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June 3, 1994

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Amendment Applications 137 and 121, Supplement 1
Changes to Technical Specifications
San Onofre Nuclear Generating Station, Units 2 and 3

Enclosed is Supplement 1 to Amendment Application No. 137 and Amendment Application No. 121 to Facility Operating Licenses NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. These amendment applications, which were submitted December 30, 1993, consist of Proposed Technical Specification Change NPF-10/15-299 for SONGS 2 and 3 (PCN 299).

Supplement 1 is the result of further SCE review of PCN 299, and consists primarily of clarifications and editorial changes to the proposed change. Also included are resolutions to many of the comments received from the NRC on Sections 1.0, 2.0, 3.0, 3.1, 4.0, and 5.0. Supplement 1 includes a description of the changes, with the following attachments:

Attachment A: Marked up Proposed Specifications for Unit 2
Attachment B: Marked up Proposed Specifications for Unit 3
Attachment C: Marked up Proposed Table of Contents and Bases for Unit 2
Attachment D: Marked up Proposed Table of Contents and Bases for Unit 3

As discussed in our December 30, 1993 letter submitting PCN 299, SCE has been pursuing further improvements to the technical specifications. This effort has resulted in: (1) relocation of proposed Technical Specifications 3.3.10, "Fuel Handling Isolation Signal (FHIS)," and 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System," to the Licensee Controlled Specifications; and, (2) different Required Actions/Completion Times for the batteries, given that D1/D2 perform different functions than D3/D4. These changes are also included in Supplement 1.

Finally, our December 30, 1993 letter indicated that two separate PCNs would be submitted in support of PCN 299 (PCN 399, CEA Insertion Limits, and PCN 422, CPIS/Particulate and Iodine Channels). After discussion with the NRC Review Coordinator for the SONGS TSIP submittal, Mr. T. R. Tjader, these PCNs will no longer be required.

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If you have any questions regarding these changes, please let me know.

Sincerely,

Enclosures

cc: L. J. Callan, Regional Administrator, NRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
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ENCLOSURE

SUPPLEMENT 1 TO PCN-299

Description of Changes
(Revised Proposed SONGS Technical Specifications)

Marked-up Proposed Specification:

Unit 2: See Attachment "A"

Unit 3: See Attachment "B"

The following is a description of the changes to proposed change 299 to the SONGS Technical Specifications:

Section 1.0

1. The DOSE EQUIVALENT I-131 definition has been revised from one acceptable bracketed reference in NUREG 1432 to another, more recent, standard. The thyroid dose conversion factors listed in Table E-7 of Regulatory Guide 1.109, has been identified as the appropriate reference.

2. The definition for Controlled LEAKAGE has been deleted to agree with NUREG 1432.

3. Example 1.3-3 of the Completion Times has been deleted. This is consistent with the December 1993 submittal since there are no cases remaining in the proposed TSs with Completion Times in the form "x days AND y days from discovery to meet the LCO". Accordingly, retaining this example in Section 1.3 would not be useful and could potentially lead to confusion.

   Due to this change, the remaining examples have been renumbered as appropriate.

4. A typographic error has been corrected in Example 1.4-3. The word "interval" was previously misspelled.

Section 2.0

1. Revise section 2.2, "SL Violations," Item 2.2.6, "Critical Operation of the unit shall not be resumed until authorized by the NRC" to "Operation (Modes 1 and 2) of the unit shall not be resumed..." This change incorporates the intent of NUREG 1432, while clarifying "Operation" includes only critical operation or approach to critical reactor operation.

Section 3.0

1. The reference to the Safety Function Determination Program has been corrected. The correct Section is 5.6. This change appears in both the specification and its bases.

Section 3.1

1. Add to TS 3.1.1, "Shutdown Margin (SDM) - T_{avg} > 200°F" a new SR 3.1.1.1 and renumber the existing SR 3.1.1.1 to SR 3.1.1.2. The new Table entries for SR 3.1.1.1 are: SURVEILLANCE; "Verify SDM is acceptable with increased allowance for the withdrawn worth of inoperable CEAs," FREQUENCY; "1 hour after detection of inoperable CEA(s) and every 12 hours thereafter."

2. Revise TS 3.1.4, "Moderator Temperature Coefficient (MTC)" to correct MTC units from "Δk F" to "Δk/k/°F."

3. Revise TS 3.1.5, "Control Element Assembly (CEA) Alignment," by deleting the wording "indicated position" from the LCO, REQUIRED ACTIONs A.3.1, A.3.2, B.3, C.2.1, C.2.2, and the word "indicated" from SURVEILLANCE SR 3.1.5.1.

4. Revise TS 3.1.5, "Control Element Assembly (CEA) Alignment," by decreasing the 1 hour Completion Time for Required Actions B.1 and C.1 to 15 minutes. This is consistent with the Completion Time for Required Action A.1.

5. Revise TS 3.1.5, "Control Element Assembly (CEA) Alignment," REQUIRED ACTION C.2.2 by replacing the following text, "LCO 3.1.7, 'Regulating Control Element Assembly (CEA) Insertion Limits'" with, "LCO 3.1.8, 'Part Length Control Element Assembly (CEA) Insertion Limits.'"

6. Revise TS 3.1.5, Control Element Assembly (CEA) Alignment," by deleting Required Action D.1 and the associated 6 hour Completion Time. Correspondingly, Required Action D.2 is relabeled as D.1. Restoration of the inoperable equipment is acceptable as discussed in TS 1.3, "Completion Times"

7. Revise TS 3.1.8, "Part Length Control Element Assembly (CEA) Insertion Limits" page 3.1-18 by adding "(continued)" below Action B and page 3.1-19 by deleting "(continued)" from below the ACTION Table header.

8. Add page 3.1-21a to TS 3.1.9, Figure 3.1.9-1, "Minimum Stored Boric Acid Volume as a Function of Concentration."

9. Revise TS 3.1.10, "Boration Systems - Shutdown." Replace SR 3.1.10.1, "Verify that at least one of the above required flow paths is OPERABLE and each valve ...." with "Verify that at least one of the above required flow paths is OPERABLE and that each valve (manual, power operated or automatic, that is not locked, sealed, or otherwise secured) in the above required flow path is in its correct position."

10. Revise TS 3.1.12, "Special Test Exception (STE) - Modes 2 and 3." LCO 3.1.12 takes exception to LCO 3.1.1, "SHUTDOWN MARGIN (SDM) - Tavg > 200°F:" (Provided the shutdown reactivity available for trip insertion is maintained to at least the equivalent amount of those CEAs actually withdrawn.)" The parenthetical qualification is changed to "(Provided the shutdown reactivity available for trip insertion is equivalent to at least the highest estimated CEA worth.)"

11. Revise TS 3.1.12, "Special Test Exception (STE) - Modes 2 and 3." One of LCO's which 3.1.12 takes exception to is LCO 3.3.1, Table 3.3.1-1, "Reactor Protective System Instrumentation." Under this entry, replace Functions 14 and 15 with Functions 11 and 12.

12. Revise TS 3.1.14, "Special Test Exceptions (STE) - Center CEA Misalignment and Regulating CEA Insertion Limits" by adding ACTION item B: CONDITION; Required Action and associated Completion Time not met." Delete the logical operator "OR" connecting Required Actions A.1.1 and A.1.2. Replace "A.1.1" with "A.1" and "A.1.2" with B.1. In addition, delete "(continued)" after ACTION A.

Section 3.3

1. Specification 3.3.1 has been revised.

   Required Action A.1 has been revised to remove that portion of the action referring to Table 3.3.1-2. This information (Table 3.3.1-2) will be placed in the Licensee Controlled Specifications.

   Table 3.3.1-1 footnote (a) has been corrected to reference Specification 3.1.12 instead of 3.1.10. In addition, the value for the Logarithmic Power Level--High appears to be incorrect on the page due to an error in the reproduction. The value is .93% RTP.

   Footnote (d) has also been revised to reference Specification 3.1.12 instead of 3.1.10.

2. Specification 3.3.2 has been revised.

   The LCO would be modified to include the term "operating" to describe the bypass removal channels. This change is consistent with the proposed LCO 3.3.1.

   The note modifying the Applicability of LCO 3.3.2 has been deleted. The unit is critical by 1E-4%, therefore, this note is not appropriate in the Modes of Applicability for this LCO. Deleting the note will remove this ambiguity.

   Required Action B.3 would be modified to indicate the addressable constant is set for "the applicable CEAC(s) is (are) inoperable." This change is required since only one CEAC may be inoperable, and setting the CPCs to indicate both are inoperable would impose an unnecessarily prohibitive penalty factor for that configuration.

3. Specification 3.3.3 will be revised. Required Action B.3 requires that the RSPT/CEAC Inoperable addressable constant in each CPC is set to indicate that both CEACs are inoperable. The action has been revised to more appropriately state that the CPC is set to indicate that only the applicable CEAC is inoperable.

4. Specification 3.3.4 has been revised. Surveillance Requirement 3.3.4.1 has been split into two SRs. One surveillance is for the RTCBs (31 days), the other is for the RPS Logic (92 days). The RTCBs are currently on a 31 day surveillance.

5. Specification 3.3.5 has been revised.

   Condition E has been modified to specify the specific ESFAS signals, and a new Condition F has been added solely for the RAS. This change is due to the fact that the RAS has a MODE 1 through 4 applicability. Therefore the appropriate action would be to enter MODE 5 in 36 hours.

   Table 3.3.5-1 has also been revised. The placement of Footnote c has been changed and a new footnote e has been added. Footnote e clarifies that an automatic SIAS is required for CSAS.

   Table 3.3.5-2 has been deleted. This information will be placed in the Licensee Controlled Specifications.

6. Specification 3.3.6 has been revised.

   Action C.1 has been modified to state "Initiate action..." This change is intended to clarify the action.

   Table 3.3.6-1 has been clarified with the addition of a new footnote. The footnote would clarify that only portions of the initiation logic necessary for the manual trip ar required in Mode 4.

7. Specification 3.3.7 has been revised. The change is consistent with PCN-429.

8. Specification 3.3.10 would be moved to the Licensee Controlled Specifications. The FHIS is not specifically credited in the safety analyses.

9. The placement of "SURVEILLANCE REQUIREMENTS" has been corrected in Specification 3.3.11.

10. Required Action A.2 of LCO 3.3.13 has been revised. The correct surveillance to perform would be SR 3.1.2.2, not 3.1.2.1.

11. The Completion Time for initiating an alternative method to monitor parameters for Radiation Monitoring Instrumentation, now transferred to the Licensee Controlled Specifications, formerly TS 3.3.3.1 Action 19, would be extended from 72 hours to 7 days. This is because the comparable loss of one-required-instrument in Post Accident Monitoring Instrumentation is 7 days (i.e., proposed San Onofre specification 3.3.11, Action E).

Section 3.4

1. In the SURVEILLANCE REQUIREMENT SR 3.4.5.2 change secondary side water level in each Steam Generator from "≥ 10% (wide range)" to "≥ 50% (wide range"). The minimum Steam Generator level required to provide for adequate primary to secondary heat transfer during natural circulation corresponds to 28% wide range level indication. Total Loop Uncertainty (TLU) of Steam Generator level for a postulated accident was calculated to be 20%. Therefore, the secondary side water level in each Steam Generator was calculated to be 50% (28% + 20% = 48%, and 2% was added for conservatism).

2. In the SURVEILLANCE REQUIREMENT SR 3.4.6.2 change secondary side water level in each Steam Generator from "≥ 10% (wide range)" to "≥ 50% (wide range").

3. In the SURVEILLANCE REQUIREMENT SR 3.4.7.2 change secondary side water level in each Steam Generator from "≥ 10% (wide range)" to "≥ 50% (wide range").

4. In the LCO 3.4.1, "RCS Pressure, Temperature, and Flow Limits," change the wording of the LCO 3.4.1.b.1 statement to: "For RTP ≤ 30%, 520°F ≤ T_c ≤ 557°F." This change replace the statement "limit not applicable" with SONGS Units 2 and 3 specific numbers.

5. In the SR 3.4.1.2 insert the following statement "1. For RTP ≤ 30%, 520°F ≤ T_c ≤ 557°F" immediately after the words: "Verify RCS cold leg temperature:". Also, change numbering of item "1" to "2", and item "2" to "3." This change was made for consistency with the proposed change 4.

6. In the LCO 3.4.16, "RCS Specific Activity," delete the word "iodine" in the LCO statement after the words "The specific..." There is a "DOSE EQUIVALENT I-131 specific activity" and "gross specific activity." The word "iodine" in the LCO statement does not make sense. Also, delete the word "NOTE" under the NOTE modifying REQUIRED ACTIONS A.1 and A.2. This is an editorial change.

7. In the LCO 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," add "or depressurized to less than the PTLR Limit" after the words "the safety injection tanks shall be isolated" in the LCO statement. These words were added to the proposed LCO statement to emphasize the fact that safety injection tanks have an option to be isolated or depressurized to prevent injecting of the cold water in the reactor vessel.

8. In the LCO 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," split the proposed Condition B into Condition B and Condition C. The wording of Condition B will be the same as in the existing B. The word "or" will be deleted from the revised Required Action B.1. The new Condition C will read: "Required Action and associated Completion Time of Condition B not met." The new Required Action C.1 will read: "

Depressurize affected SIT to less than the maximum RCS pressure for existing cold leg temperature allowed in the PTLR." The Completion Time is "12 hours."

The existing Condition C and associated Required Action C.1 and C.2 will be re-named to "Condition D," "D.1," and "D.2." Condition D and associated Required Action D.1 will be re-named to "Condition E," "E.1."

Also, the wording of the Condition E will be slightly modified by changing the words "Condition A, B or C" to "Condition A, C, or D."

9. In the LCO 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," change the wording of the SR 3.4.12.1.2 to: "Verify each SIT is isolated or depressurized less than the PTLR limit." This change was made for consistency with change 7.

10. In the LCO 3.4.12.2, "Low Temperature Overpressure Protection (LTOP) System. RCS Temperature > LTOP Enable Temperature," insert a new Condition B "With one or both SDCS Relief Valve isolation valves in a single SDCS Relief Valve isolation valve pair (valve pair 2HV9337 and 2HV9339 or valve pair 2HV9377 and 2HV9378) closed" and the associated Required Action B.1 "Open the closed valve" "OR" Required Action B.2 "Power-lock open the OPERABLE SDCS Relief Valve isolation valve pair." The associated Completion Time for the Condition B is "24 hours." This change was made to implement Condition D and associated Required Actions from the LCO 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System. RCS Temperature ≤ LTOP Enable Temperature." This requirement of LCO 3.4.12.1 is applicable to the LCO 3.4.12.2.

11. In the LCO 3.4.14, "RCS PIV leakage," in Section A of Table 3.4.14-1, delete spaces in valve numbering for four SDC Suction Isolation valves. This is an editorial change.

12. In the LCO 3.4.1, "RCS Pressure, Temperature, and Flow Limits," delete the word "continued" in the middle of the ACTIONS table. This is an editorial change.

13. In the LCO 3.4.7, "RCS Loops - MODE 5, Loops Filled," change secondary side water level in each Steam Generator from "≥ 10% (wide range)" to "≥ 50% (wide range").

14. In the LCO 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," add "or depressurization to less than the PTLR Limit" after the words "SIT isolation..." in the NOTE 2 of the APPLICABILITY statement. These words were added to the proposed Note 2 statement to emphasize the fact that safety injection tanks have an option to be isolated or depressurized to prevent injecting of the cold water in the reactor vessel.

15. In the SR 3.4.12.1.4 for SONGS Unit 3, change valves numbers from "2HV9337," "2HV9339," "2HV9377," and "2HV9378" to "3HV9337," "3HV9339," "3HV9377," and "3HV9378." This change was made to comply with SONGS Unit 3 existing valve designating system.

16. In the SR 3.4.12.1.5 for SONGS Unit 3, change valves numbers from "2HV9337," "2HV9339," "2HV9377," and "2HV9378" to "3HV9337," "3HV9339," "3HV9377," and "3HV9378." This change was made to comply with SONGS Unit 3 existing valve designating system.

17. In the Table 3.4.14.1, "Reactor Coolant System Pressure Isolation Valves," for Unit 3 change "2" to "3" in valve designators. This change was made to comply with SONGS Unit 3 existing valve designating system.

Section 3.6

1. Page 3.6-4, add Note 3 to Action B of 3.6.2. This provision is part of the current licensing basis and was added to Action A, but omitted from Action B in the submittal.

2. Action E of Specification 3.6.3 has been revised. The action to restore the valves to operable status prior to Mode 5 entry has been changed. The action would now read "Prior to completing next Cold Shutdown if Cold Shutdown entered within 30 days, otherwise within 30 days."

3. The format of the surveillance requirements to Specification 3.6.3 have been made consistent with the Writer's Guide. No changes to the technical content were made.

Section 3.7

1. In LCO 3.7.4, "Atmospheric Dump Valves," in the CONDITION C add the words "for each ADV" after the words "gas supply system capacity ≤ 8 hours." Also, add the words "for each ADV" in the Required Action C.1 statement after the words "nitrogen gas supply system capacity." This change was made for clarity.

2. In LCO 3.7.7.1, "CCW Safety Related Makeup System," in the COMPLETION TIME column for Required Action C.2 change the COMPLETION TIME from "30" to "36." This is an editorial change.

3. In LCO 3.7.7.1, "CCW Safety Related Makeup System," in the Figure 3.7.7.1-1, "TOTAL ALLOWABLE CCW LEAKAGE VERSUS THE PPMU TANK LEVEL," change the legend of the y-axis to "T-056 % Level". This change is for Unit 2 only. The tank number given is correct for Unit 3.

4. Specification 3.7.14 would be moved to the Licensee Controlled Specifications. The PACU is not specifically credited in the safety analyses.

Section 3.8

1. In Surveillance Requirement (SR) 3.8.1.1, delete "indicated" from the verification of power availability for the required offsite circuits to be consistent with other SRs. In addition for San Onofre Unit 3 only the unit designation of the crosstie buses is corrected.

2. In SR 3.8.1.3, change "≥4230 Kw" to "≥4450 Kw." This change is consistent with the Kw loading during performance of this SR.

3. In SR 3.8.1.4 change minimum fuel oil day tank level indication from "≥325 gal" to "≥30 inches" to be consistent with local indication in the Diesel Generator Room.

4. In SR 3.8.1.9, change "≥54 Hz and ≤66 Hz" to "≤66.75 Hz." Following a single load rejection excursion towards a higher than normal frequency is expected. Therefore, the upper limit is more of a concern than the lower limit. The upper frequency limit is derived from 75% of the difference between the nominal speed and the overspeed trip setpoint. limit. This change is consistent with NUREG-1432 and Regulatory Guide 1.9, Revision 3.

5. In SR 3.8.1.10, change "≥4230 Kw" to "≥4450 Kw." This change is consistent with SR 3.8.1.3.

6. In SRs 3.8.1.14 and 3.8.1.15, change "≥4230 Kw" to "≥4450 Kw." This change is consistent with SR 3.8.1.3 and 3.8.1.10. In addition verify in 3.8.1.15 that the Diesel Generators operate ≥ 5 minutes. This change is consistent with Regulatory Guide 1.9, Revision 3.

7. In LCO 3.8.3 Condition A, change "<48,724 gal and >42,960 gal" to "<89% and ≥76%" to be consistent with the percentage level indications provided in the control room. Indicate these limits are required during Mode 1, 2, 3, or 4.

8. In LCO 3.8.3 Condition B, change "<413 gal and >387 gal for the 20 cylinder engine; <370 gal and >348 gal for the 16 cylinder engine" to "<TS_{min} and ≥TS_{inop}." This change is made to be consistent with the markings in the dipsticks used for lube oil level indication.

9. In LCO 3.8.3 add Condition C which specifically applies to the storage tank fuel oil required inventory during Mode 5 or 6. Add Required Action C.1 to restore fuel oil level to within limits and a Completion Time of 48 hours. Renumber the remaining Conditions and Actions Required accordingly.

10. In SR 3.8.3.1 change "≥49,724 gal" to "≥89% level in Mode 1, 2, 3, or 4 and ≥72% level in Mode 5 or 6." The change in level indication is consistent with the percentage level indication in the control room. The 72% percent level is a reduction in fuel oil requirements corresponding to the Modes 5 and 6 DG load requirements.

11. In SR 3.8.3.2 change "≥413 gal for the 20 c4ylinder engine and ≥370 gal for the 16 cylinder engine" to "≥TS_{min} limit." This change is consistent with the dipstick marking for the lube oil level indication.

12. In LCO 3.8.4 Condition A, change "One" to "Train A or Train B" to make the condition specifically apply to either of these trains. Trains C and D electrical power subsystems are provided with their own Required Action and Completion Time.

13. In LCO 3.8.4 add Condition B which specifically applies to electrical power subsystem Trains C and D. Add Required Action B.1 to restore DC electrical power subsystems to operable status and the Completion Time of 72 hours. Renumber the remaining Conditions and Actions Required accordingly.

    The 72 hour Completion Time is based on a PRA which determined that the resulting increase in risk in core damage due to unavailability of Trains C or D is significantly low. The resulting increase in risk of core damage from a year long outage of Train C or D is calculated to be approximately 1.9E-6 per year. A single 72 hour outage of Train C or D represents a 0.05% (1.6E-8) increase in the total core damage from internal events as calculated in the San Onofre Units 2 and 3 Individual Plant Examination (IPE). Also, 72 hour Completion Time reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

14. In SR 3.8.4.7 NOTE, change "72 months" to "60 months." This change is consistent with existing licensing basis.

15. In SR 3.8.4.8 change the frequency from "72 months" to "60 months." This change is consistent with existing licensing basis.

16. In LCO 3.8.7 revise the NOTE to reflect the respective length of time the inverters (Train A or B; Train C or D) may be disconnected from their associated vital buses. This change is made to be consistent with the allowed outage times (AOTs) for the proposed DC electrical power subsystem trains in LCO 3.8.4.

17. In LCO 3.8.7 Condition A, add "Train A or Train B" to make the condition specifically apply to either of these trains. Inverter Trains C and D are provided with their own Required Action and Completion Time.

18. In LCO 3.8.7 add Condition B which specifically applies to inverter Trains C and D. Add the applicable NOTE which is similar to the NOTE in Condition A, Required Action B.1 to restore inverter to operable status, and the Completion Time of 72 hours. Renumber the remaining Conditions and Actions Required accordingly. These changes are made to be consistent with the proposed changes for the DC electrical power subsystem trains in LCO 3.8.4.

19. In LCO 3.8.9 Condition B change "One" to "Train A or Train B" to make the condition specifically apply to either of these trains. Trains C and D AC vital buses are provided with their own Required Action and Completion Time.

20. In LCO 3.8.9 add Condition C which specifically applies to vital bus Trains C and D. Add Required Action C.1 to restore AC vital bus subsystem to operable status and the Completion Time of 72 hours. The 72 hour Completion Time for AC vital bus Trains C or D is consistent with the proposed 72 hour Completion Time for inverter Trains C and D in LCO 3.8.7.

21. In LCO 3.8.9 renumber Condition "C" to "D." Change "One" to "Train A or Train B" to make the condition specifically apply to either of these trains. DC electrical power subsystem Trains C and D are provided with their own Required Action and Completion Time. The Required Action is renumbered D.1 accordingly.

22. In LCO 3.8.9 add Condition E which specifically applies to DC electrical power distribution subsystem Trains C or D. Add Required Action E.1 to restore DC electrical power distribution subsystem to operable status and the Completion Time of 72 hours. The 72 hour Completion Time for Trains C or D is consistent with the proposed 72 hour Completion Time for DC electrical power subsystem Trains C and D in LCO 3.8.4. Renumber the remaining Conditions, Required Actions, and Completion Times for LCO 3.8.9 accordingly.

Section 4.0

1. In the subsection 4.2.2, "Control Element Assemblies," insert the words "and eight part length" after the words "shall contain 83 full length." This is per the current License, and is correctly described in the License Amendment Request, but was omitted from the proposed pages.

2. In the subsection 4.2.1, "Fuel Assemblies," insert the following statements: "They may include: borosilicate glass--(Na_2O-B_2O_3-SiO_2 components), boron carbide--B_4C, zirconium boride--ZrB_2, gadolinium oxide--Gd_2O_3, erbium oxide--Er_2O_3." The proposed change will allow various options. Short cycles would favor the gadolinium oxide, middle length cycles would favor boron carbide, and longer cycles--the erbium oxide. The proposed statements will be included after the words "Discrete Burnable Absorber Rods may be used."

Section 5.0

1. In Section 5.2.2., "Unit Staff," delete current wording of the subsection 5.2.2.a. This wording will be replaced with a paragraph concerning the assignment of non-licensed operators. A new subsection c) concerning the relaxation of crew composition requirements for up to two hours to allow for unexpected absences will be included in Section 5.2.2. Subsequently, current subsections c), d), e) and f) will be renamed d), e), f), and g). This change was made to comply with the revised Standard Technical Specifications.

2. In Section 5.5, "Procedures, Programs, and Manuals," include subsection 5.5.2.8, "Primary Coolant Sources Outside Containment," "5.5.2.9, "Pre-Stressed Concrete Containment Tendon Surveillance Program," 5.5.2.10, "Inservice Testing Program," 5.5.2.11, "Steam Generator (SG) Tube Surveillance Program," 5.5.2.12, "Ventilation Filter Testing Program," and 5.5.2.13, "Diesel Fuel Oil Testing Program." This change was made to comply with the revised Standard Technical Specifications.

3. Section 5.8, "High Radiation Area," will be included in Chapter 5.0, "Administrative Controls," to comply with the Standard Technical Specifications.

4. In the Section 5.6, "Safety Function Determination Program," the generic example which explains a loss of safety function will be included in subsection 5.6.3. Also, the words" (Case A), (Case B), and (Case C) will be included in subsections 5.6.3.a, 5.6.3.b, and 5.6.3.c.

5. In the Section 5.8, "High Radiation Area," in subsection 5.8.1 delete the brackets around the words "Health Physics Technicians" in the first paragraph. This term is applicable at SONGS Units 2 and 3.

6. In the Section 5.8, "High Radiation Area," in subsection 5.8.1 change the words "Radiation Work Permit (RWP)" to "Radiation Exposure Permit (REP)." This is SONGS Units 2 and 3 specific terminology.

7. In the Section 5.8, "High Radiation Area," in subsection 5.8.1.c change the abbreviation "RWP" to "REP." Also, delete the brackets around the words "Radiation Protection Manager." This is SONGS Units 2 and 3 specific terminology.

8. Change the numbering of Section "5.11" to "5.8." This change is editorial.

Generic

1. The Bases are revised as per the attached markups to a) implement the above changes to the TSs, and b) provide further modifications for clarity or to more accurately reflect actual plant configuration.

Marked-up Proposed Table of Contents and Bases:

Unit 2: See Attachment "C"

Unit 3: See Attachment "D"