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. 155

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 155.

This amendment application consists of Proposed Change Number (PCN)-455 to Facility Operating License No. NPF-10. PCN-455 deletes License Condition 2.C(26), "Integrated Implementation Schedule." License Condition 2.C(26) requires implementation and maintenance of a plan for scheduling all capital modifications based on an NRC approved Integrated Implementation Schedule Program Plan.

Subscribed on this 4TH day of JANUARY, 1996.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn

Dwight E. Nunn
Vice President

State of California
County of ~~Orange~~ San Diego
On 1/4/96 before me, BARBARA A. McCARTHY/NOTARY PUBLIC,
personally appeared DWIGHT E. NUNN, 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 Barbara A. McCarthy

BARBARA A. MC CARTHY
COMM. # 1052179
Notary Public — California
ORANGE COUNTY
My Comm. Expires MAR 31, 1999

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. 139

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 139.

This amendment application consists of Proposed Change Number (PCN)-455 to Facility Operating License No. NPF-15. PCN-455 deletes License Condition 2.C(27), "Integrated Implementation Schedule." License Condition 2.C(27) requires implementation and maintenance of a plan for scheduling all capital modifications based on an NRC approved Integrated Implementation Schedule Program Plan.

Subscribed on this 4TH day of JANUARY, 1996.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: _____
Dwight E. Nunn
Vice President

State of California
County of ~~Orange~~ SAN DIEGO
On 1/4/96 before me, BARBARA A. MCCARTHY/NOTARY PUBLIC,
personally appeared DWIGHT E. NUNN, 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 Barbara A. McCarthy

BARBARA A. MC CARTHY
COMM. # 1052179
Notary Public — California
ORANGE COUNTY
My Comm. Expires MAR 31, 1999

ENCLOSURE 1

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-455

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-10/15-455

This is a request to delete License Conditions 2.C(26) and 2.C(27), "Integrated Implementation Schedule," for San Onofre Units 2 and 3, respectively.

Units 2 and 3 License Conditions

Existing License Conditions

Unit 2: See Attachment "A"
Unit 3: See Attachment "B"

Proposed License Conditions

Unit 2: See Attachment "C"
Unit 3: See Attachment "D"

1.0 DESCRIPTION OF CHANGES:

This amendment request is to delete License Conditions 2.C(26) and 2.C(27), "Integrated Implementation Schedule," for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. These license conditions require Southern California Edison (Edison) to implement and maintain a plan for scheduling all capital modifications based on an approved NRC Integrated Implementation Schedule (IIS) Program Plan.

2.0 BACKGROUND:

On August 28, 1986, Edison submitted PCN-218 (Reference 1) to the NRC. It requested a new license condition relating to an Integrated Living Schedule (ILS) for Backfits which was consistent with the recommendations of Generic Letter 83-20, "Integrated Scheduling for Implementation of Plant Modifications" (Reference 2). This PCN was subsequently modified by letters dated November 21, 1986 (Reference 3) and February 1, 1988 (Reference 4) to be consistent with the NRC approved Plan and license condition for the SONGS 1 unit. Additionally, the Plan's name was changed to Integrated Implementation Schedule.

On May 15, 1989, License Amendment Nos. 72 and 60 established an Integrated Implementation Schedule Program via License Conditions 2.C(26) and 2.C(27) (Reference 5) for SONGS 2 and 3, respectively. The goal of this program is the implementation of capital modifications in a stable, controlled manner. Projects with the greatest potential of enhancing the safe operation of the units are given the highest priority. The license conditions require Edison to update its schedules of capital modifications on a semi-annual basis.

3.0 DISCUSSION:

The IIS methodology (Reference 6), which was approved by the NRC, utilizes the Westinghouse Analytical Ranking Process (WARP) to determine the relative potential safety significance of each regulatory committed modification. The methodology requires that after the projects are ranked, they be evaluated using normal scheduling methods to determine their implementation schedules. The highest ranked projects are evaluated first and scheduled for the earliest outage in which implementation constraints of a normal refueling outage would not be exceeded. The schedules of each unit are then separated into the following three lists as described below:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by Edison and which would result in either, (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by Edison as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

Edison initiated plant betterment projects.

The program reflects limited outage time, financial resources, and manpower resources, while at the same time implements those modifications deemed necessary for enhanced plant safety. It provides for integration of all future identified work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of Edison.

The IIS program is based on a priority determination to assist in maximizing the benefit derived from regulatory required capital projects. Since it is not always possible or beneficial to try to implement a large number of capital projects in a single outage, the program provides a mechanism for focusing attention on those projects of highest priority.

Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC. Schedule C dates are provided

for information to allow the NRC to gain perspective on the current backfit load and may be changed at Edison's discretion.

The IIS program requires that Edison monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed. Edison is required to update Schedules A, B, and C semi-annually and submit the revised schedules to the NRC. In addition to updating schedules, Edison is required to:

- Summarize progress in implementing NRC requirements concerning plant modifications.
- Identify changes since the last report.
- Summarize the reasons for schedule changes associated with Schedules A and B.
- Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling/modification outage.

The First Edition of the IIS was sent to the NRC on November 15, 1989. As required, it provided the Schedule A, B, and C items for the Cycle 6 Refueling Outage for SONGS 2 and Cycles 5 and 6 for SONGS 3. Subsequent editions of the IIS (through the 12th Edition) have provided the required schedules through Cycles 9 for SONGS 2 and 3.

Regulatory project allocations for refueling outages have been steadily decreasing and are currently under 40% of resources. Regulatory projects which have been added to schedules since the initial IIS letter have not affected the priority rankings of projects. WARP has only been used once since inception of the IIS Plan. Normal Edison scheduling methods have been used for these new projects. Their implementation schedules were established in separate correspondence, other than the IIS letter. The bulk of the projects found on recent IIS letters have been Schedule C (betterment) projects which have had their worth determined by Edison and are under its control for scheduling purposes.

Examination of SONGS 2 and 3 operating history since inception of the license conditions further illustrates these points. Higher burnups, shorter refueling outages, fewer forced outages, and higher gross and net capacity factors are some of the reasons that fewer new Schedule A and B projects have been included in subsequent refueling outages. Most of the work that has been done during these outages has been restricted to required refueling and maintenance and that which Edison has determined to be betterment (Schedule C).

Consequently, the requirements of the license conditions are redundant to other mechanisms which are in place to respond, track, and implement regulatory projects. Internal mechanisms for responding to NRC Rules and Orders, Notices of Violation, Generic Letters, Licensee Event Reports, etc., are more than adequate to ensure proper control over the

scheduling and implementation of new regulatory required projects generated from these documents. These internal mechanisms more than meet the intent of implementing capital modifications at SONGS 2 and 3 in a stable and controlled manner. Therefore, at this time, the IIS Program is unnecessary.

Retention of the license conditions is an unnecessary burden. Cost savings realized from their deletion are estimated to result in a total present worth savings in excess of $100,000 for the two units over the lifetime of the plant. This savings is based on a $5,000 cost per semi-annual letter for the remaining seventeen years of the licenses for SONGS 2 and 3. Reference 8 states that the NRC does not require licensees to incorporate integrated scheduling into operating licenses as a license condition and that those currently implementing an integrated schedule may withdraw from the program upon notifying the NRC. Additionally, the voluntary nature and intent of the license conditions as detailed in References 2, 7, and Section VII of the license conditions, would allow Edison to reinstate the IIS Plan in the future if it became prudent to do so. Therefore, this PCN requests deletion of the license conditions.

4.0 DISCUSSION OF CHANGES TO PCN-299:

PCN-299 implements the Technical Specification Improvement Project which incorporates the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." PCN-299 was submitted to the NRC for review on December 30, 1993. This proposed change does not affect that submittal.

5.0 SAFETY ANALYSIS:

The proposed change described above shall be deemed to involve a significant hazards consideration if there is any positive finding in any one of the following areas.

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

   Response: No

   The proposed change deletes an administrative means of tracking and scheduling NRC required plant modifications and license commitments. It does not affect the plant configuration nor NRC mandated schedules for implementation of modifications. Because the deletion of the license condition does not affect the plant configuration, no accident analyses are affected; therefore, the proposed change does not increase the probability or consequences of any previously evaluated accident.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any previously evaluated?
Response: No

The proposed change will not alter the configuration of the plant or its operation; therefore, the proposed change does not create a new or different kind of accident from any previously evaluated.

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

Response: No

The proposed change is administrative and does not affect any accident analyses or involve any modification to the plant configuration; therefore, the proposed change does not involve a reduction in a margin of safety.

6.0 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 10 CFR 50.92; 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.

7.0 REFERENCES

1. Letter, Mr. K. P. Baskin (Edison) to Mr. H. R. Denton (NRC) dated August 28, 1986

2. Generic Letter 83-20 dated May 9, 1983; Subject: Integrated Scheduling for Implementation of Plant Modifications

3. Letter, Mr. M. O. Medford (Edison) to Mr. G. W. Knighton (NRC) dated November 21, 1986

4. Letter, Mr. M. O. Medford (Edison) to Document Control Desk (NRC) dated February 1, 1988; Subject: Integrated Implementation Schedule

5. Letter, Mr. D. E. Hickman (NRC) to Mr. K. P. Baskin (Edison) dated May 15, 1989; Subject: Issuance of Amendment No. 72 to Facility Operating License No. NPF-10 and Amendment No. 60 to Facility Operating License No. NPF-15, San Onofre Nuclear Generating Station, Units 2 and 3

6. Letter, Mr. K. P. Baskin (Edison) to Mr. H. R. Denton (NRC) dated September 2, 1983; Subject: Integrated Living Schedule Methodology

7. Generic Letter 85-007 dated May 2, 1985; Subject: Implementation of Integrated Schedules for Plant Modifications

8. Federal Register, Volume 57, No. 185 dated September 23, 1992; Subject: Integrated Schedules; Policy Statement

ATTACHMENT A

EXISTING LICENSE CONDITIONS
UNIT 2

(25) Qualification of Auxiliary Feedwater (AFW) Pump Motor Bearings

By October 30, 1982, SCE shall submit a proposed hardware modification and schedule for implementation that will increase the reliability of the AFW motor-driven pumps in the event of a break in the high energy line feeding the steam-driven pump. In the interim, prior to installation of a hardware modification acceptable to the NRC Staff, SCE shall perform an augmented in-service inspection of the steam line in accordance with SCE's letter of July 12, 1982.

(26) INTEGRATED IMPLEMENTATION SCHEDULE

The Southern California Edison Company (SCE) shall implement a plan for scheduling all capital modifications based on the attached Integrated Implementation Schedule Program Plan (the "Plan").

(1) The Plan shall be followed by the licensee beginning with the effective date of this amendment.

(2) Changes to completion dates for items identified in Schedules B and C of the Plan do not require a license amendment. Dates specified in Schedule A of the Plan shall be changed only in accordance with applicable NRC procedures.

Attachment:
Integrated Implementation Schedule Program Plan

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ATTACHMENT

INTEGRATED IMPLEMENTATION SCHEDULE PROGRAM PLAN
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

I. INTRODUCTION

This document provides the methodology to be used in determining the implementation schedules of capital projects at San Onofre Units 2 and 3.

The program has as its goal the implementation of capital modifications in a stable, controlled manner with the implementation of projects with the greatest potential for enhancing the safe operation of the unit generally given highest priority. The projects of regulatory origin will be ranked using the Westinghouse Analytical Ranking Process to specifically determine the relative potential safety contribution of each modification. The safety ranking will then be used as a primary criterion in scheduling the projects. For betterment projects the priority and schedule will be determined by the Plant Modification Review Committee. The Committee consists of management representatives involved in many areas of plant operation and is the most effective means of determining implementation schedules for those projects necessary for continued or improved plant operation, maintenance, etc.

The program reflects limited outage time, financial and manpower resources, while at the same time implementing those modifications deemed necessary for enhanced plant safety. The plan provides for integration of all future identified work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of SCE.

II. SUMMARY OF PRIORITY DETERMINATION

The Integrated Implementation Schedule is based on a priority determination to assist in maximizing the benefit derived from modifications. Since it is not always possible or beneficial to try to implement a large number of modifications in a single outage, the integrated schedule provides a mechanism for focusing attention on those projects of highest priority.

Regulatory related projects will be ranked using the Westinghouse Analytical Ranking Process. This process was approved for San Onofre Unit 1 by the NRC in a letter from D. G. Eisenhut, to K. P. Baskin, SCE, dated November 16, 1983. SCE will use the same methodology for SONGS 2 and 3. A description of the Westinghouse process was submitted to the NRC by letter dated September 2, 1983 from Kenneth P. Baskin to H. R. Denton.

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AMENDMENT NO. 72

Betterment projects do not always have a major direct safety impact and vary in their effect on operation, maintenance, ALARA, reliability, availability, etc. These projects also vary in magnitude from those requiring a small expenditure of resources to those requiring substantial resources and outage time. In many instances, the implementation of a betterment project may be necessary on an expedited schedule due to a anticipated negative impact on plant operation. Due to these and other factors, the betterment projects have their priority and schedule determined by SCE's Plant Modification Review Committee. The Committee is incorporated into the review cycle for approval of plant modifications by San Onofre Procedure SO123-XIX-3.D. This committee consists of SCE representatives from areas of plant operations and management. In this way, special consideration is given to particular attributes of a betterment project that may make it imperative to implement on an expedited schedule.

III. SCHEDULING

Once the projects are ranked they will be evaluated using normal scheduling methods to determine how long they will take to implement. The projects ranked highest will first be evaluated to determine whether they can be implemented during the next scheduled refueling outage. Projects will continue to be selected from the top of the ranked lists and scheduled for the earliest outage in which implementation constraints of a normal refueling outage have not been exceeded. These schedules will then be separated into three lists as described below:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by SCE and which would result in either (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by SCE as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

SCE initiated plant betterment projects.

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Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC as described in Section V below.

Schedule C dates are provided for information to allow the NRC to gain perspective on the scope of overall modifications and may be changed at SCE's discretion. Schedules A, B and C together provide the basis for assessing the overall effect of changes to schedules and serve as a departure point for discussion between the NRC and SCE regarding such changes, as discussed below.

IV. SCHEDULE MODIFICATIONS

An important aspect of SCE's planning effort is the recognition that the schedule will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that SCE finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond SCE's control. It is important that the procedure used by SCE for changing the schedules be documented. */ In addition, the NRC must play a role in the oversight of the scheduling process and must, in fact, judge the acceptability of proposed date changes in Schedule A. Accordingly, it is important that the NRC's role, and the interaction between the NRC and SCE be clearly defined, as discussed below.

V. SOUTHERN CALIFORNIA EDISON COMPANY RESPONSIBILITIES

The Integrated Implementation Schedule requires that SCE monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

Southern California Edison will update Schedules A, B and C semi-annually and submit the revised schedules to the NRC beginning six months following NRC approval of the Plan. In addition to updating the schedules, SCE will:

- Summarize progress in implementing NRC requirements concerning plant modifications.
- Identify changes since the last report.
- Summarize the reasons for schedule changes associated with Schedules A and B.

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*/ Schedules A, B and C will contain sufficient detail to identify those plant capital modifications with completion dates keyed to fuel cycle outages. The schedules may also contain specific dates (either calendar date or keyed to some other milestone) for major evaluations.

- Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling/ modification outage.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications to the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or SCE actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- Determine the priority of the project, or changed priority, using the Westinghouse Analytical Ranking Process.
- Schedule the new or changed item to avoid rescheduling other items already well underway, if it can be reasonably achieved.
- Alter Schedule B and C items before Schedule A items.
- Select a schedule for the new or changed item which will help maintain an optimum integrated program of work.

If a new Schedule A item is added, regardless of the results of the above ranking/scheduling process, the implementation schedule of the new item shall comply with applicable NRC regulations, orders, or license conditions unless a different schedule has been formally established in accordance with appropriate Commission procedures.

As noted above, no changes will be made to Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after SCE has determined that rescheduling of lower priority work either will not significantly assist in maintaining Schedule A without change, or that the safety, cost or schedule penalties from rescheduling lower priority work significantly outweigh the change in a Schedule A completion date.

SCE will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When SCE determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

SCE will notify NRC in writing at least 30 days before adopting a planned delay for an item in Schedule B. Such notification will also include the reasons for the delay and describe any compensatory actions indicated. The revised date proposed by SCE will go into effect

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unless NRC, in writing, requests further explanation or discussion concerning such change. If NRC makes such a request, it will be made within 15 days of receipt of SCE'S written notification. In this event, discussions will be initiated to promptly develop a schedule date which is mutually acceptable to SCE and the NRC Project Manager while considering overall program impact. The written notification by NRC will serve to extend the schedule date for the period of time required for such discussions. If a new date is established in these discussions such date will supersede the date set forth in Schedule B. The new date will be incorporated in a revised Schedule B in the next semi-annual schedule update submitted to NRC. If a new date cannot be established in these discussions, SCE changes in scheduled dates will be effective unless subsequently modified by NRC Order.

Work items in Schedule C may be rescheduled or work items may be added to Schedule C by SCE without NRC notification. SCE will report changes to Schedule C items in its semi-annual update to be provided in accordance with Section V.A above. This schedule is provided for information purposes only and is intended to provide the NRC a better understanding of the unit's overall modifications program.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the schedules are inevitable, Actions required by the NRC are discussed below:

A. Southern California Edison Originated Changes

1. Upon receipt from SCE of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to act on the request in accordance with applicable procedures.

2. If the request for a modification of Schedule A is denied, the NRC shall promptly inform SCE and provide the reasons for denial.

3. NRC consideration of SCE changes in non-Schedule A items is covered by V.B above.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with this overall regulatory responsibilities and, unless public health,

safety, or interest require otherwise, will take into account the impact of such action on SCE's ability to complete effectively the items on Schedules A, B and C and, in consultation with SCE, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and SCE recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be submitted to the NRC for review in accordance with established procedures, and, if approved by the Commission, will thereupon be reflected in a revised Schedule A submitted by SCE. SCE will inform the NRC of any resulting changes in Schedule B in accordance with Section V above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. For issues on which the NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussion between SCE and the NRC staff. As for the case of NRC originated changes to Schedule A items, the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by SCE.

VII. MODIFICATIONS TO THE PLAN

The licensees and the NRC recognize that the Plan itself may require future modifications. Accordingly, SCE will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes, if approved, will be made effective upon amendment issuance by the NRC.

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ATTACHMENT B

EXISTING LICENSE CONDITIONS
UNIT 3

(25) Correction of CPC Software Error

At the first outage of sufficient duration (7 days in Mode 5) after February 2, 1984, SCE shall correct the software error in the Core Protection Calculators discussed in the SCE letters dated March 7, 1893 and July 22, 1983.

(26) Until the first refueling outage, SCE shall provide a monthly report describing any occurrences resulting in the degradation (including, but not limited to component failures, maintenance errors, and operator errors) of the auxiliary feedwater system. The report shall identify the cause of such occurrences. The report does not relieve the licensee from any existing requirements for Licensee Event Reports (LERs).

(27) INTEGRATED IMPLEMENTATION SCHEDULE

The Southern California Edison Company (SCE) shall implement a plan for scheduling all capital modifications based on the attached Integrated Implementation Schedule Program Plan (the "Plan").

(1) The Plan shall be followed by the licensee beginning with the effective date of this amendment.

(2) Changes to completion dates for items identified in Schedules B and C of the Plan do not require a license amendment. Dates specified in Schedule A of the Plan shall be changed only in accordance with applicable NRC procedures.

4. In accordance with the Memorandum and Order (Ruling on Off-site Medical Services Issue) ASLBP 78-365-010L dated August 12, 1983. Paragraph 2.C(18)c of Amendment No. 4 is hereby deleted.

Attachment:
Integrated Implementation Schedule Program Plan

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ATTACHMENT

INTEGRATED IMPLEMENTATION SCHEDULE PROGRAM PLAN
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

I. INTRODUCTION

This document provides the methodology to be used in determining the implementation schedules of capital projects at San Onofre Units 2 and 3.

The program has as its goal the implementation of capital modifications in a stable, controlled manner with the implementation of projects with the greatest potential for enhancing the safe operation of the unit generally given highest priority. The projects of regulatory origin will be ranked using the Westinghouse Analytical Ranking Process to specifically determine the relative potential safety contribution of each modification. The safety ranking will then be used as a primary criterion in scheduling the projects. For betterment projects the priority and schedule will be determined by the Plant Modification Review Committee. The Committee consists of management representatives involved in many areas of plant operation and is the most effective means of determining implementation schedules for those projects necessary for continued or improved plant operation, maintenance, etc.

The program reflects limited outage time, financial and manpower resources, while at the same time implementing those modifications deemed necessary for enhanced plant safety. The plan provides for integration of all future identified work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of SCE.

II. SUMMARY OF PRIORITY DETERMINATION

The Integrated Implementation Schedule is based on a priority determination to assist in maximizing the benefit derived from modifications. Since it is not always possible or beneficial to try to implement a large number of modifications in a single outage, the integrated schedule provides a mechanism for focusing attention on those projects of highest priority.

Regulatory related projects will be ranked using the Westinghouse Analytical Ranking Process. This process was approved for San Onofre Unit 1 by the NRC in a letter from D. G. Eisenhut, to K. P. Baskin, SCE, dated November 16, 1983. SCE will use the same methodology for SONGS 2 and 3. A description of the Westinghouse process was submitted to the NRC by letter dated September 2, 1983 from Kenneth P. Baskin to H. R. Denton.

Betterment projects do not always have a major direct safety impact and vary in their effect on operation, maintenance, ALARA, reliability, availability, etc. These projects also vary in magnitude from those requiring a small expenditure of resources to those requiring substantial resources and outage time. In many instances, the implementation of a betterment project may be necessary on an expedited schedule due to a anticipated negative impact on plant operation. Due to these and other factors, the betterment projects have their priority and schedule determined by SCE's Plant Modification Review Committee. The Committee is incorporated into the review cycle for approval of plant modifications by San Onofre Procedure SO123-XIX-3.D. This committee consists of SCE representatives from areas of plant operations and management. In this way, special consideration is given to particular attributes of a betterment project that may make it imperative to implement on an expedited schedule.

III. SCHEDULING

Once the projects are ranked they will be evaluated using normal scheduling methods to determine how long they will take to implement. The projects ranked highest will first be evaluated to determine whether they can be implemented during the next scheduled refueling outage. Projects will continue to be selected from the top of the ranked lists and scheduled for the earliest outage in which implementation constraints of a normal refueling outage have not been exceeded. These schedules will then be separated into three lists as described below:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by SCE and which would result in either (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by SCE as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

SCE initiated plant betterment pr· ects.

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Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC as described in Section V below.

Schedule C dates are provided for information to allow the NRC to gain perspective on the scope of overall modifications and may be changed at SCE's discretion. Schedules A, B and C together provide the basis for assessing the overall effect of changes to schedules and serve as a departure point for discussion between the NRC and SCE regarding such changes, as discussed below.

IV. SCHEDULE MODIFICATIONS

An important aspect of SCE's planning effort is the recognition that the schedule will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that SCE finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond SCE's control. It is important that the procedure used by SCE for changing the schedules be documented. */ In addition, the NRC must play a role in the oversight of the scheduling process and must, in fact, judge the acceptability of proposed date changes in Schedule A. Accordingly, it is important that the NRC's role, and the interaction between the NRC and SCE be clearly defined, as discussed below.

V. SOUTHERN CALIFORNIA EDISON COMPANY RESPONSIBILITIES

The Integrated Implementation Schedule requires that SCE monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

Southern California Edison will update Schedules A, B and C semi-annually and submit the revised schedules to the NRC beginning six months following NRC approval of the Plan. In addition to updating the schedules, SCE will:

- Summarize progress in implementing NRC requirements concerning plant modifications.
- Identify changes since the last report.
- Summarize the reasons for schedule changes associated with Schedules A and B.

*/ Schedules A, B and C will contain sufficient detail to identify those plant capital modifications with completion dates keyed to fuel cycle outages. The schedules may also contain specific dates (either calendar date or keyed to some other milestone) for major evaluations.

- Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling/ modification outage.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications to the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or SCE actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- Determine the priority of the project, or changed priority, using the Westinghouse Analytical Ranking Process.

- Schedule the new or changed item to avoid rescheduling other items already well underway, if it can be reasonably achieved.

- Alter Schedule B and C items before Schedule A items.

- Select a schedule for the new or changed item which will help maintain an optimum integrated program of work.

If a new Schedule A item is added, regardless of the results of the above ranking/scheduling process, the implementation schedule of the new item shall comply with applicable NRC regulations, orders, or license conditions unless a different schedule has been formally established in accordance with appropriate Commission procedures.

As noted above, no changes will be made to Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after SCE has determined that rescheduling of lower priority work either will not significantly assist in maintaining Schedule A without change, or that the safety, cost or schedule penalties from rescheduling lower priority work significantly outweigh the change in a Schedule A completion date.

SCE will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When SCE determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

SCE will notify NRC in writing at least 30 days before adopting a planned delay for an item in Schedule B. Such notification will also include the reasons for the delay and describe any compensatory actions indicated. The revised date proposed by SCE will go into effect

unless NRC, in writing, requests further explanation or discussion concerning such change. If NRC makes such a request, it will be made within 15 days of receipt of SCE'S written notification. In this event, discussions will be initiated to promptly develop a schedule date which is mutually acceptable to SCE and the NRC Project Manager while considering overall program impact. The written notification by NRC will serve to extend the schedule date for the period of time required for such discussions. If a new date is established in these discussions such date will supersede the date set forth in Schedule B. The new date will be incorporated in a revised Schedule B in the next semi-annual schedule update submitted to NRC. If a new date cannot be established in these discussions, SCE changes in scheduled dates will be effective unless subsequently modified by NRC Order.

Work items in Schedule C may be rescheduled or work items may be added to Schedule C by SCE without NRC notification. SCE will report changes to Schedule C items in its semi-annual update to be provided in accordance with Section V.A above. This schedule is provided for information purposes only and is intended to provide the NRC a better understanding of the unit's overall modifications program.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the schedules are inevitable., Actions required by the NRC are discussed below:

A. Southern California Edison Originated Changes

1. Upon receipt from SCE of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to act on the request in accordance with applicable procedures.

2. If the request for a modification of Schedule A is denied, the NRC shall promptly inform SCE and provide the reasons for denial.

3. NRC consideration of SCE changes in non-Schedule A items is covered by V.B above.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with this overall regulatory responsibilities and, unless public health,

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safety, or interest require otherwise, will take into account the impact of such action on SCE's ability to complete effectively the items on Schedules A, B and C and, in consultation with SCE, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and SCE recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be submitted to the NRC for review in accordance with established procedures, and, if approved by the Commission, will thereupon be reflected in a revised Schedule A submitted by SCE. SCE will inform the NRC of any resulting changes in Schedule B in accordance with Section V above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. For issues on which the NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussion between SCE and the NRC staff. As for the case of NRC originated changes to Schedule A items, the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by SCE.

VII. MODIFICATIONS TO THE PLAN

The licensees and the NRC recognize that the Plan itself may require future modifications. Accordingly, SCE will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes, if approved, will be made effective upon amendment issuance by the NRC.

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ATTACHMENT C

PROPOSED LICENSE CONDITIONS
UNIT 2

(25) Qualification of Auxiliary Feedwater (AFW) Pump Motor Bearings

By October 30, 1982, SCE shall submit a proposed hardware modification and schedule for implementation that will increase the reliability of the AFW motor-driven pumps in the event of a break in the high energy line feeding the steam-driven pump. In the interim, prior to installation of a hardware modification acceptable to the NRC Staff, SCE shall perform an augmented in-service inspection of the steam line in accordance with SCE's letter of July 12, 1982.

(26) INTEGRATED IMPLEMENTATION SCHEDULE

The Southern California Edison Company (SCE) shall implement a plan for scheduling all capital modifications based on the attached Integrated Implementation Schedule Program Plan (the "Plan").

(1) The Plan shall be followed by the licensee beginning with the effective date of this amendment.

(2) Changes to completion dates for items identified in Schedules B and C of the Plan do not require a license amendment. Dates specified in Schedule A of the Plan shall be changed only in accordance with applicable NRC procedures.

Attachment:
Integrated Implementation Schedule Program Plan

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ATTACHMENT

INTEGRATED IMPLEMENTATION SCHEDULE PROGRAM PLAN
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

I. INTRODUCTION

This document provides the methodology to be used in determining the implementation schedules of capital projects at San Onofre Units 2 and 3.

The program has as its goal the implementation of capital modifications in a stable, controlled manner with the implementation of projects with the greatest potential for enhancing the safe operation of the unit generally given highest priority. The projects of regulatory origin will be ranked using the Westinghouse Analytical Ranking Process to specifically determine the relative potential safety contribution of each modification. The safety ranking will then be used as a primary criterion in scheduling the projects. For betterment projects the priority and schedule will be determined by the Plant Modification Review Committee. The Committee consists of management representatives involved in many areas of plant operation and is the most effective means of determining implementation schedules for those projects necessary for continued or improved plant operation, maintenance, etc.

The program reflects limited outage time, financial and manpower resources, while at the same time implementing those modifications deemed necessary for enhanced plant safety. The plan provides for integration of all future identified work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of SCE.

II. SUMMARY OF PRIORITY DETERMINATION

The Integrated Implementation Schedule is based on a priority determination to assist in maximizing the benefit derived from modifications. Since it is not always possible or beneficial to try to implement a large number of modifications in a single outage, the integrated schedule provides a mechanism for focusing attention on those projects of highest priority.

Regulatory related projects will be ranked using the Westinghouse Analytical Ranking Process. This process was approved for San Onofre Unit 1 by the NRC in a letter from D. G. Eisenhut, to K. P. Baskin, SCE, dated November 16, 1983. SCE will use the same methodology for SONGS 2 and 3. A description of the Westinghouse process was submitted to the NRC by letter dated September 2, 1983 from Kenneth P. Baskin to H. R. Denton.

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Betterment projects do not always have a major direct safety impact and vary in their effect on operation, maintenance, ALARA, reliability, availability, etc. These projects also vary in magnitude from those requiring a small expenditure of resources to those requiring substantial resources and outage time. In many instances, the implementation of a betterment project may be necessary on an expedited schedule due to a anticipated negative impact on plant operation. Due to these and other factors, the betterment projects have their priority and schedule determined by SCE's Plant Modification Review Committee. The Committee is incorporated into the review cycle for approval of plant modifications by San Onofre Procedure SO123-XIX-3.D. This committee consists of SCE representatives from areas of plant operations and management. In this way, special consideration is given to particular attributes of a betterment project that may make it imperative to implement on an expedited schedule.

III. SCHEDULING

Once the projects are ranked they will be evaluated using normal scheduling methods to determine how long they will take to implement. The projects ranked highest will first be evaluated to determine whether they can be implemented during the next scheduled refueling outage. Projects will continue to be selected from the top of the ranked lists and scheduled for the earliest outage in which implementation constraints of a normal refueling outage have not been exceeded. These schedules will then be separated into three lists as described below:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by SCE and which would result in either (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by SCE as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

SCE initiated plant betterment projects.

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Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC as described in Section V below.

Schedule C dates are provided for information to allow the NRC to gain perspective on the scope of overall modifications and may be changed at SCE's discretion. Schedules A, B and C together provide the basis for assessing the overall effect of changes to schedules and serve as a departure point for discussion between the NRC and SCE regarding such changes, as discussed below.

IV. SCHEDULE MODIFICATIONS

An important aspect of SCE's planning effort is the recognition that the schedule will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that SCE finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond SCE's control. It is important that the procedure used by SCE for changing the schedules be documented. */ In addition, the NRC must play a role in the oversight of the scheduling process and must, in fact, judge the acceptability of proposed date changes in Schedule A. Accordingly, it is important that the NRC's role, and the interaction between the NRC and SCE be clearly defined, as discussed below.

V. SOUTHERN CALIFORNIA EDISON COMPANY RESPONSIBILITIES

The Integrated Implementation Schedule requires that SCE monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

Southern California Edison will update Schedules A, B and C semi-annually and submit the revised schedules to the NRC beginning six months following NRC approval of the Plan. In addition to updating the schedules, SCE will:

- Summarize progress in implementing NRC requirements concerning plant modifications.
- Identify changes since the last report.
- Summarize the reasons for schedule changes associated with Schedules A and B.

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*/ Schedules A, B and C will contain sufficient detail to identify those plant capital modifications with completion dates keyed to fuel cycle outages. The schedules may also contain specific dates (either calendar date or keyed to some other milestone) for major evaluations.

- Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling/ modification outage.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications to the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or SCE actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- Determine the priority of the project, or changed priority, using the Westinghouse Analytical Ranking Process.
- Schedule the new or changed item to avoid rescheduling other items already well underway, if it can be reasonably achieved.
- Alter Schedule B and C items before Schedule A items.
- Select a schedule for the new or changed item which will help maintain an optimum integrated program of work.

If a new Schedule A item is added, regardless of the results of the above ranking/scheduling process, the implementation schedule of the new item shall comply with applicable NRC regulations, orders, or license conditions unless a different schedule has been formally established in accordance with appropriate Commission procedures.

As noted above, no changes will be made to Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after SCE has determined that rescheduling of lower priority work either will not significantly assist in maintaining Schedule A without change, or that the safety, cost or schedule penalties from rescheduling lower priority work significantly outweigh the change in a Schedule A completion date.

SCE will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When SCE determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

SCE will notify NRC in writing at least 30 days before adopting a planned delay for an item in Schedule B. Such notification will also include the reasons for the delay and describe any compensatory actions indicated. The revised date proposed by SCE will go into effect

unless NRC, in writing, requests further explanation or discussion concerning such change. If NRC makes such a request, it will be made within 15 days of receipt of SCE'S written notification. In this event, discussions will be initiated to promptly develop a schedule date which is mutually acceptable to SCE and the NRC Project Manager while considering overall program impact. The written notification by NRC will serve to extend the schedule date for the period of time required for such discussions. If a new date is established in these discussions such date will supersede the date set forth in Schedule B. The new date will be incorporated in a revised Schedule B in the next semi-annual schedule update submitted to NRC. If a new date cannot be established in these discussions, SCE changes in scheduled dates will be effective unless subsequently modified by NRC Order.

Work items in Schedule C may be rescheduled or work items may be added to Schedule C by SCE without NRC notification. SCE will report changes to Schedule C items in its semi-annual update to be provided in accordance with Section V.A above. This schedule is provided for information purposes only and is intended to provide the NRC a better understanding of the unit's overall modifications program.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the schedules are inevitable, Actions required by the NRC are discussed below:

A. Southern California Edison Originated Changes

1. Upon receipt from SCE of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to act on the request in accordance with applicable procedures.

2. If the request for a modification of Schedule A is denied, the NRC shall promptly inform SCE and provide the reasons for denial.

3. NRC consideration of SCE changes in non-Schedule A items is covered by V.B above.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with this overall regulatory responsibilities and, unless public health,

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safety, or interest require otherwise, will take into account the impact of such action on SCE's ability to complete effectively the items on Schedules A, B and C and, in consultation with SCE, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and SCE recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be submitted to the NRC for review in accordance with established procedures, and, if approved by the Commission, will thereupon be reflected in a revised Schedule A submitted by SCE. SCE will inform the NRC of any resulting changes in Schedule B in accordance with Section V above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. For issues on which the NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussion between SCE and the NRC staff. As for the case of NRC originated changes to Schedule A items, the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by SCE.

VII. MODIFICATIONS TO THE PLAN

The licensees and the NRC recognize that the Plan itself may require future modifications. Accordingly, SCE will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes, if approved, will be made effective upon amendment issuance by the NRC.

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ATTACHMENT D

PROPOSED LICENSE CONDITIONS
UNIT 3

(25) Correction of CPC Software Error

At the first outage of sufficient duration (7 days in Mode 5) after February 2, 1984, SCE shall correct the software error in the Core Protection Calculators discussed in the SCE letters dated March 7, 1893 and July 22, 1983.

(26) Until the first refueling outage, SCE shall provide a monthly report describing any occurrences resulting in the degradation (including, but not limited to component failures, maintenance errors, and operator errors) of the auxiliary feedwater system. The report shall identify the cause of such occurrences. The report does not relieve the licensee from any existing requirements for Licensee Event Reports (LERs).

(27) INTEGRATED IMPLEMENTATION SCHEDULE

The Southern California Edison Company (SCE) shall implement a plan for scheduling all capital modifications based on the attached Integrated Implementation Schedule Program Plan (the "Plan").

(1) The Plan shall be followed by the licensee beginning with the effective date of this amendment.

(2) Changes to completion dates for items identified in Schedules B and C of the Plan do not require a license amendment. Dates specified in Schedule A of the Plan shall be changed only in accordance with applicable NRC procedures.

4. In accordance with the Memorandum and Order (Ruling on Off-site Medical Services Issue) ASLBP 78-365-01OL dated August 12, 1983. Paragraph 2.C(18) of Amendment No. 4 is hereby deleted.

Attachment:
Integrated Implementation Schedule Program Plan

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AMENDMENT NO. 60

ATTACHMENT

INTEGRATED IMPLEMENTATION SCHEDULE PROGRAM PLAN
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

I. INTRODUCTION

This document provides the methodology to be used in determining the implementation schedules of capital projects at San Onofre Units 2 and 3.

The program has as its goal the implementation of capital modifications in a stable, controlled manner with the implementation of projects with the greatest potential for enhancing the safe operation of the unit generally given highest priority. The projects of regulatory origin will be ranked using the Westinghouse Analytical Ranking Process to specifically determine the relative potential safety contribution of each modification. The safety ranking will then be used as a primary criterion in scheduling the projects. For betterment projects the priority and schedule will be determined by the Plant Modification Review Committee. The Committee consists of management representatives involved in many areas of plant operation and is the most effective means of determining implementation schedules for those projects necessary for continued or improved plant operation, maintenance, etc.

The program reflects limited outage time, financial and manpower resources, while at the same time implementing those modifications deemed necessary for enhanced plant safety. The plan provides for integration of all future identified work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of SCE.

II. SUMMARY OF PRIORITY DETERMINATION

The Integrated Implementation Schedule is based on a priority determination to assist in maximizing the benefit derived from modifications. Since it is not always possible or beneficial to try to implement a large number of modifications in a single outage, the integrated schedule provides a mechanism for focusing attention on those projects of highest priority.

Regulatory related projects will be ranked using the Westinghouse Analytical Ranking Process. This process was approved for San Onofre Unit 1 by the NRC in a letter from D. G. Eisenhut, to K. P. Baskin, SCE, dated November 16, 1983. SCE will use the same methodology for SONGS 2 and 3. A description of the Westinghouse process was submitted to the NRC by letter dated September 2, 1983 from Kenneth P. Baskin to H. R. Denton.

Betterment projects do not always have a major direct safety impact and vary in their effect on operation, maintenance, ALARA, reliability, availability, etc. These projects also vary in magnitude from those requiring a small expenditure of resources to those requiring substantial resources and outage time. In many instances, the implementation of a betterment project may be necessary on an expedited schedule due to a anticipated negative impact on plant operation. Due to these and other factors, the betterment projects have their priority and schedule determined by SCE's Plant Modification Review Committee. The Committee is incorporated into the review cycle for approval of plant modifications by San Onofre Procedure SO123-XIX-3.D. This committee consists of SCE representatives from areas of plant operations and management. In this way, special consideration is given to particular attributes of a betterment project that may make it imperative to implement on an expedited schedule.

III. SCHEDULING

Once the projects are ranked they will be evaluated using normal scheduling methods to determine how long they will take to implement. The projects ranked highest will first be evaluated to determine whether they can be implemented during the next scheduled refueling outage. Projects will continue to be selected from the top of the ranked lists and scheduled for the earliest outage in which implementation constraints of a normal refueling outage have not been exceeded. These schedules will then be separated into three lists as described below:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by SCE and which would result in either (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by SCE as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

SCE initiated plant betterment pr· ects.

Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC as described in Section V below.

Schedule C dates are provided for information to allow the NRC to gain perspective on the scope of overall modifications and may be changed at SCE's discretion. Schedules A, B and C together provide the basis for assessing the overall effect of changes to schedules and serve as a departure point for discussion between the NRC and SCE regarding such changes, as discussed below.

IV. SCHEDULE MODIFICATIONS

An important aspect of SCE's planning effort is the recognition that the schedule will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that SCE finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond SCE's control. It is important that the procedure used by SCE for changing the schedules be documented. */ In addition, the NRC must play a role in the oversight of the scheduling process and must, in fact, judge the acceptability of proposed date changes in Schedule A. Accordingly, it is important that the NRC's role, and the interaction between the NRC and SCE be clearly defined, as discussed below.

V. SOUTHERN CALIFORNIA EDISON COMPANY RESPONSIBILITIES

The Integrated Implementation Schedule requires that SCE monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

Southern California Edison will update Schedules A, B and C semi-annually and submit the revised schedules to the NRC beginning six months following NRC approval of the Plan. In addition to updating the schedules, SCE will:

- Summarize progress in implementing NRC requirements concerning plant modifications.
- Identify changes since the last report.
- Summarize the reasons for schedule changes associated with Schedules A and B.

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*/ Schedules A, B and C will contain sufficient detail to identify those plant capital modifications with completion dates keyed to fuel cycle outages. The schedules may also contain specific dates (either calendar date or keyed to some other milestone) for major evaluations.

- Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling/ modification outage.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications to the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or SCE actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- Determine the priority of the project, or changed priority, using the Westinghouse Analytical Ranking Process.
- Schedule the new or changed item to avoid rescheduling other items already well underway, if it can be reasonably achieved.
- Alter Schedule B and C items before Schedule A items.
- Select a schedule for the new or changed item which will help maintain an optimum integrated program of work.

If a new Schedule A item is added, regardless of the results of the above ranking/scheduling process, the implementation schedule of the new item shall comply with applicable NRC regulations, orders, or license conditions unless a different schedule has been formally established in accordance with appropriate Commission procedures.

As noted above, no changes will be made to Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after SCE has determined that rescheduling of lower priority work either will not significantly assist in maintaining Schedule A without change, or that the safety, cost or schedule penalties from rescheduling lower priority work significantly outweigh the change in a Schedule A completion date.

SCE will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When SCE determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

SCE will notify NRC in writing at least 30 days before adopting a planned delay for an item in Schedule B. Such notification will also include the reasons for the delay and describe any compensatory actions indicated. The revised date proposed by SCE will go into effect

unless NRC, in writing, requests further explanation or discussion concerning such change. If NRC makes such a request, it will be made within 15 days of receipt of SCE'S written notification. In this event, discussions will be initiated to promptly develop a schedule date which is mutually acceptable to SCE and the NRC Project Manager while considering overall program impact. The written notification by NRC will serve to extend the schedule date for the period of time required for such discussions. If a new date is established in these discussions such date will supersede the date set forth in Schedule B. The new date will be incorporated in a revised Schedule B in the next semi-annual schedule update submitted to NRC. If a new date cannot be established in these discussions, SCE changes in scheduled dates will be effective unless subsequently modified by NRC Order.

Work items in Schedule C may be rescheduled or work items may be added to Schedule C by SCE without NRC notification. SCE will report changes to Schedule C items in its semi-annual update to be provided in accordance with Section V.A above. This schedule is provided for information purposes only and is intended to provide the NRC a better understanding of the unit's overall modifications program.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the schedules are inevitable, Actions required by the NRC are discussed below:

A. Southern California Edison Originated Changes

1. Upon receipt from SCE of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to act on the request in accordance with applicable procedures.

2. If the request for a modification of Schedule A is denied, the NRC shall promptly inform SCE and provide the reasons for denial.

3. NRC consideration of SCE changes in non-Schedule A items is covered by V.B above.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with this overall regulatory responsibilities and, unless public health,

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safety, or interest require otherwise, will take into account the impact of such action on SCE's ability to complete effectively the items on Schedules A, B and C and, in consultation with SCE, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and SCE recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be submitted to the NRC for review in accordance with established procedures, and, if approved by the Commission, will thereupon be reflected in a revised Schedule A submitted by SCE. SCE will inform the NRC of any resulting changes in Schedule B in accordance with Section V above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. For issues on which the NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussion between SCE and the NRC staff. As for the case of NRC originated changes to Schedule A items, the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by SCE.

VII. MODIFICATIONS TO THE PLAN

The licensees and the NRC recognize that the Plan itself may require future modifications. Accordingly, SCE will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes, if approved, will be made effective upon amendment issuance by the NRC.

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