to NRC LTR 08/16/2010
2010-08-012	Online Unit Compensatory Measures - On-Line Unit (MODES 1 to 4) Ensure the protected tn is the tn with the Operable 4.16 kV cross-tie.	SCE to NRC LTR 08/16/2010
2010-08-011	Online Unit Compensatory Measures - On-Line Unit (MODES 1 to 4) Protect both onsite sources-Perform Surveillances on the operating unit EDGs prior to entering Action Statement, and protect the available switchgear room.	SCE to NRC LTR 08/16/2010
2010-08-010	Online Unit Compensatory Measures - On-Line Unit (MODES 1 to 4) Protect the available offsite source: via switchyard barriers and 4.16 kV cross-tie breaker breaker barriers.	SCE to NRC LTR 08/16/2010
2010-01-001	SONGS will continue to implement revised applicability of Technical Specifications that are pertinent to the movement of fuel assemblies using administrative controls in accordance with NRC Administrative Letter 98-10. Due: Until NRC completes its review and issues revised technical specification pages.	SCE to NRC LTR 01/14/2010

Commitment Number	Verbatim Commitment to NRC	Commit Source
2009-12-006	SCE will continue to participate in the development of guidance relative to the transport of gas voids in suction piping to the ECCS pumps and will re-perform the analysis, once the guidance is finalized. SCE will provide a supplemental response with the results of the re-analysis.	SCE to NRC LTR 12/22/2009
2009-11-002	Reference 3 and this supplemental response credit the replacement of Units 2 and 3 steam generators. The Unit 2 replacement steam generators are being installed during the ongoing cycle 16 refueling outage	SCE to NRC LTR 11/12/2009
2009-06-001	Removal of the plant-specific Technical Specification requirements will be performed concurrently or subsequent to implementation of 10 CFR Part 26, Subpart I requirements. This commitment will be completed no later than October 1, 2009 or within 60 days Techni Specification approval, whichever is later.	SCE to NRC LTR 06/10/2009
2009-02-001	The replacement steam generators are to be installed during the U2 Fuel Cycle 16 refueling outage, currently scheduled to begin in September 2009 and the U3 Fuel Cycle 16 refueling outage, currently scheduled to begin in October 2010.	SCE to NRC LTR 02/23/2009
2008-10-009	SCE is committing in this submittal to completing a chemical effects retest program, and identifying any additional required plant modifications, by November 20, 2009.	SCE to NRC LTR 10/30/2008
2008-10-008	SCE will conduct confirmatory walkdowns as identified in Item 6 of the Design Evaluation for Unit 3 accessible and inaccessible piping and submit a Nine-Month supplemental response with the results of these walkdowns and any resulting corrective actions.	SCE to NRC LTR 10/14/2008
2008-10-007	SCE will conduct confirmatory walkdowns as identified in Item 6 of the Design Evaluation for Unit2 accessible and inaccessible piping and submit a Nine-Month supplemental response with the results of these walkdowns and any resulting corrective actions.	SCE to NRC LTR 10/14/2008

Commitment Number	Verbatim Commitment to NRC	Commit Source
2008-10-006	SCE is continuing to support the industry and NEI Gas Accumulation Management Team activities regarding the resolution of generic TS changes via the TSTF traveler process. Following NRC approval of this TSTF, SCE will evaluate adopting the TSTF to either supplement or replace current TS and LCS requirements.	SCE to NRC LTR 10/14/2008
2008-10-004	A vent valve will be added to the Tn "A" discharge piping of the high pressure safety injection pumps in each unit. Due: U2C16 and U3C16 outages scheduled for the fall of 2009 and 2010, respectively.	SCE to NRC LTR 10/14/2008
2008-10-001	Tech Spec Bases for SR 3.5.2.4 will be revised to read "Maintaining the piping from the RWST to the RCS full of water" 90 days after completion of the Unit 3 Cycle 15 Refueling outage (scheduled for October 2008)	SCE to NRC LTR 10/14/2008
2008-09-006	Prior to implementation of SONGS' proposed Emergency Plan Change, SCE will: 5) Change the facility activation requirements for the Operations Support Center to include the additional 90 minute responders described in the above items 1, 2 and 3.	SCE to NRC LTR 09/24/2008
2008-09-005	Prior to implementation of SONGS' proposed Emergency Plan Change, SCE will: Ensure that either an I&C Technician or a Shift Rotating General Foreman (SRGF) is on-shift at all times	SCE to NRC LTR 09/24/2008
2008-09-004	Prior to implementation of SONGS' proposed Emergency Plan Change, SCE will Add one (1) Instrument and Control Technician to the automatic recall system.	SCE to NRC LTR 09/24/2008
2008-09-003	Prior to implementation of SONGS' proposed Emergency Plan Change, SCE will Add one (1) Electrical Maintenance Technician, to the automatic recall system.	SCE to NRC LTR 09/24/2008
2008-09-002	Prior to implementation of SONGS' proposed Emergency Plan Change, SCE will Add nine (9) qualified Health Physics (HP) Technicians, to the automatic recall system.	SCE to NRC LTR 09/24/2008
2008-06-001	The proposed steam generator plugging criterion is a preliminary value and SCE will provide a confirmation or a corrected value when the calculation is approved.	SCE to NRC LTR 06/27/2008

Commitment Number	Verbatim Commitment to NRC	Commit Source
2008-05-003	SCE will submit a response within nine months of the date of the Generic Letter providing the results of the evaluation, identifying required confirmatory walkdowns that have not been completed, and providing the schedule for their completion.	SCE to NRC LTR 05/15/2008
2008-05-002	Where additional vent valves are deemed to be required, confirmatory walkdowns will be conducted to verify the need for additional vents.	SCE to NRC LTR 05/15/2008
2008-05-001	An assessment of the system piping to confirm adequate vent capability will be performed in order to assure successful management of gas accumulation volumes. Potential gas accumulation volumes will be determined by conservatively applying construction tolerances to the plant isometric drawings.	SCE to NRC LTR 05/15/2008
2007-11-011	Equipment that will be used to monitor float current will have the necessary accuracy and capability to monitor electrical current in the expected range.	SCE to NRC LTR 11/30/2007
2007-08-002	SCE will relocate specific gravity monitoring to the proposed Battery Monitoring and Maintenance Program. The specific gravity monitoring will be performed prior to each battery discharge test.	SCE to NRC LTR 08/10/2007
2007-08-001	SCE is making a regulatory commitment to maintain a capacity margin (presently 2%) to account for the uncertainty in the battery capacity assigned by the manufacturer associated with the allowed float current limit (presently 1.5 amps) for 1800 amp-hour (AH) batteries. This new commitment will be added to the list of regulatory commitments in the revised submittal. The Licensee Controlled Specification (LCS) will require 0.75 amps or less charging current for the 1260 AH batteries until they are upgraded to 1800 AH batteries.	SCE to NRC LTR 08/10/2007
2007-03-007	Notify me [Jim Dyer, NRC] in writing when you have completed the actions and commitments addressed in this Confirmatory Action letter.	SCE to NRC LTR 03/22/2007
2007-03-003	The NRC will be informed if SCE revises the commitment to the enhanced leakage monitoring program described herein or the commitment to have all pressurizer DMWs compliant with MRP-139, prior to operation after 12/31/2007.	SCE to NRC LTR 03/07/2007

Commitment Number	Verbatim Commitment to NRC	Commit Source
2007-03-002	SCE is committing for SONGS U2 and U3 to implement an interim enhanced leakage monitoring program not later than 3/2/2007, that will remain in effect until the unit meets the MRP-139 requirements for pressurizer DMWs.	SCE to NRC LTR 03/07/2007
2006-10-004	A report that summarizes the results of the examinations will be submitted to the NRC within fourteen days of completion of the final UT examination. The report will include the following details as applicable, a listing of indications detected, the disposition of all indications using the standards of ASME Section XI, IWB-3514-2 and/or IWB-3514-3 criteria, the type and nature of the indications, and a discussion of any repairs to the overlay material and/or base metal and the reason for the repair.	SCE to NRC LTR 10/23/2006
2006-10-003	SCE will coordinate with the EPRI NDE Center in developing techniques and a qualification process to address this examination.	SCE to NRC LTR 10/23/2006
2006-05-002	INSPECTION RESULTS WILL BE INCLUDED IN THE 60-DAY POST REFUELING OUTAGE INSPECTION REPORT REQUIRED BY NRC ORDER EA-03-009.	SCE to NRC LTR 05/11/2006
2006-05-001	IF THE ESTABLISHED INSPECTION CRITERION IS EXCEEDED, SCE WILL PERFORM ADDITIONAL REPAIRS ON CEDM # 56.	SCE to NRC LTR 05/11/2006
2006-02-004	Promulgate LCS for upgrade of the battery maintenance practices to conform to industry standard IEEE 450-2002.	SCE to NRC LTR 03/30/2007
2006-02-003	Appropriate design features will be added to measure float charging current when a swing battery charger is aligned to a Class 1E subsystem battery.	SCE to NRC LTR 03/30/2007
2006-02-002	Relocate the requirements of existing SRs 3.8.4.2, 3, 4, 5 from TS to the LCS.	SCE to NRC LTR 03/30/2007
2005-12-001	SCE is committing to follow the NRC's condition of approval of ASME Code Case N-638-1 as described in the Regulatory Guide 1.147. "UT examinations shall be demonstrated for the repaired volume using representative samples which contain construction type flaws. The acceptance criteria of NB-5330 of Section 111 edition and addenda approved in 10 CFR 50.55a apply to all flaws identified within the repaired volume."	SCE to NRC LTR 12/23/2005

Commitment Number	Verbatim Commitment to NRC	Commit Source
2005-07-005	The maximum rod average burnup is limited to 60 GWD/MTU for ZIRLO clad fuel assemblies.	SCE to NRC LTR 553 -7/18/2005
2005-07-004	The corrosion limit as predicted by the best-estimate model is limited to below 100 microns for all location of the fuel for ZIRLO clad fuel assemblies.	SCE to NRC LTR 553 -7/18/2005
2005-07-003	Revise the San Onofre Units 2 and 3 Updated Final Safety Analysis Report as needed to reflect the changes contained with the Technical Specification changes in PCN-553 to allow the use of ZIRLOTM fuel cladding material. The changes shall include, but are not limited to, the following: A. The corrosion limit as predicted by the best-estimate model is limited to below 100 microns for all locations of the fuel for ZIRLOTM clad fuel assemblies. B. The maximum rod average burnup is limited to 60 GWD/MTU for ZIRLOTM clad fuel assemblies. C. Chapter 1 and Chapter 4 will be revised as necessary to reflect the manufacturing and implementation of ZIRLOTM clad fuel rods. D. The applicable sections of Chapter 6 and Chapter 15 will be revised to reflect the re-analysis performed for the ZIRLOTM cladding material.	SCE to NRC LTR 553 -7/18/2005
2005-07-002	The baseline FDI _m for SONGS will remain unchanged during the process of collecting additional data to support increasing the FDI _m . The restriction on the FDI _m for SONGS will be lifted only after consultation with the NRC. CE 16x16 ZIRLOS oxide measurement data used to compare with the expected behavior will be shared with the NRC. The 100 micron oxide limit will be met regardless of the limit imposed on FDI _m .	SCE to NRC LTR 553 -7/18/2005
2005-07-001	1) SCE will restrict the modified Fuel Duty Index of each ZIRLO clad fuel pin to 110% of the established SONGS specific FDI _m limit of 586 except under the following condition: proceeding 110% limit may be exceeded for a fraction of the fuel pins in up to eight (8) fuel assemblies. For these eight fuel assemblies, SCE will restrict the fuel duty of ZIRLO clad fuel pins to 120% of the SONGS plant specific FDI _m limit.	SCE to NRC LTR 553 -7/18/2005

Commitment Number	Verbatim Commitment to NRC	Commit Source
2005-05-005	SCE will use our self-assessment program to document and evaluate any unexpected problems with the Delta Suit and report any suit defects in a timely manner to the United States nuclear industry through our Operating Experience process and to the manufacturer.	SCE to NRC LTR 05/11/2005
2005-05-004	Air hoses of any length can be used, but air shall be supplied to the Delta Suit at 87 psig +/- 10% in accordance with the manufacturer's "MTH2, Instructions for Use,": dated 12/00. The Delta Suit can be fitted with CEJN fittings used at SONGS.	SCE to NRC LTR 05/11/2005
2004-12-002	SCE is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each endar month) that is described in Generic Letter 97-02 Revised Contents of the Monthly Operating Report, by the last day of the month following the end of each endar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).	SCE to NRC LTR 12/27/2004
2004-12-001	SCE has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at SONGS 2 & 3 and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be included in the Licensee Controlled Specifications. This regulatory commitment will be implemented within 60 days of approval of this amendment request.	SCE to NRC LTR 12/10/2004
2004-08-005	The applicable sections of Chapter 6 and Chapter 15 will be revised to reflect the re-analysis performed for the ZIRLO cladding material.	SCE to NRC LTR 08/26/2004
2004-08-004	Chapter 1 and Chapter 4 will be revised as necessary to reflect the manufacturing and implementation of ZIRLO clad fuel rods.	SCE to NRC LTR 08/26/2004

Commitment Number	Verbatim Commitment to NRC	Commit Source
2004-08-003	The maximum rod average burnup is 60 GWD/MTU for ZIRLO clad fuel assemblies.	SCE to NRC LTR 08/26/2004
2004-08-002	Corrosion limit as predicted by the best-estimate model is limited to below 100 microns for all locations of the fuel for ZIRLO clad fuels assemblies.	SCE to NRC LTR 08/26/2004
2004-08-001	Revise the U2 & U3 UFSAR as needed to reflect the changes contained with the TS changes in PCN-553 to allow the use of ZIRLO fuel cladding material.	SCE to NRC LTR 08/26/2004
2003-11-001	Schedule for Submittal of Generic Control Room Habitability NRC Generic Letter 2003-01, "Control Room Habitability" SCE will submit a proposed TS change within 90 day	SCE to NRC LTR 11/26/2003
2003-08-005	To ensure that the San Onofre Units 2 and 3 technical specifications verify the integrity of the CRE and the assumed inleakage rates of potentially contaminated air, SCE will submit a License Amendment Request (LAR) to revise TS 3.7.11 by December 9, 2003 (i.e., within 180 days after the issuance of Generic Letter 2003-01). The revised TS 3.7.11 will include surveillance requirements to verify CRE integrity and to confirm that the CRE inleakage rates assumed in the design basis radiological and hazardous chemical analyses are greater than tested inleakage rates. The revised TS 3.7.11 and all necessary modifications to the CRE to demonstrate compliance with the revised TS 3.7.11 would be implemented within 60 days after the completion of baseline inleakage testing described in the responses to Items (1)(a) and (1)(b), or within 60 days of approval of the LAR, whichever is later.	SCE to NRC LTR 08/05/2003
2003-08-004	To ensure that the most limiting inleakage into the CRE is considered in the hazardous chemical analyses, SONGS U2 & U3 will perform CRE inleakage testing.	SCE to NRC LTR 08/05/2003

Commitment Number	Verbatim Commitment to NRC	Commit Source
2003-08-003	SCE will revise the radiological analyses to model a greater inleakage value and perform CRE inleakage testing. Increasing the inleakage value will provide a more realistic acceptance criterion for inleakage testing. The revised analyses and CRE inleakage testing will be completed prior to the Unit 3 Cycle 13 outage that is currently scheduled to begin in September 2004. Following the completion of inleakage testing, SCE will submit a letter describing how and when the analyses, tests, and measurements were performed and the results of the testing in order to demonstrate whether the most limiting inleakage into the CRE is no more than the value assumed in the revised design basis radiological analyses for control room habitability.	SCE to NRC LTR 08/05/2003
2003-08-002	SCE will submit a letter by December 9, 2003 (i.e., within 180 days after the issuance of Generic Letter 2003-01) to describe the applicable habitability regulatory requirements (e.g., GDC 1, 3, 4, 5, and 19) for the San Onofre Units 2 and 3 control rooms and how the Control Room Habitability Systems (CRHSs) are designed, constructed, configured, operated, and maintained in accordance with the facility design and licensing bases.	SCE to NRC LTR 08/05/2003
2003-02-001	On February 11, 2003, the NRC issued an immediately effective order establishing interim inspection requirements for reactor vessel heads at pressurized water reactors (Reference 3). By March 3, 2003, SCE will respond to this order in the context of the future inspections of the San Onofre Unit 2 and 3 reactor vessel heads at their next refueling outages.	SCE to NRC LTR 02/14/2003
2002-12-001	SCE is committing to notify the SONGS NRC Project Manager prior to completing the UT inspection if SCE does not achieve an inspection scope of one inch above the indicated top of the weld.	SCE to NRC LTR 12/31/2002

Commitment Number	Verbatim Commitment to NRC	Commit Source
2002-04-002	SCE will perform either qualified volumetric inspection, or a qualified wetted surface inspection on all of the 102 RPVH penetrations. The inspection techniques that will be applied to the inside diameter of the RPVH penetrations have been successfully demonstrated on the EPRI mock-ups that were constructed in support of Generic Letter 97-01. SCE will apply the acceptance criteria contained in a letter from the NRC staff to the Nuclear Energy Institute (NEI)	SCE to NRC LTR 04/02/2002
2002-04-001	SCE plans to perform an effective visual inspection of 100 percent power of the RPVH nozzle penetrations that is capable of detecting and discriminating small amounts of boric acid deposits from nozzle leaks.	SCE to NRC LTR 04/02/2002
2001-01-003	SCE has established the capability to monitor radioactive iodine that have been released to offsite environs. This capability is described in our site procedures. The capability to monitor radioactive iodine is considered a regulatory commitment.	SCE to NRC LTR 01/11/2001
2001-01-002	The capability for classifying fuel damage events at the Alert level threshold has been established for San Onofre at radioactivity levels of 300 mCi/gm dose equivalent iodine. This capability is described in emergency plan implementing procedures and has been implemented. The capability for classifying fuel damage events is considered a regulatory commitment.	SCE to NRC LTR 01/11/2001
2000-07-001	SCE is committing to measure total CEA group worth of at least 3000 pcm each refueling outage.	SCE to NRC LTR - 7/07/2000
2000-03-001	SONGS commits to monitor the impact of the Proposed AOT Change. The risk-informed TS change will be implemented consistent with the SONGS TS requirements and using the Configuration Risk Management Program as documented in plant procedure SO23-XV-50.	SCE to NRC LTR 03/30/2000

Commitment Number	Verbatim Commitment to NRC	Commit Source
1999-09-005	SCE will develop and proceduralize a schematic to determine an MOV test interval that is based on IDP final risk ranking, available valve margin, and valve performance history. The schema will be comprised of an evaluation of risk ranking, relative margin, and group as well as individual valve performance.	SCE to NRC LTR 9/28/1999
1999-09-004	Work toward the development of a mitigation technique.	SCE to NRC LTR 09/24/1999
1999-09-003	Keep the NRC informed of the future plans for eddy current exams at U3 on a cycle by cycle basis	SCE to NRC LTR 09/24/1999
1999-09-002	Perform visual inspections of the periphery reactor vessel head penetration nozzles during each refueling outage for both U2 and U3	SCE to NRC LTR 09/24/1999
1999-09-001	Maintain the commitment to perform eddy current examinations of 100% of the reactor vessel head penetrations at San Onofre Unit 3 at a time that meets the objectives stated above	SCE to NRC LTR 09/24/1999
1999-07-001	SCE will provide the results of the pressure-locking thrust prediction methodology to the NRC along with any recommended actuator margin requirements, any limitations associated on the use of the methodology and any diagnostic test equipment accuracy considerations by December 15,1999.	SCE to NRC LTR 07 07/21/1999
1999-01-004	Work toward the development of a mitigation technique.	SCE to NRC 01/13/1999
1999-01-003	Keep the NRC informed of future plans for eddy current exams at U3 on a cycle by cycle basis	SCE to NRC 01/13/1999
1999-01-002	Continue to perform visual inspection of periphery reactor vessel head penetration nozzles during each refueling outage for U2 and U3.	SCE to NRC 01/13/1999
1999-01-001	Perform eddy current exams of 100% of reactor vessel head penetrations at U3 at an appropriate time.	SCE to NRC 01/13/1999

Commitment Number	Verbatim Commitment to NRC	Commit Source
1997-10-002	Current information for San Onofre Units 2 and 3 will be provided to confirm the adequacy of the net positive suction head (NPSH) available for emergency core cooling (including decay heat removal) and containment heat removal pumps.	SCE to NRC LTR 10/24/1997
1997-10-001	As requested in Generic Letter (GL) 97-04, Southern California Edison (SCE) will submit the information requested in GL 97-04 by January 5, 1998.	SCE to NRC LTR 10/24/1997
1997-08-001	Edison is committing to perform inspections of the Unit 3 Vessel Head Penetration (VHP) nozzles during the Unit 3 Cycle 10 refueling outage.	SCE to NRC LTR 08/06/1997
1997-03-003	All valve factor dependent valves (i.e., gate valves) within the program population considered to have a low thrust and/or valve factor margin will be fully stroked dynamically (if practicable) at an interval no greater than three refueling cycles. The diagnostic test equipment utilized should provide a quantitative verification of the motor actuator output thrust and torque as well as system parameters of pressure and flow (if available) in order to provide a basis for determining valve factor. Results of the dynamic testing will be evaluated by the MOV Test Data Reconciliation Procedure.	SCE to NRC LTR 03/13/1997
1997-03-002	All safety-related MOVs within the GL 89-10 MOV program scope will be fully stroked statically at an interval no greater than three refueling cycles with a diagnostic device that provides a quantitative verification of the motor actuator thrust and/or torque output. This testing will be performed in conjunction with the scheduled periodic maintenance activities on the valves and includes (when possible) an as-found and as-left test. Results of the static testing will be evaluated by the MOV Test Data Reconciliation Procedure.	SCE to NRC LTR 03/13/1997

Commitment Number	Verbatim Commitment to NRC	Commit Source
1997-03-001	<p>A surveillance test of all safety-related MOVs within the GL 89-10 MOV program scope will be performed at an interval no greater than one refueling cycle. Verification of each valve to successfully complete a full open and close stroke will be provided as a result of this test and documented as part of the current In Service Testing Program.</p>	SCE to NRC LTR 03/13/1997
1997-02-007	<p>For those penetrations which rely on relieving paths with intervening valves, specific administrative controls will be implemented to ensure that these valves will remain open throughout Modes 1 through 4, or that compensatory measures are taken to provide overpressure protection in the event of their closure. The procedures for both Units 2 and 3 will be revised prior to returning Unit 2 to service from the current refueling outage. These procedures will be fully implemented at Unit 2 prior to returning Unit 2 to service from the current refueling outage. The Unit 3 procedures that require containment entry, or are associated with design changes, will be implemented by the end of the next refueling outage, which is currently scheduled to start on April 12, 1997.</p>	SCE to NRC LTR 02/03/1997
1997-02-006	<p>The five penetrations in each unit which require modification will be upgraded during each unit's cycle 9 refueling outage. The modifications consist of adding thermal insulation on Penetrations 42 and 43, removing and modifying thermal insulation on Penetrations 45 and 46, and adding a relief valve on the piping inside containment for Penetration 11. These physical changes will be completed at Unit 2 prior to return to service from the current refueling outage and at Unit 3 before the unit is returned to service from the next refueling outage, which is currently scheduled to start on April 12, 1997.</p>	SCE to NRC LTR 02/03/1997

Commitment Number	Verbatim Commitment to NRC	Commit Source
1997-02-005	Relief valves that are being credited to protect penetrations from overpressure will be added to the Inservice Testing (IST) program by the end of the next Unit 3 refueling outage, which is scheduled to begin on April 12, 1997. All required testing in accordance with the IST program will be complete at Unit 2, as practical, prior to the return to service from the current refueling outage and at Unit 3 during the next refueling outage, which is scheduled to begin on April 12, 1997. As stated in the report, Edison will approve all calculations prior to returning Unit 2 to service from the current refueling outage. These calculations will be maintained onsite, available for review. We will inform the NRC if our conclusions or our proposed corrective actions change.	SCE to NRC LTR 02/03/1997
1997-02-004	Procedural changes are being made to ensure that containment penetrations are not isolated from credited relief paths without compensating actions. The procedures for both Units 2 and 3 will be revised prior to returning Unit 2 to service from the current refueling outage. These procedures will be fully implemented at Unit 2 prior to returning Unit 2 to service from the current refueling outage. The Unit 3 procedures that require containment entry, or are associated with design changes, will be implemented by the end of the next refueling outage, which is currently scheduled to start on April 12, 1997.	SCE to NRC LTR 02/03/1997
1997-02-003	Four of the remaining five penetrations and their respective piping systems, although they are demonstrated to be operable based on accumulated leak rate testing data, require changes in insulation to eliminate the need to take credit for valve leakage. These modifications will be completed in Unit 2 prior to the return to service from the current refueling outage and will be completed in Unit 3 during the next refueling outage, which is scheduled to begin on April 12, 1997.	SCE to NRC LTR 02/03/1997
1997-02-002	Enhancements to the Emergency Operating Instructions for both Units 2 and 3 will be implemented prior to returning Unit 2 to service from the current refueling outage.	SCE to NRC LTR 02/03/1997

Commitment Number	Verbatim Commitment to NRC	Commit Source
1997-02-001	A design change to delay the restart of the ECUs following a safety injection actuation signal has been implemented in Unit 2 and will be implemented in Unit 3 during the Cycle 9 refueling outage , which is scheduled to begin on April 12, 1997.	SCE to NRC LTR 02/03/1997
1997-01-001	Edison will submit the 120 day response by February 4, 1997.	SCE to NRC LTR GL96-06 01/28/1997
1996-11-001	Edison will review the current MOV verification program to determine if any changes are appropriate based on GL 96-05 and will submit a written summary description of the MOV periodic verification program by March 17, 1997.	SCE to NRC LTR 11/14/1996
1996-10-002	If piping systems that penetrate the containment are susceptible to thermal expansion of fluid so that overpressurization of piping could occur.	SCE to NRC LTR 10/30/1996
1996-10-001	If containment air cooler cooling water systems are susceptible to either waterhammer or two-phase flow conditions during postulated accident conditions	SCE to NRC LTR 10/30/1996
1996-05-001	Having the ability to perform the 480V transformer replacement during plant operation would be cost effective. Therefore, Edison will be requesting approval of this change as a Cost Beneficial License Action.	SCE to NRC LTR 05/14/1996
1996-04-006	The review and modification of surveillance procedures, as necessary, for complete testing to comply with the TS will be completed for Units 2 and 3 prior to startup from the SONGS Unit 2 Cycle 10 refueling outage and prior to the SONGS Unit 3 Cycle 9 refueling outage, respectively.	SCE to NRC LTR 04/18/1996
1996-04-005	All channels of reactor protective system and ESF actuation logic for one unit will be reviewed.	SCE to NRC LTR 04/18/1996
1996-04-004	Third-of-a-kind (or swing) pump and valve logic will be reviewed for one unit.	SCE to NRC LTR 04/18/1996

Commitment Number	Verbatim Commitment to NRC	Commit Source
1996-04-003	Where dual tn redundancy occurs, one tn will be reviewed.	SCE to NRC LTR 04/18/1996
1996-04-002	The affected systems and procedures for one unit will be reviewed.	SCE to NRC LTR 04/18/1996
1996-04-001	Since San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 have the same TS, surveillance procedures, and logic for the GL 96-01 affected systems, the following review methodology will be used:	SCE to NRC LTR 04/18/1996
1995-04-001	Consistent with our contractual obligations with CE and consistent with the April 4, 1995 letter that Richard S. Siudek (CE/ABB) sent to William T. Russell (USNRC) (Reference 6), Edison will resubmit a response to Generic Letter 92-01 within 30 days after CE has released the relevant proprietary information to Edison on a non-proprietary basis.	SCE to NRC LTR 04/17/1995
1994-02-004	Edison will monitor the wide range pressurizer pressure transmitters on a refueling cycle interval. This is consistent with Bulletin 90-01, Supplement 1, Requested Actions, Operating Reactors I.a. Should this interval exceed 24 months, NRC concurrence will be obtained prior to exceeding the 24 month interval allowed by the bulletin.	SCE to NRC LTR 02/11/1994
1994-02-002	In order to provide a final resolution of this issue, prior to the completion of the Cycle 8 refueling outage, Edison will: 2) obtain motor specific performance data which will then be used as the basis for our GL 89-10 design basis calculations.	SCE to NRC LTR 02/11/1994
1994-02-001	In order to provide a final resolution of this issue, prior to the completion of the Cycle 8 refueling outage, Edison will: 1) Reanalyze DC MOVs using the Limitorque methodology, and/or,	SCE to NRC LTR 02/11/1994

Commitment Number	Verbatim Commitment to NRC	Commit Source
1993-09-003	For MOVs set and tested using the TMD during future refueling outages, a MOVATS ER 5.2 evaluation will be completed prior to returning the MOVs to service. In addition, by the end of the Unit 3 Cycle 8 refueling outage, SCE will complete documentation and validation of new information on MOV diagnostic equipment inaccuracy and evaluations to account for uncertainty in setting operating thrust to ensure operability for all MOVs in the San Onofre Units 2 and 3 GL 89-10 program.	SCE to NRC LTR 09/30/1993
1993-09-002	A TLU calculation will be performed to determine stem and yoke-mounted strain gage thrust measurement uncertainties.	SCE to NRC LTR 09/30/1993
1993-09-001	For uncertainties associated with other diagnostic systems, including thrust measurement using strain gages, SCE will ensure that the uncertainty of those systems will be less than the value for diagnostic system uncertainties used in the GL 89-10 setpoint calculation.	SCE to NRC LTR 09/30/1993
1993-03-003	Although SCE believes our enhanced surveillance program is adequate to detect a failed transmitter, we will complete an evaluation of our enhanced monitoring program to verify program adequacy during the preparation of the program procedure. When these actions have been completed , SCE will send the requested notification letter to the NRC.	SCE to NRC LTR 03/04/1993
1993-03-002	A separate procedure for the enhanced monitoring program will be issued by November 19, 1993.	SCE to NRC LTR 03/04/1993
1993-03-001	SCE will comply with the actions requested by the NRC for Rosemount Model 1153 Series B and D, and Model 1154 transmitters manufactured prior to July 11, 1989 except for the monitoring frequency of category 1b transmitters which may exceed the 24 month refueling cycle.	SCE to NRC LTR 03/04/1993

Commitment Number	Verbatim Commitment to NRC	Commit Source
1992-09-001	SONGS 1 will be permanently shut down approximately the end of November 1992 and the reactor subsequently defueled in March 1993. Following defueling, the four shutdown functions will no longer be required to achieve and maintain hot shutdown conditions. The spent fuel will be placed in the spent fuel pool for long term decay heat removal , which will be provided by the component cooling water system in conjunction with the salt water cooling system . These changes will take place within the 3 year interval allowed by GL-87-02 to submit the results of USI A-46 review.	SCE to NRC LTR 09/18/1992
1992-01-001	Full compliance will be achieved by September 30, 1992, when both the Units 2 and-3 ISI programs are formally issued.	SCE to NRC LTR 01/17/1992
1991-09-003	SCE will provide written confirmation of the completion of items (c) and (d) by November 15, 1991.	SCE to NRC LTR 09/30/1991
1991-09-002	The verification and validation of the computer program, in accordance with Quality Assurance requirements, associated with the process described in item (b) above will be completed by January 17, 1992.	SCE to NRC LTR 09/30/1991
1991-06-002	Full compliance, regarding parking lot 1, will be achieve by August 30, 1991, when the NCRs are dispositioned.	SCE to NRC LTR 06/25/1991
1991-06-001	Full compliance will be achieved at the next annual update of the UFSARS.	SCE to NRC LTR 06/10/1991
1991-01-001	For item 4, our Human Factors review of the CFMS displays has determined that use of cyan instead of white would provide a greater improvement in the CFMS level 1 display. This change will also be completed during the Unit 2, Cycle 6 refueling outage.	SCE to NRC LTR 01/31/1991
1990-12-004	While we plan to comply with the applicable items, we are confirming our compliance with each recommendation and will provide a detailed response when we submit the amendment application.	SCE to NRC LTR 12/27/1990

Commitment Number	Verbatim Commitment to NRC	Commit Source
1990-12-003	We will integrate the Technical Specification changes requested by GL 90-06 with that submittal.	SCE to NRC LTR 12/27/1990
1990-12-002	This TS change submittal will be made by the end of the Unit 2 Cycle 6 refueling outage scheduled for July to September 1991.	SCE to NRC LTR 12/21/1990
1990-12-001	As requested in GL 90-06, this TS change submittal will be made by the end of the Unit 2 Cycle 6 refueling outage scheduled for July to September 1991.	SCE to NRC LTR 12/21/1990
1990-08-008	We intend to provide the results from the loss of normal instrument air testing (3.2a), the review of the blowdown inspection program (1.2c), and the review of valve post-installation testing (3.2b) by November 30, 1990. The results from the air quality laboratory tests (1.2a) and the Instrument Air System flowrate measurements (3.2c) will be provided to you within six months of return to service from the Cycle 11 refueling outage. Finally, the resolution of the verification of an isolated incident of residual desiccant (1.2b) will be provided to you by the end of the Cycle 12 refueling outage.	SCE to NRC LTR 08/30/1990
1990-08-007	Based on this data an appropriate system flowrate will be determined and the FSAR will be updated as appropriate. We will provide you with the results within six months after return to service from the Cycle 11 refueling outage.	SCE to NRC LTR 08/30/1990
1990-08-006	A review of the post-installation test records will be conducted to verify that all testing meets current post-installation standards. We will provide you with the results of the review by November 30, 1990.	SCE to NRC LTR 08/30/1990
1990-08-005	The testing is scheduled for completion by November 1990. We will provide you with the final test results by November 30, 1990.	SCE to NRC LTR 08/30/1990
1990-08-004	In response to the generic letter, we will review our inspection program and provide the results of our review to you by November 30, 1990.	SCE to NRC LTR 08/30/1990

Commitment Number	Verbatim Commitment to NRC	Commit Source
1990-08-003	A follow-up Cycle 12 refueling outage inspection will be performed to confirm this conclusion. We will inform you of the results of the inspection at the end of the Cycle 12 refueling outage.	SCE to NRC LTR 08/30/1990
1990-08-002	In order to reconfirm our conclusion, we will perform laboratory tests of the air quality. To ensure that the air quality testing is performed during normal system operating loads and configuration, the air quality testing will be performed after startup from the Cycle 11 refueling outage. We will provide you with the results of the air quality tests within six months after return to service from the Cycle 11 refueling outage.	SCE to NRC LTR 08/30/1990
1990-08-001	SCE will submit the MCCB testing report for Unit 1 in accordance with the schedule restated above. Following submittal of the Unit 1 report, SCE will have satisfied all of the reporting requirements of NRC Bulletin 88-10.	SCE to NRC LTR 08/21/1990
1990-07-002	SCEs response to Generic Letter 90-04 will be completed by the NRC due date of September 23, 1990.	SCE to NRC LTR 07/03/1990
1990-07-001	As requested by Generic Letter 89-13, SCE will provide a single written confirmation to the NRC (within 30 days of completion) that the actions required by Generic Letter 89-13 have been completed for each Unit. Following submittal of this verification, all action for this item will be complete.	SCE to NRC LTR 01/26/1990
1990-03-007	Overfill and other transient uncertainties will be explicitly addressed within the IPE. Thus a more complete understanding of plant safety and appropriate plant specific modifications to improve overall plant safety can be obtained. SCE will submit the results of our IPE by September 1, 1992	SCE to NRC LTR 03/20/1990
1990-03-006	The consolidated NRC open item and commitment tracking program will be implemented by June 1, 1990. Review of NRC commitments and tracking program documentation will be completed by August 1, 1990.	SCE to NRC LTR 03/19/1990

Commitment Number	Verbatim Commitment to NRC	Commit Source
1990-03-005	For those licensees which elect not to implement the recommendations, an appropriate justification is required. SCE will provide a response by March 20, 1990. Therefore, USI A-47 is not resolved for SONGS 2 and 3.	SCE to NRC LTR 03/19/1990
1990-03-004	Emergency lighting modifications will be implemented if required as a result of SBO procedures.	SCE to NRC LTR 03/12/1990
1990-03-003	SCE will develop a severe weather response procedure in accordance with NUMARC 87-00.	SCE to NRC LTR 03/12/1990
1990-03-002	Consistent with SCEs Station Blackout analysis, SCE will modify plant procedures to require load group A to be connected to battery C and load group B to be connected to battery D during a Station Blackout event.	SCE to NRC LTR 03/12/1990
1990-03-001	The installation of cable and conduit between DC Buses A and C and DC Buses B and D will be implemented to comply with the SBO rule.	SCE to NRC LTR 03/12/1990
1989-11-005	These corrections will be submitted as an additional supplement to the original SCE response. SCE will submit the additional supplement by March 1, 1990. That supplement will provide a revised summary of nontraceable stored spares contained in Appendix A of the original SCE response. SCE expects the population of nontraceable MCCBS to be reduced.	SCE to NRC LTR 11/16/1989
1989-11-004	For station applications which require an obsolete model or instances of corrective maintenance in which SCE has not yet obtained traceable products, SCE will continue to maintain sufficient stored spares utilizing nontraceable MCCBs which have been satisfactory tested. However, contrary to the original SCE response, access to these MCCBs will be controlled and limited to serve short term measures. For each occurrence of use, the MCCB will be evaluated for operability and resolved for the long term per Station NCR Procedure S0123-XV-5. SCE will ensure that all reasonable courses of action are evaluated before proceeding with the use of a nontraceable MCCB.	SCE to NRC LTR 11/16/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-11-003	In compliance with the NRC position, SCE will retain nontraceable MCCBs in quarantine.	SCE to NRC LTR 11/16/1989
1989-11-002	Acceptability will include MCCBs in which SCE had previously been unable to establish traceability by QA audit of verifiable documentation. Additional traceability investigations as performed by SCE QA audit will not be required. SCE will document acceptability in accordance with Station NRC Procedure S0123-XV-5 and report its findings as a supplement to the original SCE response.	SCE to NRC LTR 11/16/1989
1989-11-001	Based on the clarification offered by this NRC position for MCCBs received prior to August, 1983, SCE will designate each MCCB which is traceable to an original construction order as acceptable.	SCE to NRC LTR 11/16/1989
1989-10-004	SCE will be installing isolation valves and test connections in the instrument air backup nitrogen system to allow testing of the backup nitrogen system isolation check valves during the Cycle 5 refueling outages for Units 2 and 3 (Unit 2 is currently in its Cycle 5 refueling outage; Unit 3 is scheduled to begin its Cycle 5 refueling outage in April 1989). Consistent with the requirements of Generic Letter 88-14, SCE will submit notification to the NRC when these modifications have been completed.	SCE to NRC LTR 10/30/1989
1989-09-001	In response to Bulletin Action Request 5, SCE will be replacing or testing all installed CBs that cannot be traced to the Circuit Breaker Manufacturer before startup from the first refueling outage beginning after March 1, 1989. In response to Reporting Requirement 2 which requests submittal of these Action 5 test results, SCE will provide separate reports for Units 1, 2 and 3. Thereport for San Onofre Unit 1 will be submitted 30 days after startup following the Cycle 11 outage. For Units 2 and 3, the reports will be submitted within 30 days after their Cycle 5 outages.	SCE to NRC LTR 09/06/1989
1989-07-001	SCE will reduce the occurrence of out of range data by January 1, 1992. Additionally, as required by Generic Letter 89-06, SCE will retain the completed checklist and photographs for CFMS for at least three years.	SCE to NRC LTR 07/14/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-06-006	SCE commits to comply with the Actions Requested Item 2 of Reference 1, but reserves the right to propose alternative actions with supporting justification prior to the next San Onofre Unit 1 refueling outage.	SCE to NRC LTR 06/19/1989
1989-04-005	Minor changes will be made as necessary to ensure operation of this system under the conditions of a station blackout event.	SCE to NRC LTR 04/17/1989
1989-04-004	Minor procedure changes will be implemented in the SBO response procedure to ensure all of the Provisions of NUMARC 87-00, Section 7 are included.	SCE to NRC LTR 04/17/1989
1989-04-003	San Onofre Unit 1 currently has an SBo response procedure, SOI-1.0-60. This procedure will be reviewed and modified as necessary to satisfy the requirements of NUMARC 87-00, Section 4.2.1.	SCE to NRC LTR 04/17/1989
1989-04-002	SCE will develop a severe weather response procedure in accordance with NUMARC 87-00, Section 4.2.3.	SCE to NRC LTR 04/17/1989
1989-04-001	In the event that San Onofre Unit 1 becomes blacked out, actions necessary to restore power to the switchyard would be fulfilled by Unit 2/3 operators. This procedure will be reviewed and modified as necessary to meet NUMARC 87-00, Section 4.2.2.	SCE to NRC LTR 04/17/1989
1989-03-006	Consistent with Reporting Requirement 2 of Bulletin 88-10, SCE will submit a report that summarizes the results of tests conducted in accordance with Action Requests 3 and 5 within 30 days after start-up from the Unit 1 Cycle 11, Unit 2 Cycle 5 and Unit 3 Cycle 5 refueling outages.	SCE to NRC LTR 03/30/1989
1989-03-003	as required by NRC Bulletin 88-11 Reporting Requirement 3, SCE will provide the NRC with the results of the plant specific analysis required by NRC Bulletin 88-11 Action Item 1.d by February 4, 1991.	SCE to NRC LTR 03/08/1989
1989-03-002	Actual plant data will be used to define loading conditions for input to the fatigue and stress evaluations consistent with Requested Action 1.d of NRC Bulletin 88-11.	SCE to NRC LTR 03/08/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-03-001	The CEOG will perform a preliminary bounding evaluation of CEOG surge lines using actual data collected from CEOG plants by July 1, 1989. This activity will address the intent of Requested Action 1.b. After July 1, 1989, this preliminary bounding evaluation will be available to CEOG member utilities.	SCE to NRC LTR 03/08/1989
1989-02-011	Based on this evaluation, it has been concluded that the use of permanent tags which uniquely distinguish the first isolation valve off the RCS/SDCS will be installed. The existence of these tags will be incorporated into plant operating procedures and the significance of these tags and values will be taught to Maintenance and other support personnel prior to entering a Reduced Inventory Condition.	SCE to NRC LTR 02/21/1989
1989-02-009	As discussed in our response to item 2.5 of the expeditious actions, prior to entering an RCS Reduced Inventory Condition, RCS perturbation control will be implemented. An initial RCS Perturbation List will be established by reviewing "in progress" surveillance, procedures, and Work Authorizations to determine their potential threat to the RCS stability. In addition, management approval will be required for all Work Authorizations which may impact reduced inventory or mid-loop operation. SCE policy is to delay such activities (whenever possible) until the RCS is not in a Reduced Inventory Condition. However, when such activities are identified and cannot be delayed, then extra measures will be taken as appropriate to the degree of threat. These measures will include actions to mitigate the loss of Reactor Core Cooling and/or enhanced monitoring of critical parameters.	SCE to NRC LTR 02/21/1989
1989-02-008	The Combustion Engineering Owners Group (CEOG) is investigating the impact of the generic letter with respect to Technical Specification requirements. Based on preliminary results of their work to date, certain areas have been identified as potentially being affected by the actions identified by the generic letter. ... SCE will follow this effort closely and will submit changes to technical specifications where warranted to achieve the desired relaxation.	SCE to NRC LTR 02/21/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-02-007	<p>Areas which SCE intends to analyze are the following: i) Determination of hot leg vent path size versus number of days elapsed since plant shutdown. ii) Determination of required makeup water flow requirements versus number of days elapsed since plant shutdown. iii) Determination of loss of DHR RCS heatup rate. iv) Determination of loss of DHR containment pressurization rate v) Confirm adequacy of the fuel transfer tube water seal to maintain containment integrity vi) Determination of minimum DHR flow requirements vii) Analysis of removal of high pressure closure contacts to the DHR suction valves viii) Analysis to develop a basis for RCS level instrumentation installation and response (i.e., RCS level gradient correlation. These planned analyses will be completed in sufficient time to permit any procedural enhancements and plant modifications required by the analyses to be completed by April 30, 1990 and the end of the Cycle 6 refueling outage, respectively.</p>	SCE to NRC LTR 02/21/1989
1989-02-006	The Loss of Shutdown Cooling procedure will provide guidance to ensure makeup flow does not bypass the Reactor Core.	SCE to NRC LTR 02/21/1989
1989-02-005	<p>Adequate operating, operable and/or available equipment of high reliability is provided for cooling the RCS and for avoiding a loss of RCS cooling. Prior to entering an RCS Reduced Inventory Condition, two means of adding inventory to the RCS will be required. This will be accomplished by having one High Pressure Safety Injection Pump operable and either a Containment Spray Pump, second High Pressure Safety Injection Pump, or Charging Pump available. In order to prevent Reactor Core uncover, use of a Charging Pump will be time dependent after shutdown because of its lower flowrate. Use of a Containment Spray Pump will require that an operator be dispatched to the Pump for valve manipulation.</p>	SCE to NRC LTR 02/21/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-02-004	<p>SCE has developed and implemented procedures which describe activities conducted during RCS dndown modes and operation with the RCS partially filled. A summary listing of those procedures is presented below: SO23-5-1.5, Plant Shutdown form Hot Standby to Cold Shutdown SO23-3-2.6, Shutdown Cooling System Operation SO23-3-1.8, Dning the Reactor Coolant System SO23-5-1.8, Shutdown Operations (Modes 5 and 6) SO23-3-2.8.1, Refueling Cavity Dning Operations SO23-5-1.3, Plant Startup from Cold Shutdown to Hot Standby SO23-3-1.4, Filling and venting the Reactor Coolant System AOI SO23-13-15, Loss of Shutdown Cooling In addition, a number of planned actions to address the expeditious actions of the generic letter issues, will be incorporated into the RCS ddn procedure prior to initial dning of the RCS to a reduced inventory condition as specified in our response to the expeditious actions.</p>	SCE to NRC LTR 02/21/1989
1989-02-003	Annunciation, both audible and visual will be provided for the following abnormal conditions: i) RCS low level ii) RCS high temperature iii) DHR low flow iv) Low DHR motor amperes	SCE to NRC LTR 02/21/1989
1989-02-002	Two independent temperature indications of reactor core exit conditions will be in operation prior to entering an RCS mid-loop condition whenever the Reactor Vessel (RV) head is located on top of the RV.	SCE to NRC LTR 02/21/1989
1989-02-001	Two independent, continuous, full range RCS water level indications with low level alarm capability will be provided in the control room. Both indications will be in service in the control room whenever the RCS is in a reduced inventory condition.	SCE to NRC LTR 02/21/1989
1989-01-015	The Loss of Shutdown Cooling procedure will provide guidance to ensure makeup flow does not bypass the Reactor Core.	SCE to NRC LTR 01/05/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-01-014	Prior to entering an RCS Reduced Inventory Condition, two means of adding inventory to the RCS will be required. This will be accomplished by having one HPSI Pump operable and either a Containment Spray Pump or Charging Pump available. In order to prevent Reactor Core uncover, use of a Charging Pump will be time dependent after shutdown because of its lower flowrate. Use of a Containment Spray Pump will require that an Operator be dispatched to the pump for valve manipulation.	SCE to NRC LTR 01/05/1989
1989-01-013	Programmed Enhancements will include an evaluation to determine if it would be beneficial to tag the first isolation valve off the RCS/RHRS which could potentially dn the RCS to state that misoperation of this valve may result in a loss of RCS inventory.	SCE to NRC LTR 01/05/1989
1989-01-012	The RCS Perturbation List will be maintained current by reviewing daily revisions to the Work Authorization Letter and all other activities within the cognizance of the operating shift. Those activities which cannot be delayed will be included on the list as previously described.	SCE to NRC LTR 01/05/1989
1989-01-011	Prior to entering an RCS Reduced Inventory Condition, RCS Perturbation control will be implemented. An initial RCS Perturbation List is established by reviewing "in progress" surveillances, Procedures, and Work Authorizations to determine their potential threat to RCS stability. Additionally, management approval will be required for all Work Authorizations which may impact reduced inventory or mid loop operation. SCE policy is to delay such activities (whenever possible) until the RCS is not in a Reduced Inventory Condition. However, when such activities are identified and cannot be delayed, then extra measures will be taken as appropriate to the degree of threat. These measures will include actions to mitigate the loss of Reactor Core cooling and/or enhanced monitoring of criti parameters.	SCE to NRC LTR 01/05/1989
1989-01-010	Programmed Enhancements will include an evaluation for providing a second continuous indication of RCS water level.	SCE to NRC LTR 01/05/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-01-009	While in the mid loop condition, with HJTC No. 6 uncovered or inoperative, LPSI pump amperage will be monitored and recorded hourly in the control room, until such Instrumentation has been provided with alarm capability.	SCE to NRC LTR 01/05/1989
1989-01-008	Prior to entering a Reactor Coolant System Midloop Condition, two independent continuous temperature indications of Reactor Core exit conditions will be in operation. The selected indications will be the water covered unheated thermocouples of the Heated Junction Thermocouple (HJTC) System or the Core Exit Thermocouples addressed on the plant Qualified Safety Parameter Display System (QSPDS) Computer in the Control Room. For reliability, the selected indications will be energized from separate power supplies. When Reactor Head disassembly or reassembly is in progress, temporary cables will be provided to the selected thermocouples. The available temperature indications will be monitored and recorded hourly in the control room, until such instrumentation has been provided with alarm capability.	SCE to NRC LTR 01/05/1989
1989-01-007	In addition, the Maintenance Department will signoff that the planned Containment Closure methods conform to the definition of a Closed Containment. Material such as wood and plastic sheeting will be specifically excluded from use as closure methods, unless specifically allowed by an engineering evaluation that considers the potential effects of containment internal pressurization and combustion.	SCE to NRC LTR 01/05/1989
1989-01-006	Cold Leg valve openings will meet the same requirements as maintenance openings, or will be administratively controlled when such openings are greater than one square inch. Operation of the RCS Educator System (to decrease activity and hydrogen levels) requires the opening of Cold Leg vent valves with an aggregate area of two to three square inches. If the evolution must be performed when the containment is not closed and a valid hot leg vent does not exist, then an operation will be continuously stationed inside the containment to close these valves within 20 minute notice.	SCE to NRC LTR 01/05/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-01-005	Valid hot leg vents include the pressurizer manway and the steam generator hot leg manway provided these vent paths are unobstructed. Other hot leg vents will be excluded, unless specifically allowed by an engineering evaluation that considers decay heat and hot leg pressurization. To avoid entering the 45 minutes requirement, procedures will have the option of administratively limiting RCS Cold Leg vent size to less than one square inch until a Hot Leg vent is established.	SCE to NRC LTR 01/05/1989
1989-01-004	Prior to entering an RCS Reduced Inventory Condition, Containment Closure control will be implemented as stated in the Existing Actions, but with new requirements. With cold leg openings of one square inch or less, Containment Closure will be required within 45 minutes of notice, unless a valid hot leg vent path has been established. If a valid hot leg vent path has been established, then with a cold leg opening of greater than one inch, containment closure will be required within 2 hours of initiation.	SCE to NRC LTR 01/05/1989
1989-01-003	Prior to entering an RCS Reduced Inventory Condition,[see NRCT 1989-01-003] ...In addition, selected Maintenance personnel, and other support personnel when applicable, will be trained in the requirements and methods of Containment Closure. The frequency of this training will be the same as that for plant Operators.	SCE to NRC LTR 01/05/1989
1989-01-001	The existing actions are incorporated in the reactor coolant system (RCS) dn procedure and the planned actions will be incorporated prior to initial dning of the RCS to a reduced inventory condition. SCEs response to the programmed enhancements will be submitted under separate cover by February 1, 1989.	SCE to NRC LTR 01/05/1989
1988-10-002	Based on the review, the welds, heat-affected zones and high stress locations, including geometric discontinuities, of the piping section which will not be removed from the plant will be examined non-destructively as requested in Action 2 of the Bulletin to provide assurance that there are no existing flaws. These examinations will be completed before the end of the Cycle 5 refueling outage for each of Units 2 and 3.	SCE to NRC LTR 10/19/1988

Commitment Number	Verbatim Commitment to NRC	Commit Source
1988-10-001	At the Cycle 5 refueling, as requested in Action 3 of the Bulletin, a modification will be planned and implemented to assure that the pressurizer auxiliary spray/pressurizer spray line will not be subjected to combined cyclic and static thermal and other stresses that could cause fatigue failure the remaining operating life of Units 2 and 3.	SCE to NRC LTR 10/19/1988
1988-07-002	It is anticipated that a schedule for completion of the CEOG effort will be available within 60 days. Therefore, SCE will provide NRC with a schedule for our final response to the subject bulletin in approximately 60 days.	SCE to NRC LTR 07/26/1988
1988-05-004	Use of the existing NCR program will require that all boric acid leakage be adequately evaluated which may include a formal Root Cause Evaluation, and that the identified corrective actions be implemented which could include design changes to minimize sources of leakage and the use of corrosion resistant materials, as necessary.	SCE to NRC LTR 05/31/1988
1988-05-003	Revisions to Station Technical procedures and to the NCR procedure will result in all identified boric acid leaks being subject to the NCR program. The NCR procedure provides for thorough investigation of identified deficiencies, evaluation of their effects and identification of corrective actions. This change will add more formality and an engineering review to the existing process and ensure appropriate priority in the evaluation and elimination of the boric acid leaks. By July 1, 1988 program revisions will ensure that any boric acid leakage discovered will be evaluated and dispositioned using NCR's.	SCE to NRC LTR 05/31/1988
1988-05-002	These visual inspections have proven to be effective in identifying boric acid leakage. Procedure revisions will be written to formalize the existing inspection points. Procedures will identify specific areas to be visually inspected, and where necessary, provide detailed guidance regarding obscure locations within an area . Procedure revisions will be in place by September 1988, in time for the next refueling outage for each unit.	SCE to NRC LTR 05/31/1988

Commitment Number	Verbatim Commitment to NRC	Commit Source
1988-05-001	As identified in the enclosure, SCE relies heavily on existing practices to address boric acid leakage. By July 1, 1988 a revision will be made to the Nonconformance Report (NCR) program to address boric acid leakage. This revision will ensure that any boric acid leakage discovered will be documented and dispositioned using the NRC program. Additionally, by September 1988, the Station Technical organization will implement a procedure which will formalize and integrate practices related to boric acid leakage control.	SCE to NRC LTR 05/31/1988
1988-04-001	SCE will formalize and implement an enhanced primary-to-secondary leak rate monitoring program upon return to service from the present mid-cycle outage (tentatively scheduled for April 29, 1988). The enhanced monitoring program will meet the criteria for being able to monitor a tube failure with leakage characteristics similar to that which occurred at North Anna and take appropriate actions prior to rupture of the tube. The following provides details of the San Onofre Unit 1 enhanced monitoring program.	SCE to NRC LTR 04/06/1988
1986-07-001	A search of this COPE listing is made for all quality affecting, including safety related, equipment purchase orders. If these switches should be determined to on a purchase order, the purchase order will be rejected or specific control will be implemented to assure the switch would only be used in the present application.	SCE to NRC LTR 07/28/1986
1986-03-003	SCE commits to inclusion of breaker response time for undervoltage trip into a periodic trending program. Breaker response time for undervoltage trip will be trended on a monthly interval by SCE NSSS Electrical Engineering. The response time plot will be used in adjusting the maintenance interval. By the letter dated May 2, 1983, from D. G. Eisenhut to R. Dietch and G. D. Cotton, this maintenance interval cannot exceed 6 months.	SCE to NRC LTR 03/25/1986
1986-03-002	If degradation in bearing performance is detected, insomuch as effecting breaker performance, the bearings will be replaced.	SCE to NRC LTR 03/25/1986

Commitment Number	Verbatim Commitment to NRC	Commit Source
1986-03-001	Replacement of the remaining HFA relay in the Unit 2 Auxiliary Building Emergency Chiller will be completed during the current Unit 2 refueling outage.	SCE to NRC LTR 03/17/1986
1985-12-001	The NRC staff has expressed some concern over the magnitude of the predicted fuel failures. In response, the event will be reanalyzed taking credit for a Variable Overpower Trip (VOPT) from the CPCS.	SCE to NRC LTR 12/05/1985
1985-10-032	The results of the analysis of the increase in feedwater flow event indicate that 10 minutes is not available for operator action to terminate the event. Corrective measures will be identified by January 31, 1986 and any modifications will be scheduled in accordance with the Integrated Living Schedule.	SCE to NRC LTR 10/04/1985
1985-10-031	SCE will install modifications during the upcoming outage to assure the capability of shutting down in the event of a fire.	SCE to NRC LTR 10/04/1985
1985-10-030	Details of the temperature monitoring program will be submitted by December 16, 1985.	SCE to NRC LTR 10/04/1985
1985-10-029	A reliability evaluation of the SWC System will be performed by May 1, 1986.	SCE to NRC LTR 10/04/1985
1985-10-028	SCE agrees that the Independence of these valves will be verified as part of the VI-7.C.2 analysis. This will be complete by May 1, 1986.	SCE to NRC LTR 10/04/1985
1985-10-027	A third tn of auxiliary feedwater will be partially installed during the upcoming outage as part of the Appendix R backfits. The system will not be automatic and fully safety related until additional modifications are performed during the refueling backfit outage for Cycle 10. This modification-has been scheduled in accordance with the ILS.	SCE to NRC LTR 10/04/1985
1985-10-026	The suggested Technical Specifications will be submitted by January 31, 1986.	SCE to NRC LTR 10/04/1985
1985-10-025	Each of the remaining issues will be evaluated for safety significance. The evaluation will be completed by May 1, 1986.	SCE to NRC LTR 10/04/1985

Commitment Number	Verbatim Commitment to NRC	Commit Source
1985-10-024	An automatic trip feature will be added to the Safety Injection System to terminate primary injection on low Refueling Water Storage Tank level. The details of the modification have not been determined at this time but will be developed as part of preliminary engineering. This modification will be scheduled in the next Integrated Living Schedule (ILS) update in accordance with the ILS Plan.	SCE to NRC LTR 10/04/1985
1985-10-023	An evaluation of when to close the valves on the refueling water return line will be complete by May 1, 1986.	SCE to NRC LTR 10/04/1985
1985-10-021	The provisions to isolate the CCW System lines penetrating containment either immediately or long after an accident will be evaluated. This evaluation will take into account post accident radiation levels and accessibility. This review and changes or additions to any procedures will be implemented by May 1, 1986.	SCE to NRC LTR 10/04/1985
1985-10-019	These lines are included in the seismic reevaluation program. Any identified modifications will be implemented during the upcoming outage.	SCE to NRC LTR 10/04/1985
1985-10-018	As stated in our January 19, 1984 letter, the necessary procedures will be in-place prior to return-to-service from the upcoming refueling outage.	SCE to NRC LTR 10/04/1985
1985-10-017	The inspection program to be performed coincides with type A testing and will consist of a visual inspection similar to that performed during the 1982 outage.	SCE to NRC LTR 10/04/1985
1985-10-016	The proposed OMS Technical Specifications will be revised to require the OMS to be in operation when necessary to protect the integrity of the RHR system from overpressure transients. These revised Technical Specifications will be submitted by January 31, 1986.	SCE to NRC LTR 10/04/1985
1985-10-015	SCE will review the seismic capabilities of the leakage detection systems to determine which if any should be relied upon immediately following a seismic event. If seismic capability cannot be demonstrated, alternate means of detecting leakage immediately following a seismic event will be investigated. The results of this review will be provided by November 30, 1985.	SCE to NRC LTR 10/04/1985

Commitment Number	Verbatim Commitment to NRC	Commit Source
1985-10-014	Proposed Technical Specifications will be submitted by January 31, 1986.	SCE to NRC LTR 10/04/1985
1985-10-013	The need for greater sensitivities of the SONGS 1 leakage detection system will be determined by Topic III-5.A.	SCE to NRC LTR 10/04/1985
1985-10-012	The load combinations remaining to be reviewed involve other SEP open issues. In each of these Issues the effects of the appropriate load combinations will be evaluated. The following load combinations are indicated in NRC letter September 21, 1982 as those necessary under the SEP to demonstrate that structural integrity is maintained. The terms are defined in the above letter.	SCE to NRC LTR 10/04/1985
1985-10-011	The analyses and modifications necessary to complete the Seismic Reevaluation program at San Onofre Unit I will be complete by return-to-service from the refueling/backfit outage scheduled to begin on November 30, 1985.	SCE to NRC LTR 10/04/1985
1985-10-010	SCE will perform an analysis similar to that for Topic III-5.A above. The revised analysis will be complete by August 31, 1986.	SCE to NRC LTR 10/04/1985
1985-10-009	SCE will perform a revised analysis of the effects of high energy line breaks inside containment. The analysis will take into consideration recent information and modifications implemented as part of the seismic reevaluation program and Appendix R Program. It will also consider the effects of breaks on cables. The analysis will be complete by August 31, 1986. As leak-before-break methods are expected to be used in resolving the interaction, any required changes in SONGS 1 leakage detection capabilities will also be determined.	SCE to NRC LTR 10/04/1985
1985-10-008	SCEs ongoing evaluation to resolve section 4.5. Topic III-2, Wind and Tornado Loadings, is considering the effects of tornado missiles. The results of that analysis will be provided by January 6, 1986.	SCE to NRC LTR 10/04/1985
1985-10-007	Details of the intake structure surveillance program will be submitted by October 4, 1984. The seawall will be inspected during the refueling/backfit outage scheduled to start on November 30, 1985.	SCE to NRC LTR 10/04/1985
1985-10-006	The program will be revised to incorporate the above comments prior to the next scheduled inspection.	SCE to NRC LTR 10/04/1985

Commitment Number	Verbatim Commitment to NRC	Commit Source
1985-10-004	It should be noted that the analysis does include an evaluation of the effects of tornado missiles and is not limited to windspeed effects. The project is ongoing and is now expected to be complete by January 6, 1986. The results of SCE's study will be provided at that time.	SCE to NRC LTR 10/04/1985
1985-10-003	The results of the evaluations will be incorporated into the Final Safety Analysis update required by 10 CFR 50.71. If any modifications or changes to the Inspection program at SONGS 1 are deemed necessary due to these evaluations, they will be separately reported to the NRC staff.	SCE to NRC LTR 10/04/1985
1985-10-002	SCE agrees with the NRC staff's proposed resolution of the remaining open issues and will perform the evaluations of section 4.4 of NUREG-0829, or if it is determined that such evaluations are not possible due to missing information or that it is not practical to do such evaluations, the safety significance of the component or system in question will be evaluated.	SCE to NRC LTR 10/04/1985
1985-10-001	The dates herein specified for major evaluations will be included in the next revision of the San Onofre Unit 1 Integrated Living Schedule.	SCE to NRC LTR 10/04/1985
1985-05-001	During this review, should the Maintenance Supervisory personnel identify any parameter outside its acceptance criteria, further investigation and corrective action will be initiated. Information derived from the analysis is used as a basis for purchasing spare parts and replacing components that show sign of degradation. Accordingly, the technical criteria to be used for evaluating trend data, the frequency of trend data analyses, and effect of its results on periodic maintenance will be consistent with Westinghouse Owners Group recommendations where appropriate.	SCE to NRC LTR 05/14/1985
1985-03-003	A Site Order detailing the COPE Program was issued on February 27, 1985. This program will be fully implemented by June 1, 1985.	SCE to NRC LTR 03/29/1985

Commitment Number	Verbatim Commitment to NRC	Commit Source
1985-03-002	A Nonconformance Report was issued for these relays and they will remain quarantined until conversion kits are received to replace the defective coils and related parts.' To prevent disqualified parts from being procured or stocked at the SONGS warehouse, additional administrative controls (as described below) are being developed and will be integrated with the existing controls to assure compliance with Action Item No. 4.	SCE to NRC LTR 03/29/1985
1985-03-001	Of the total of 12 1E HFA series 51/54 relays still in use in Units 2 and 3, none show signs of deterioration. All of these relays are included in a monthly visual surveillance to assure continued operability, and will be replaced with Century Series relays before March 12, 1986.	SCE to NRC LTR 03/29/1985
1984-10-003	Accordingly, SCE will install the independent, redundant pressurization systems for each pneumatic seal prior to use of each seal as a fluid restraining boundary to ensure water shielding over spent fuel. These permanent, redundant pressurization systems, described in the Enclosure 1, are similar to a temporary system which was used when the refueling cavity was flooded during the plant start-up testing.	SCE to NRC LTR 10/26/1984
1984-10-002	A design change will be made to the Diesel's starting and running circuitry to allow idle starting of the Diesels. This will allow the Diesels to be brought up to, and held at an idle to allow warmup and full lubrication of the Diesels prior to bringing them up to their full speed of 900 rpm. Once installed, the idle start will be used for all surveillance and post maintenance starts not specifically requiring a cold fast start. In addition, the Diesel Generators will be idled for cooldown prior to Diesel Generator Shutdown. The schedule for implementation of this proposed design change is currently under evaluation.	SCE to NRC LTR 10/01/1984

Commitment Number	Verbatim Commitment to NRC	Commit Source
1984-10-001	As recommended by NRC Generic Letter 84-15, a Technical Specification change is currently in the final stages of preparation and will be submitted in the near future. The change will reduce the frequency of cold fast start surveillances from every 31 days to every 184 days as required per Section 4.8.1.1.2a4 and 4.8.1.1.2a5. This will greatly reduce the number of cold fast starts required to satisfy existing Technical Specification required surveillances.	SCE to NRC LTR 10/01/1984
1984-07-002	In addition, these controls will ensure that the older and problematic HFA relay coils are not inadvertently used as a replacement part in safety-related applications in future maintenance efforts.	SCE to NRC LTR 07/30/1984
1984-07-001	Any relays which are not replaced before the Unit 1 return to service will be included in a monthly visual surveillance to assure their continued operability and will be replaced well before March 12, 1986 as required by this bulletin. If signs of deterioration are found (visible cracks or melting), the relay will be replaced on a high priority basis. If the degree of deterioration is significant (e.g., severe spool cracking) an engineering evaluation will be performed to assess the impact of relay failure in order to justify continued operation. Relays will be cleaned in accordance with approved procedures if necessary.	SCE to NRC LTR 07/30/1984
1984-05-004	The recommended enhancements to NPRDS and SEE-IN will be incorporated and revisions included as appropriate by January 1, 1986.	SCE to NRC LTR 05/31/1984
1984-05-003	Enhancements to the SEE-IN program recommended by NUTAC will be incorporated. Revisions to existing administrative programs or procedures or to training or other activities will ensure data reported to the SEE-IN program is complete and detailed enough to support the system enhancements being undertaken by INPO.	SCE to NRC LTR 05/31/1984
1984-05-002	Enhancements to the NPROS recommended by NUTAC will be incorporated. Revisions to existing administrative programs or procedures and training will be accomplished to ensure a meaningful and effective implementation of the NPROS program enhancements.	SCE to NRC LTR 05/31/1984

Commitment Number	Verbatim Commitment to NRC	Commit Source
1984-05-001	Review of existing internal programs and procedures, to ensure support of the NUTAC. will be complete prior to January 1, 1985.	SCE to NRC LTR 05/31/1984
1984-04-014	Long-term corrective actions will be developed depending on the results of the preceding analysis. If potentially susceptible tubes are identified, a variety of corrective actions (e.g., preventive plugging/stabilization of potentially susceptible tubes, hardware and/or operational changes to reduce stability ratios, etc.) and/or long-term compensatory measures (e.g., enhanced leak rate monitoring programs) will be considered and to the extent practical will be implemented during the Cycle 10 refueling outage scheduled to start in July 1988.	SCE to NRC LTR 04/06/1988
1984-04-013	A stress ratio criteria will be developed based on the upper bound stress amplitude that could have been responsible for the failure of the tube which ruptured at North Anna. The AVB position information, the flow peaking factors, the results of the tube vibration analysis and the impact of past operation will be combined to determine which, if any San Onofre Unit 1 steam generator tubes exceed this stress ratio criteria.	SCE to NRC LTR 04/06/1988
1984-04-012	A dynamic analysis of the tubes in the regions of interest will be performed using the FLOVIB computer code based on the results of the thermal hydraulic analysis. The vibration analysis will determine tube stiffness, frequency and fluidelastic stability ratios for these tubes.	SCE to NRC LTR 04/06/1988
1984-04-011	Wind tunnel tests will be performed to determine the effects on fluidelastic instability of columnwise variations in AVB insertion depths. The criti velocities for fluidelastic instability will be obtained to determine the effects of AVB stagger on the instability. Peaking factors obtained will be expressed as a ratio of criti velocities among various AVB configurations, including the tube which ruptured at North Anna.	SCE to NRC LTR 04/06/1988

Commitment Number	Verbatim Commitment to NRC	Commit Source
1984-04-010	ATHOS, a three dimensional flow analysis code, will be used to calculate flow conditions in the regions of interest. A model will be set up with geometric parameters specific to San Onofre Unit 1. Detailed velocities, densities and void fractions for current operating conditions will be calculated.	SCE to NRC LTR 04/06/1988
1984-04-009	Eddy current testing (ECT) data has been obtained on all tubes in service in rows 11 through 17 in all three steam generators. (The nominal antivibration bar [AVB] position is row 14.) The ECT data will be analyzed to identify all of the tubes in this region of interest that are dented. The ECT data will also be evaluated to determine the number of AVB's in contact with each tube and the position of the contact points/arcs relative to the uppermost tube support plate. This AVB contact information will be used to determine the position of each AVB relative to the tubes it supports (the depth of penetration of each AVB). This effort will include consistency checks and independent verification of AVB position through geometric scaling techniques as required.	SCE to NRC LTR 04/06/1988
1984-04-008	Training on the basis for the San Onofre Unit 1 enhanced primary-to-secondary leak rate monitoring program will be conducted for all on-shift licensed reactor operators prior to return to full power operation from the current mid-cycle outage. In addition, Chemistry personnel will be trained on the methods utilized in the San Onofre Unit 1 enhanced monitoring program prior to return to full power from the current mid-cycle outage. Additional operator training on the North Anna Tube Rupture event is targeted for implementation the last half of 1988.	SCE to NRC LTR 04/06/1988

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1984-04-007	<p>If the air ejector monitor is out-of-service, several methods will be utilized to ensure that primary-to-secondary leak rates continue to be monitored. These methods will include, but are not limited to, daily secondary coolant and air ejector off gas activity analyses, and review of trending data utilizing R-1216, Steam Generator Blowdown Monitor. The first gas samples collected will be evaluated within 8 hours of when the air ejector monitor is declared out-of-service. Thereafter, samples will be collected daily when leak rates are less than 40 gpd and shiftily when leak rates are greater than 40 gpd. The importance of monitoring primary-to-secondary leak rates while the air ejector monitor is out-of-service is recognized and it is intended to continue trending and review of other pertinent data to ensure any changes in leak rate are promptly evaluated.</p>	SCE to NRC LTR 04/06/1988
1984-04-006	<p>If the leak rate approaches 100 gpd, an evaluation of the need to reduce power or commence shutdown will be performed. This evaluation will consider the leak rate data to date, the rate of change of the leak rate, and the leak rate measurement uncertainty. This evaluation will provide adequate time to reduce power or shutdown should a tube fatigue failure be in progress. Implementation of this program will be more conservative than would be required by the leak rate-time curve generated from the North Anna event.</p>	SCE to NRC LTR 04/06/1988
1984-04-005	<p>If evaluation shows that the primary-to-secondary leak rate is greater than 40 gpd or the leak rate has increased more than 15 within 24 hours and continues to increase, the frequency of evaluation of the leak rate will be increased to at least once per shift. The evaluation will consider the possibility that a tube plug or sleeve may have caused the increased leak rate. Unlike the continuous increasing leak rate that occurred at North Anna, the leak rate from a defective plug or sleeve should stabilize and may even decrease. The alarm setpoint for the air ejector monitor will be increased to a value which corresponds to approximately a 15 gpd increase over the latest leak rate.</p>	SCE to NRC LTR 04/06/1988

Commitment Number	Verbatim Commitment to NRC	Commit Source
1984-04-004	If an alarm is received from the air ejector monitor or calculations of primary-to-secondary leak rate show that the leak rate is increasing, confirmation of the change will be obtained by other methods. These will include, but are not limited to, reviewing the trends of the continuous blowdown monitor, or performance of radiochemistry analyses to allow independent calculations of the primary-to-secondary leak rate.	SCE to NRC LTR 04/06/1988
1984-04-003	During full power operation and with primary-to-secondary leak rates less than 15 gpd, the San Onofre Unit 1 leak rate monitoring program will consist of the following multi-faceted approach: 1) continuous monitoring utilizing R-1215 and R-1216, 2) radiochemistry analyses, 3) leak rate calculations, and 4) trending of data. The activity indications from the continuous monitors will be trended and reviewed once-a-day. The air ejector off gas flow rate will be logged and reviewed each day to assess changes in condenser air leakage. Primary-to-secondary leak rates will be calculated daily as a function of the air ejector activity readings, air ejector flow rate, and the most recent primary coolant gaseous activity. The primary coolant total gaseous activity is normally measured three times per week for use in determining primary-to-secondary leak rate.	SCE to NRC LTR 04/06/1988
1984-04-002	The initial alarm setpoint for the air ejector monitor (R-1215) will be established prior to returning the unit to critiity. This alarm setpoint will correspond to the activity expected from a primary-to-secondary leak rate of 15 gallons per day (gpd).	SCE to NRC LTR 04/06/1988
1983-03-005	Additional information concerning our preventive maintenance program will be submitted separately. As discussed in Reference 2, neither Unit will enter Mode 2 until advised by your office that the matter involving the reactor trip breakers is resolved.	SCE to NRC LTR 03/30/1983
1983-03-004	These deficiencies will be corrected by the preparation of a new procedure which incorporates the provisions of IE Bulletin 79-09, the vendor manual, and other inputs from the vendor. Maintenance in accordance with this new procedure will be performed on all Units 2 and 3 reactor trip circuit breakers prior to their respective Model 2 entry.	SCE to NRC LTR 03/30/1983

Commitment Number	Verbatim Commitment to NRC	Commit Source
1983-03-002	Before San Onofre Unit 1 is permitted to leave Mode 5, the deficiencies of the Type DB circuit breaker maintenance procedure will be corrected, the maintenance required by Action Item No. 2 of IE Bulletin No. 83-01 will be performed, and the breaker surveillance testing specified by Action Item No. 1 of IE Bulletin No. 83-01 will be repeated. The results of the breaker surveillance testing will be submitted to you within seven days of test completion. Until the actions listed in this paragraph are completed, the two reactor scram breakers will not be declared operable.	SCE to NRC LTR 03/18/1983
1983-03-001	In summary, SCE is (1) committing to implement a forced lube oil cooling system to environmentally qualify the AFW pump motors, (2) committing to install the forced lube oil cooling system during the first refueling outage for each unit, (3) providing a detailed description of the forced lube oil system as described above and (4) committing to correct the error in the CPC software at the first refueling outage for each unit. The SONGS 2/3 FSAR will be amended to incorporate the forced lube oil cooling system in conjunction with the next regularly scheduled amendment.	SCE to NRC LTR 03/07/1983
1983-01-001	The Committees report will be submitted to the NRC at least two weeks prior to exceeding 5% power on Unit 3. SCE will submit proposed Technical Specifications for Unit 2 and revised Technical Specifications for Unit 3 upon completion of our review.	SCE to NRC LTR 01/11/1983
1982-07-001	Consistent with the above commitment, SCE is currently finalizing the scope of work for preparation of responses to the NRC questions and will transmit these responses to the NRC by June 30, 1983.	SCE to NRC LTR 07/30/1982
1982-01-001	Drafts of Combustion Engineering Owners Group generic procedure guidelines are presently scheduled for submittal to NRC for approval by approximately April 1, 1982. Southern California Edison will incorporate the approved guidelines into SONGS-2 emergency procedures at the first refueling after January 1, 1983.	SCE to NRC LTR 01/27/1982
1981-10-002	As many operators as possible will participate in the actual performance of the planned cooldown presently scheduled for performance during the power ascension program as outlined in FSAR Section 14.2.12.105.	SCE to NRC LTR 10/21/1981

Commitment Number	Verbatim Commitment to NRC	Commit Source
1981-10-001	Station operating instruction S023-3-2.31 will be utilized to perform this evolution and contains several provisions and precautions to deal with the prevention or mitigation of reactor vessel voiding. Included are precautions delineating symptoms of inadequate core cooling, the minimum subcooled margin to be maintained and maximum cooldown rate to avoid head voiding. Steps of the procedure, requiring operator verification, include continuous monitoring for void formation during depressurization as well as actions to be taken should evidence of void formation exist.	SCE to NRC LTR 10/21/1981
1981-09-001	SCE will incorporate appropriate administrative controls in the operating procedures for dning/fluid pumping of these tanks to preclude damage by vacuum conditions.	SCE to NRC LTR 09/29/1981
1981-08-001	The permanent corrective action will be to modify the control circuitry for MOV 1100 B, C, and D to incorporate a seal in/reset function on ESF actuation. This action is scheduled to be completed during the next refueling outage.	SCE to NRC LTR 08/06/1981
1981-07-001	Enclosed are sixty-three (63) copies of the response to the NRC interim, six month information request in the December 22, 1980 letter, concerning compliance with NUREG-0612, Control of Heavy Loads. As requested in your December 22, 1980 letter, SCE confirms that implementation of changes and modifications determined to be necessary will commence as soon as possible without waiting on NRC Staff review, so that all such changes, beyond the interim action, will be completed within two tears of submittal of the final, nine month response to the December 22,1980 information request.	SCE to NRC LTR 07/07/1981
1981-06-002	Testing to verify the adequacy of the systems under maximum noise conditions will be completed within 30 days of the unit return to sustained full load operation. Should the testing indicate that adjustments and/or repairs to systems components are necessary, corrective action will be taken to satisfy the bulletin requirements.	SCE to NRC LTR 06/15/1981

Commitment Number	Verbatim Commitment to NRC	Commit Source
1981-06-001	The physical modifications will be complete and the systems functionally servicable at the time the unit returns to service. In order to assure that the audibility of the equipment meets design specification, plant operation at or near full load is required to establish the maximum background noise levels prior to completing the systems tests.	SCE to NRC LTR 06/15/1981
1981-05-001	This information will be incorporated into the FSAR text, and direct distribution of this information will be made as part of the Amendment 25 distribution and will be in accordance with the service list provided by SCE's letter of October 29, 1979. An affidavit attesting to the fact that distribution has been completed will be provided within ten days of docketing of Amendment 21.	SCE to NRC LTR 05/07/1981
1981-02-001	All mechanical snubbers on safety-related systems will be inspected in accordance with IE Bulletin 81-01 prior to return to power from this outage. Within sixty (60) days of the completion of this mechani snubber inspection, a report of the results will be submitted to you.	SCE to NRC LTR 02/27/1981
1980-12-001	However, prior to returning to power from this outage, SCE will determine if any safety-related valves have parts cast by Malcolm Foundry Company, Inc. If it is determined that there are such parts: a) a visual inspection of those valve parts will be performed , b) a schedule for replacing potentially defective parts will be provided, and c) the value manufacturer(s) will be identified.	SCE to NRC LTR 12/10/1980

Commitment Number	Verbatim Commitment to NRC	Commit Source
1980-05-006	We are presently reviewing existing procedures to determine any changes that may be appropriate to accomodate the effects identified in the FMEA. In addition, a new procedure will be developed for the loss of a 120V AC bus which will include the following : a) The diagnostics/alarms/indications/symptoms resulting from the loss of a 120v AC bus as developed in failure Modes and Effects Analysis. b) The use of alternative indication and/or control circuits which may be powered from other non-class 1-E instrumentation and control buses. c) Methods for restoring power to the bus. d) Methods to be used in bringing the plant to a cold shutdown condition. This new procedure and changes to existing procedures will be implemented prior to return to power at the completion of the current refueling outage.	SCE to NRC LTR 05/15/1980
1980-05-005	Place the power supply to the solenoid valve of the following valves on separate buses: CV202, CV203, CV204. These three valves are the isolation valves on the three normal letdown orifices. m is would prevent complete isolation of normal letdown on loss of one bus. This change will be completed during the next maintenance outage of sufficient duration.	SCE to NRC LTR 05/15/1980
1980-05-004	Install indicator lights in the control room to alert the operator as to which bus is experiencing a loss of power. This will be completed prior to returning to power at the completion of the current refueling outage.	SCE to NRC LTR 05/15/1980
1980-05-003	As part of our responses to Items 1 and 2 above, we will provide proposed corrective actions, a schedule for completion of the corrective actions, and a description of any interim actions, it necessary.	SCE to NRC LTR 05/12/1980
1980-05-002	In conjunction with the scoping studies discussed above, a review oi the San Onofre Unit 1 main steam line break core response analysis is being conducted. The review will consider all of the aspects identified in Item 2 of your request. The results of the review will be provided by May 16,1980.	SCE to NRC LTR 05/12/1980

Commitment Number	Verbatim Commitment to NRC	Commit Source
1980-05-001	The scoping studies will include the effect of auxiliary feedwater runout flow as well as the impact of other energy sources such as the addition of main feedwater or condensate flow due to the response of the feedwater control valves during the transient.	SCE to NRC LTR 05/12/1980
1980-03-003	As agreed in our telephone discussion of March 24, 1980, we will complete and forward our response to Bulletin 79-27 to your office by May 15, 1980. This response will include: 1. Completion of the failure mode and effects analysis required by Item 1 of the Bulletin. 2. A description of and new procedures or revisions of the old procedures and date of their implementation. 3. A description of the conceptual design modifications with schedule required by the results of the analysis.	SCE to NRC LTR 03/25/1980
1980-03-001	SCE will implement an inspection program in accordance with the requirements of NRC IE Bulletin No. 79-13, Revision 2 and your letter of November 14, 1979.	SCE to NRC LTR 03/04/1980
1980-01-002	Those safety-related piping systems for which seismic analysis design documents have not been retrieved will be evaluated as part of the Seismic Reevaluation Program at San Onofre Unit I, which has now been integrated into the Systematic Evaluation Program.	SCE to NRC
2013-06-002	Complete ERO training regarding multi-unit, multi-source dose assessment by manually summing the individual dose assessment results for each unit.	SCE letter to NRC 6/28/2013
2013-06-001	Revise procedures to incorporate multi-unit, multi-source dose assessment by manually summing the individual dose assessment results for each unit.	SCE letter to NRC 06/28/2013
2010-10-144	Track commitment in October 2010 supplemental submittal on 73.55 Exemption to complete Room 112 CCTV work	SCE letter to NRC 10/17/2010
2010-08-009	Modify the ECP procedure S0123-XXIV-10.1, Att. 12), to provide the engineer responsible for installing the design change with guidance as to when SPI owner must be notified of a field change.	SCE letter to NRC 08/30/2010
2010-07-002	SCE will perform a supplemental site-wide Emergency Plan drill within 60 days of issuance of this letter.	SCE letter to NRC 7/30/2010

Commitment Number	Verbatim Commitment to NRC	Commit Source
2009-12-007	As discussed in the public meeting, SCE commits to perform additional confirmatory examinations of the divider plate welds following the installation of the RSGs for both Units 2 and 3. The examinations will consist of remote visual examinations of the accessible areas of the divider plate to channel head and tubesheet welds and repeat baseline straight beam ultrasonic examinations from the accessible locations outside the channel head. Examinations will be performed during the first steam generator inspection outage and in a steam generator inspection outage near the end of the first 10-year inspection interval for the RSGs for each unit."	SCE letter to NRC 12/07/2009
2009-11-003	This supplemental response credit the replacement of Units 2 and 3 steam generators. The Unit 3 replacement steam generators are scheduled to be installed during the fall 2010 cycle refueling outage.	SCE letter to NRC 11/12/2009
2009-04-062	Modify the switchyard delay barrier at the south switchyard stairwell to increase the creditable delay time. The switchyard stairwell razor wire on the north side of the switchyard has been installed.	SCE letter to NRC 01/13/2009
2009-04-061	Modify the switchyard delay barrier at the north switchyard stairwell to increase the creditable delay time. The switchyard stairwell razor wire on the north side of the switchyard has been installed.	SCE letter to NRC 01/13/2009
2008-10-005	An Engineering procedure will be developed to formalize SIT monitoring to provide a formal process of quantifying leakage into the low pressure side of the Safety Injection system.	SCE letter to NRC 10/14/2008
2008-10-003	Procedure S023-3-3.8, "Safety Injection Monthly Tests" (Reference 17) specifies that one of the objectives is to vent accessible valves on the discharge side. The procedure vents valves on both the suction and discharge sides and vents valves deemed necessary to ensure that the system is sufficiently full without limitations imposed by accessibility. The procedure objective will be revised for clarification only.	SCE letter to NRC 10/14/2008
2008-10-002	Procedure S023-3-2.7.2, "Safety Injection System Removal/Return to Service Operation, (Reference 15) will be revised to include sweeping of the inverted "U" sections in the HPSI Train "A" discharge piping during plant restart until new vents are installed.	SCE letter to NRC 10/14/2008

Commitment Number	Verbatim Commitment to NRC	Commit Source
2008-02-005	If the as-found TSP is outside the as-found predefined acceptance criteria band, the condition shall be entered into the corrective action program for further evaluation	SCE letter to NRC 02/19/2008
2008-02-004	If the as-found TSP is found to be conservative with respect to the AV, and outside the as-found predefined acceptance criteria band, but SCE is able to determine that the relay is functioning as required and can be reset to within the setting tolerance of the limiting TSP, or a value more conservative than the limiting TSP, then the relay may be considered operable. If it cannot be determined that the relay is functioning as required, it shall be declared inoperable and the associated TS actions followed.	SCE letter to NRC 02/19/2008
2008-02-003	If the as-found trip setpoint (TSP) is found to be nonconservative with respect to the allowable value (AV) specified in the TSs, the relay shall be declared inoperable and the associated TS action statement followed	SCE letter to NRC 02/19/2008
2008-02-002	The relay setpoint shall be reset to a value that is within the as-left tolerance of the nominal relay setpoint; otherwise, the relay shall be declared inoperable.	SCE letter to NRC 02/19/2008
2008-02-001	If the as-found relay setpoint is conservative with respect to the Allowable Value but outside its predefined as-found acceptance criteria band, then the relay shall be evaluated to verify that it is functioning as required before returning the relay to service. If the as-found relay setpoint is not conservative with respect to the Allowable Value, the relay shall be declared inoperable	SCE letter to NRC 02/19/2008
2007-11-010	Revise Operation procedure to provide ability to power a spare battery charger from a diesel-backed source. This includes having all preparations in place prior to the 72-hour CT	SCE letter to NRC 11/30/2007
2007-11-009	Include minimum established float voltage values for battery charger in the new LCS Bases.	SCE letter to NRC 11/30/2007
2007-11-008	Include appropriate battery maintenance practices from industry standard IEEE 450-2002, and Reg Guide 1.129, Rev 2, positions 1, 2, 3, 6, and 8 in the new LCS	SCE letter to NRC 11/30/2007

Commitment Number	Verbatim Commitment to NRC	Commit Source
2007-11-007	Appropriate design features will be added to measure float charging current when a swing battery charger is aligned to a Class 1E subsystem battery	SCE letter to NRC 11/30/2007
2007-11-006	Maintain a capacity margin (presently 2%) to account for the uncertainty in the battery capacity assigned by the manufacturer for allowed float current limit of 1.50 amps for 1800 amp-hour batteries and .75 amp for 1260 amphour batteries	SCE letter to NRC 11/30/2007
2007-11-005	Relocate battery parameters of cell voltage, electrolyte level, electrolyte temperature, and float voltage from TS 3.8.6 to proposed Battery Monitoring and Maintenance Program.	SCE letter to NRC 11/30/2007
2007-11-004	Relocate specific gravity monitoring to proposed Battery Monitoring and Maintenance Program. This specific gravity monitoring will be performed prior to each battery discharge test	SCE letter to NRC 11/30/2007
2007-11-003	Relocate the requirements of existing STs 3.8.4.2, 3,4,5 from the TSs to the LCS. Change frequency of existing SR 3.8.4.2 from 92 days to 31 days in LCS	SCE letter to NRC 11/30/2007
2007-11-002	Include minimum established float voltage of 129.0V in proposed TS Bases and LCS.	SCE letter to NRC 11/30/2007
2007-11-001	SCE commits to measuring "As-Found" and "As-Left" data for the relay Dropout and Pickup values within six months of operation at the new setpoints	SCE letter to NRC 11/5/2007
2007-06-001	SCE commits to implement a new calibration protocol for the PICs prior to implementation of the approved emergency plan change	SCE letter to NRC 06/18/2007

Commitment Number	Verbatim Commitment to NRC	Commit Source
2006-08-002	The Shift Manager/Emergency Coordinator will be responsible for assigning a non-shift Units 2/3 licensed operator to notify the NRC following notification of offsite agencies and within one hour of the event declaration. This individual will serve as the Control Room Emergency Notification System (ENS) Communicator to provide additional information as necessary or maintain communication with the NRC if requested until the TSC Red Phone Communicator arrives in the TSC and assumes that responsibility. The Control Room ENS Communicator will fulfill the responsibility of the 30- minute responder as designated in NUREG0654, Table 8-1 for communications and shown in Attachment 2.	SCE letter to NRC 08/28/2006
2005-04-001	Training of procedures S023-13-25 and S0123-XIII-4.10.2, Rev 8 to be completed within 30 days	SCE letter to NRC 04/28/2005
2004-12-007	Following approval of this license amendment request, future revisions to Accident Monitoring setpoint calculations will reflect the AST source term	SCE letter to NRC 12/27/2004
2004-12-006	Raddose V dose assessment software will be evaluated by June 30, 2005, to determine what specific changes may be warranted in order to maintain consistency with the manual dose assessment calculation methodology	SCE letter to NRC 12/27/2004
2004-12-005	Following approval of this license amendment request, the manual dose calculation methodology as described in Emergency Planning Implementation Procedures (EPIPs) and other Emergency Planning guidance documents will be revised to reflect AST methodology	SCE letter to NRC 12/27/2004
2004-12-004	Following approval of this license amendment request (PCN 555), future revisions to UFSAR Chapter 15 design basis accident control room and offsite radiological consequence analyses will be performed using AST methodology	SCE letter to NRC 12/27/2004

Commitment Number	Verbatim Commitment to NRC	Commit Source
1998-12-013	Comply with Risk-Informed Inservice Testing (RI-IST) program submitted in letter dated 12/30/98 includes 457 pages total. Section 3.5 states: "As a living process, components will be reassessed at a frequency not to exceed every other refueling outage (initiated based on Unit 3 refueling outages) to reflect changes in plant configuration, component performance test results, industry experience, and other inputs to the process. The RI-IST reassessment will be completed within 9 months of completion of the outage."	SCE letter to NRC 12/30/1998
1989-04-011	Modify Station procedures to require that during a station blackout event, load group A is connected to battery C and load group B is connected to Battery D with the installed cable after approximately 3 hours into the SBO event (exact cross connect time window to be determined by analysis later).	SCE letter to NRC 04/17/1989
1989-04-010	Install cable and conduit between DC Buses A and C and DC Buses 8 and D (but do not connect);	SCE letter to NRC 04/17/1989
1989-04-009	Minor procedure changes will be implemented in the SBO response procedure to ensure all of the Provisions of NUMARC 87-00, Section 7 are included	SCE letter to NRC 04/17/1989
1989-04-008	San Onofre Unit 2 and 3 currently have an SBO response procedure, S023-13.1, "Station Blackout". This procedure will be reviewed and modified as necessary to satisfy the requirements of NUMARC 87-00, Section 4.2.1	SCE letter to NRC 04/17/1989
1989-04-007	SCE will develop a severe weather response procedure in accordance with NUMARC 87-00, Section 4.2.3	SCE letter to NRC 04/17/1989
1989-04-006	In the event that San Onofre Unit 2 and 3 becomes blacked out, actions necessary to restore power to the switchyard would be fulfilled by Unit 2/3 operators. This procedure will be reviewed. and modified as necessary to meet NUMARC 87-00, Section 4.2.2	SCE letter to NRC 04/17/1989

Commitment Number	Verbatim Commitment to NRC	Commit Source
1989-01-002	<p>Prior to entering an RCS Reduced Inventory Condition, each operating shift and Equipment Control personnel will receive training, which covers plant operation while in such a condition. The purpose of this training will be to increase awareness of the complexities involved while operating with the reactor Coolant System at Midloop. The training will include a discussion of related industry events (including the April 10, 1987 Diablo Canyon loss of residual heat removal (RHR) event), Containment closure control, methods of adding inventory to the RCS, establishing a Hot Leg vent path , indications for monitoring RCS level and temperature, and the necessity of maintaining control over those types of activities which could perturb stability of the RCS. This training will be accomplished within 30 days prior to entering a Reduced Inventory Condition and may be waived if completed within the previous six months. The training material will be periodically updated as the need occurs</p>	<p>SCE letter to NRC 01/05/1989</p>
1988-12-001	<p>To comply with guideline (iii) of Generic Letter 81-12, SCE will implement the following test program for circuit breakers which support Appendix R breaker coordination: ... All Appendix R credited molded case circuit breakers shall be demonstrated operable once per refueling interval by selecting and functionally testing a sample of at least 10% of the Appendix R credited molded case circuit breakers. Circuit breakers selected for functional testing shall be selected on a rotating basis such that, within 10 refueling intervals, the entire population is tested. Testing of these circuit breakers shall demonstrate that Appendix R credited breaker coordination is maintained. For each circuit breaker found inoperable during these functional tests, an additional sample of 10% of all of the circuit breakers of the inoperable type shall also be functionally tested until no more failures are found or all circuit breakers of that type have been functionally tested.</p>	<p>SCE letter to NRC 12/01/1988</p>

ENCLOSURE 3

LIST OF COMMITMENTS APPLICABLE TO
SAN ONOFRE NUCLEAR GENERATING STATION
AS OF APRIL 1, 2019

Commitment Number	Status	Verbatim Commitment to NRC	Commit Source
2015-02-001	Fulfilled	SCE will ensure licensee-controlled documents are in place to require the continuing performance of the Hazardous Cargo Traffic Report. The report will include hazardous cargo traffic on Interstate 5 and the adjacent railway line and be submitted to the NRC regional administrator every three years. <i>Revised commitment: every five years.</i>	SCE to NRC LTR 2/23/2015
2014-09-001	Fulfilled	Procedures will be revised to ensure that walk-downs and patrols [of SFP systems] are periodically (no less than once a shift) performed.	SCE to NRC LTR 9/9/2014
2014-01-001	Working	Report on changes to Mitigating Strategies. Update Commitment Change Report dated 1/2/14. Letter contains Security Related Information, contents of the enclosure were withheld.	SCE to NRC LTR 1/2/14
2013-06-002	Fulfilled	Complete ERO training regarding multi-unit, multi-source dose assessment by manually summing the individual dose assessment results for each unit	SCE to NRC LTR 6/28/13
2013-06-001	Fulfilled	Revise procedures to incorporate multi-unit, multi-source dose assessment by manually summing the individual dose assessment results for each unit.	SCE to NRC LTR 6.28/13
2010-08-009	Fulfilled	Modify the ECP procedure SO123-XXIV-10.1, Att. 12), to provide the engineer responsible for installing the design change with guidance as to when SPI owner must be notified of a field change.	SCE to NRC LTR 8/30/10
2007-09-001	Fulfilled	1)For all heavy load lifts, ensure commitments to safe load paths, load handling procedures, training of crane operators, use of special lifting devices, use of slings, crane design, and inspection, testing, and maintenance of the crane are adequately implemented and reflected in plant procedures.	NEI 08-05
2007-07-001	Fulfilled	SCE will apply a 6.6% reduction to the CECOR computer code determination of fuel assembly burnup for all fuel assemblies prior to determination of the allowable storage location per the proposed TS 4.3.1 and LCS 4.0.100.	SCE to NRC LTR RAI 07/27/2007

Commitment Number	Status	Verbatim Commitment to NRC	Commit Source
2007-01-007	Fulfilled	SCE will conduct training on the mitigation strategy procedures/guidelines. Training on the procedures will be commensurate with the level of training provided for Severe Accident Management Guidelines (SAMGs).	SCE to NRC LTR 01/10/2007
2007-01-006	Fulfilled	SCE will list the viable site specific reactor / containment strategies in appropriate procedures that could be used by emergency response organization or plant personnel given in Table A.6-1 of Enclosure 1. <i>Revised commitment: SCE will include viable site specific strategies #33 and #34 for alternate fire water sources given in Table A.2-4 of Enclosure 1 as site-specific SFP mitigation strategies in appropriate plant procedures that could be used by emergency response organization or plant personnel.</i>	SCE to NRC LTR 01/10/2007
2007-01-005	Fulfilled	SCE will implement the PWR mitigation strategies in plant procedures as described in Tables A.4-1 through A.4-7 of Enclosure 1. [The enhanced strategy given in Table A.4-4 will be implemented following the next refueling outages.]	SCE to NRC LTR 01/10/2007
2007-01-004	Fulfilled	SCE will include the command and control enhancement strategies in plant procedures as described in Table A.3-1 of Enclosure 1.	SCE to NRC LTR 01/10/2007
2007-01-003	Fulfilled	SCE will include the SFP external makeup strategy and SFP external spray strategy in plant procedures as described in Tables A.2-1 through A.2-6 of Enclosure (1).	SCE to NRC LTR 01/10/2007
2006-05-006	Fulfilled	Make informal notification as soon as practicable to appropriate State/Local officials, with follow-up notification to the NRC, as appropriate, regarding significant onsite leaks/spills into groundwater (see Item 2.1) and onsite or offsite water sample results exceeding the criteria in the REMP (see Item 2.2).	SCE to NRC LTR 8/1/2006 NEI 07-07
2006-05-005	Fulfilled	Submit a 30-day report to the NRC for any water sample result for onsite groundwater that is or may be used as a source of drinking water that exceeds the criteria in the licensee's existing REMP for 30-day reporting of offsite water sample results. Copies of 30-day reports for both onsite and offsite water samples will also be provided to the appropriate State agency;	SCE to NRC LTR 8/1/2006 NEI 07-07

Commitment Number	Status	Verbatim Commitment to NRC	Commit Source
2006-05-004	Fulfilled	Document all onsite groundwater sample results and a description of any significant onsite leaks/spills into groundwater for each calendar year in the Annual REMP Report, beginning with the report covering the calendar year 2006;	SCE to NRC LTR 8/1/2006 NEI 07-07
2006-05-003	Fulfilled	Put in place a company/site-specific action plan(s) to help assure timely detection and effective response to situations involving inadvertent radiological releases in groundwater to prevent migration of licensed radioactive material offsite and quantify impacts on decommissioning.	SCE to NRC LTR 8/1/2006 NEI 07-07
2004-12-004	Fulfilled	Following approval of this license amendment request (PCN 555), future revisions to UFSAR Chapter 15 design basis accident control room and offsite radiological consequence analyses will be performed using AST methodology.	SCE to NRC LTR 12/27/2004
2004-12-003	Fulfilled	SCE is making a regulatory commitment to provide information to the NRC annually to support the apportionment of station dose for SONGS U1, U2 & U3 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).	SCE to NRC LTR 12/27/2004
1998-12-001	Fulfilled	SCE will decontaminate and dismantle the facilities and structures that will remain to support spent fuel and Greater Than Class C (GTCC) waste storage in the ISFSI after the spent fuel and GTCC wastes are removed from the site.	SCE to NRC LTR 12/15/1998
1997-11-002	Fulfilled	Revise its 10 CFR 50.59 program to be consistent with NEI 96-07, Revision 1, These requirements are incorporated in SO123-XV-44 Rev 19.	SCE to NRC LTR 11/17/1997
1991-09-001	Fulfilled	We are currently completing the procedures to implement the vendor interface program. These procedures will be completed by October 31, 1991.	SCE to NRC LTR 09/30/1991
1990-03-006	Fulfilled	The consolidated NRC open item and commitment tracking program will be implemented by June 1, 1990. Review of NRC commitments and tracking program documentation will be completed by August 1, 1990.	SCE to NRC LTR 03/19/1990
1990-03-003	Fulfilled	SCE will develop a severe weather response procedure in accordance with NUMARC 87-00.	SCE to NRC LTR 03/12/1990

Commitment Number	Status	Verbatim Commitment to NRC	Commit Source
1981-07-001	Fulfilled	<p>Enclosed are copies of the response to the NRC interim, six month information request in the December 22, 1980 letter, concerning compliance with NUREG-0612, Control of Heavy Loads. As requested in your December 22, 1980 letter, SCE confirms that implementation of changes and modifications determined to be necessary will commence as soon as possible without waiting on NRC Staff review, so that all such changes, beyond the interim action, will be completed within two years of submittal of the final, nine month response to the December 22, 1980 information request.</p>	<p>SCE to NRC LTR 07/07/1981</p>

ENCLOSURE 4

SAN ONOFRE NUCLEAR GENERATING STATION

UNITS 2 AND 3

REVISED TECHNICAL SPECIFICATION BASES PAGES

FOR THE PERIOD

FROM APRIL 1, 2017 THROUGH APRIL 1, 2019

B 3.1 PLANT SYSTEMS

B 3.1.1 Fuel Storage Pool Water Level

BASES

BACKGROUND The minimum water level in the fuel storage pool meets the assumptions of iodine decontamination factors following a fuel handling accident. 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.

A general description of the fuel storage pool design is given in the UFSAR, Section 9.1.2, Reference 1, and the Independent Spent Fuel Pool Cooling System is given in the UFSAR, Section 9.1.3 (Ref. 2). The assumptions of the fuel handling accident are given in the UFSAR, Section 15.1.1.4 (Ref. 3).

APPLICABLE SAFETY ANALYSES The minimum water level in the fuel storage pool meets the assumptions of the fuel handling accident described in Regulatory Guide 1.183 (Ref. 4). The resultant dose to a person at the exclusion area boundary or low population zone is a small fraction of the 10 CFR 50.67 (Ref. 5) limits.

According to Reference 4, there is 23 ft of water between the top of the damaged fuel bundle and the fuel pool surface for a fuel handling accident. With a 23 ft water level, the assumptions of Reference 4 can be used directly. In practice, this LCO preserves this assumption for the bulk of the fuel in the storage racks. In the case of a single bundle, dropped and lying horizontally on top of the spent fuel racks, however, there would be < 23 ft of water above the top of the bundle.

The fuel storage pool water level satisfies Criterion 3 of the NRC Policy Statement.

LCO The specified water level preserves the assumptions of the fuel handling accident analysis (Ref. 3). As such, it is the minimum required for fuel storage and movement within the fuel storage pool.

APPLICABILITY This LCO applies during movement of fuel assemblies (i.e., irradiated fuel, non-irradiated fuel, and the dummy fuel assembly) in the fuel storage pool since the potential for a release of fission products exists.

BASES (continued)

ACTIONS

A.1

When the initial conditions for an accident cannot be met, steps should be taken to preclude the accident from occurring. When the fuel storage pool water level is lower than the required level, the movement of fuel assemblies in the fuel storage pool is immediately suspended. This effectively precludes a spent fuel handling accident from occurring. This does not preclude moving a fuel assembly to a safe position.

SURVEILLANCE
REQUIREMENTS

SR 3.1.1.1

This SR verifies sufficient fuel storage pool water is available in the event of a fuel handling accident. The water level in the fuel storage pool must be checked periodically. The 7 day Frequency is appropriate because the volume in the pool is normally stable. Water level changes are controlled by unit procedures and are acceptable, based on operating experience.

REFERENCES

1. UFSAR, Section 9.1.2.
 2. UFSAR, Section 9.1.3.
 3. UFSAR, Section 15.1.1.4.
 4. Regulatory Guide 1.183.
 - ✓ 5. 10 CFR 50.67.
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