

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA  
EDISON COMPANY, ET AL. for a Class 103  
License to Acquire, Possess, and Use  
a Utilization Facility as Part of  
Unit No. 2 of the San Onofre Nuclear  
Generating Station

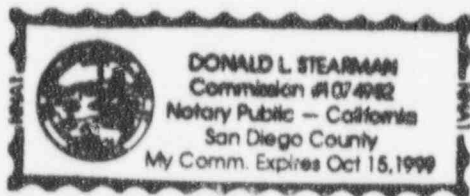
) Docket No. 50-361

) Amendment Application  
No. 154

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby  
submit Amendment Application No. 154.

This amendment application consists of Proposed Change Number NPF-10 456 to  
Facility Operating License No. NPF-10. Proposed Change No. NPF-10 456 is a  
request to revise the San Onofre Unit 2 License Conditions 2.E and 2.G.  
License Condition 2.E is requested to be modified to indicate the physical  
security, security force training and qualification, and safeguards  
contingency plans may contain safeguards information. License Condition 2.G  
is requested to be modified to delete License Condition 2.E from the reporting  
requirements delineated in 2.G.

Subscribed on this 22nd day of December, 1995



Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Richard M. Rosenblum  
Richard M. Rosenblum  
Vice President

State of California  
County of San Diego

On December 22, 1995 before me, Donald L. Stearman,  
personally appeared Richard M. Rosenblum, personally known to  
me to be the person whose name is subscribed to the within instrument and  
acknowledged to me that he executed the same in his authorized capacity,  
and that by his signature on the instrument the person, or the entity upon  
behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Donald L. Stearman

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA  
EDISON COMPANY, ET AL. for a Class 103  
License to Acquire, Possess, and Use  
a Utilization Facility as Part of  
Unit No. 3 of the San Onofre Nuclear  
Generating Station

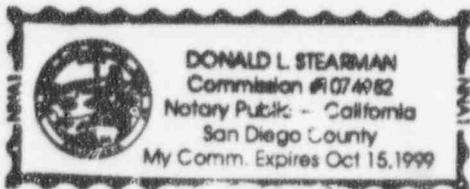
) Docket No. 50-362

) Amendment Application  
) No. 138

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby  
submit Amendment Application No. 138.

This amendment application consists of Proposed Change Number NPF-15 456 to  
Facility Operating License No. NPF-15. Proposed Change No. NPF-15 456 is a  
request to revise the San Onofre Unit 3 License Conditions 2.E and 2.G.  
License Condition 2.E is requested to be modified to indicate the physical  
security, security force training and qualification, and safeguards  
contingency plans may contain safeguards information. License Condition 2.G  
is requested to be modified to delete License Condition 2.E from the reporting  
requirements delineated in 2.G.

Subscribed on this 22nd day of December, 1995.



Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Richard M. Rosenblum

Richard M. Rosenblum  
Vice President

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me to be the person whose name is subscribed to the within instrument and  
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and that by his signature on the instrument the person, or the entity upon  
behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Donald L. Stearman

**DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NUMBER NPF-10/15-456**

Proposed Change Number 456 is a request to revise License Conditions 2.E and 2.G of Facility Operating Licenses NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, respectively.

**EXISTING LICENSE CONDITIONS 2.E and 2.G**

Unit 2: See Attachment 1  
Unit 3: See Attachment 2

**PROPOSED LICENSE CONDITIONS**

Unit 2: See Attachment 3  
Unit 3: See Attachment 4

**DESCRIPTION OF CHANGE**

This proposed change is a request to add the word "may" to License Condition 2.E to indicate the physical protection program plans may contain safeguards information. License Condition 2.E currently indicates the physical security, security force training and qualification, and safeguards contingency plans contain safeguards information. However, the guard training and qualification plan no longer contains safeguards information.

This proposed change also requests the reference to License Condition 2.E be deleted from License Condition 2.G to eliminate the redundant reporting requirement for violations of the physical protection program plans. The reporting requirements and criteria for the physical protection program are specified in 10CFR73.71 and 10CFR73 Appendix G. Therefore, reporting physical protection events under License Condition 2.G is redundant and not necessary.

**DISCUSSION**

This proposed change, which is a request to revise License Conditions 2.E and 2.G, is considered an administrative change. The physical protection program at SONGS will not be changed or modified as a result of PCN-456. The physical protection program will continue to be implemented and maintained in accordance with the NRC approved physical security, security force training and qualification, and safeguards contingency plans.

License Condition 2.E identifies the plans which describe the NRC approved program for physical protection of San Onofre Units 2 and 3. The same plans are identified for San Onofre Unit 1 in License Condition 2.C(4) of the Facility Operations License DPR-13 in Docket 50-206. They are the San Onofre Nuclear Generating Station, Units 1, 2, and 3 Physical Security Plan, the San Onofre Nuclear Generating Station, Units 1, 2, and 3 Security Force Training and Qualification Plan, and the San Onofre Nuclear Generating Station, Units 1, 2, and 3 Safeguards Contingency Plan. License Condition 2.E further indicates the plans contain safeguards information protected under 10CFR73.21. All safeguards information was removed (over a period of time) from the Security Force Training and Qualification Plan and was transferred to the Physical Security Plan and the Safeguards Contingency Plan. The proposed change will clarify that all the plans do not necessarily contain safeguards information.

Included in License Condition 2.G is the requirement to report violations of the requirements contained in License Condition 2.E, the license condition for the physical protection program. The physical protection program has specific reporting requirements located in 10CFR73.71 and 10CFR73 Appendix G. The reporting under License Condition 2.G is duplicative, not specific to the physical protection program, and consequently, unnecessary. This proposed change removes License Condition 2.E, physical protection, from License Condition 2.G, reporting requirements.

#### SAFETY ANALYSIS

1. Will operation of the facility according to this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated.

Response: No

This proposed change is considered an administrative change. It has no impact on the probability or consequences of any of the accidents previously evaluated. This change revises license conditions for clarification and removes the burden of duplicate reporting requirements. This change does not affect the physical protection program as previously approved by the Nuclear Regulatory Commission (NRC). License Condition 2.E is being revised to clarify that the physical security, security force training and qualification, and safeguards contingency plans may or may not contain safeguards information. The security force training and qualification plan does not currently contain safeguards information.

A reporting requirement in License Condition 2.G is being revised to remove the reference to License Condition 2.E for the physical protection program. The reporting requirements for the physical protection program are located in the regulations, 10CFR73.71 and 10CFR73 Appendix G.

Therefore, the probability and consequences of an accident previously evaluated are not affected by these proposed changes.

2. Will operation of the facility according to this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

This proposed change is considered an administrative change. It has no impact on equipment, systems, or structures such that a new or different kind of accident is created. This change revises license conditions to clarify that safeguards information may be located in the physical protection program plans and to remove duplicate and unnecessary reporting requirements for the physical protection program. There is no change associated with the implementation and maintenance of the physical protection program as previously approved by the NRC.

Therefore, the possibility of a new or different kind of accident from an accident previously evaluated is not created.

3. Will operation of the facility according to this proposed change involve a significant reduction in a margin of safety?

Response: No

This proposed change is considered an administrative change only. It has no impact on the margin of safety associated with the physical protection program. This change revises license conditions to clarify the location of safeguards information in the physical protection program plans and remove duplicative and unnecessary reporting requirements for the physical protection program. The maintenance and implementation of the physical protection program is not affected by this change.

Therefore, there will not be a significant reduction in a margin of safety.

#### **SAFETY AND SIGNIFICANT HAZARDS DETERMINATION**

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.92 and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change. Moreover, because this action does not involve a significant hazards consideration, it will also not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.



ATTACHMENT 1  
EXISTING LICENSE CONDITIONS  
UNIT 2

- D. Exemptions to certain requirements of Appendices G, H and J to 10 CFR Part 50 are described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.
- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Physical Security Plan," with revisions submitted through April 22, 1988; "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Security Force Training and Qualification Plan," with revisions submitted through October 22, 1986; and "San Onofre Nuclear Generating Station, Units 1, 2, and 3, Safeguards Contingency Plan," with revisions submitted through December 29, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.
- F. This license is subject to the following additional condition for the protection of the environment:

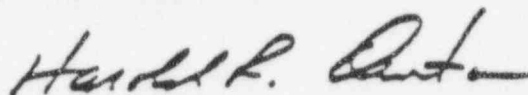
Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor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

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

- G. SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3) through C(13), C(15) through C(22), E, and F of this license within 24 hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region V, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days.
- ii. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
- i. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- J. This license is effective as of the date of issuance and shall expire at midnight on October 18, 2013.

FOR THE NUCLEAR REGULATORY COMMISSION



Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosures:

1. Appendix A (Technical Specifications)
2. Appendix B (Environmental Protection Plan)
3. Appendix C (Antitrust Conditions)

Date of Issuance: FEB 16 1982



ATTACHMENT 2  
EXISTING LICENSE CONDITIONS  
UNIT 3

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Physical Security Plan," with revisions submitted through April 22, 1988; "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Security Force Training and Qualification Plan," with revisions submitted through October 22, 1986; and "San Onofre Nuclear Generating Station, Units 1, 2, and 3, Safeguards Contingency Plan," with revisions submitted through December 29, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.
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- Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.
- G. SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3) through C(11), C(13) through C(22), E, and F of this license within 24 hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region V, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days.

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ATTACHMENT 3  
PROPOSED LICENSE CONDITIONS  
UNIT 2

- D. Exemptions to certain requirements of Appendices G, H and J to 10 CFR Part 50 are described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.
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FOR THE NUCLEAR REGULATORY COMMISSION

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Appendix A (Technical Specifications)
- 2. Appendix B (Environmental Protection Plan)
- 3. Appendix C (Antitrust Conditions)

Date of Issuance: FEB 16 1982



ATTACHMENT 4  
PROPOSED LICENSE CONDITIONS  
UNIT 3

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which may contain Safeguards Information protected under 10 CFR 73.21, are entitled: "San Onofre Nuclear Generating Station, Units 1, 2 and 3 Physical Security Plan," with revisions submitted through April 22, 1988; "San Onofre Nuclear Generating Station, Units 1, 2, and 3 Security Force Training and Qualification Plan," with revisions submitted through October 22, 1986; and "San Onofre Nuclear Generating Station, Units 1, 2, and 3, Safeguards Contingency Plan," with revisions submitted through December 29, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.
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