

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. 124

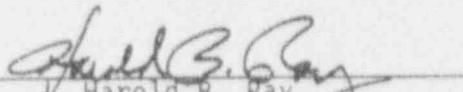
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby
submit Amendment Application No. 124.

This amendment application consists of Proposed Change Number (PCN)-364 to
Facility Operating License No. NPF-10. PCN-364 is a request to (1) reflect
the latest changes in the Southern California Edison nuclear division
organization, (2) incorporate the guidance provided in Generic Letter (GL) 83-
43, "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and
Standard Technical Specifications," (3) transfer the Control Room command
function from the Shift Superintendent to the Control Room Supervisor and
expand the Control Room Area, and (4) make editorial changes to resolve
inconsistencies between Units 2 and 3 Section 6.0 Technical Specifications
(TSs). PCN-364 also proposes to 1) revise License Condition 2.E, "Physical
Security," to delete the specific dates for the revisions to the specified
documents, 2) revise TS Section 1.26, "Reportable Occurrences," and the TS
Index as a result of Section 6.0 changes, 3) revise the TS Index due to the
addition of Table 4.7-2, "Snubber Visual Inspection Interval," and the removal
from the Index of certain sections which were deleted by previous license
amendments, 4) delete License Conditions 2.C.(19)a and 2.C.(19)c as the
requirements are existing in TSs 6.2.2 and 6.2.3, respectively, and 5) delete
Section 7.0, "Special Test Program."

Subscribed on this 16TH day of DECEMBER, 1992.

Respectfully submitted,

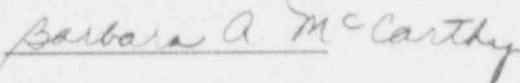
SOUTHERN CALIFORNIA EDISON COMPANY

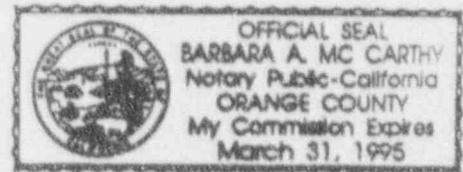
By: 
Harold B. Ray
Senior Vice President

State of California
County of Orange

On 12/16/92 before me, BARBARA A. MCCARTHY / NOTARY PUBLIC,
personally appeared HAROLD B. RAY, 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 



James A. Beoletto
Attorney for Southern
California Edison Company

By: 
James A. Beoletto

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. 108

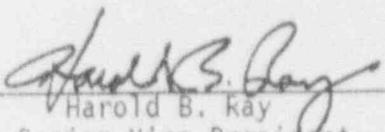
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby
submit Amendment Application No. 108.

This amendment application consists of Proposed Change Number (PCN)-364 to
Facility Operating License No. NPF-15. PCN-364 is a request to (1) reflect
the latest changes in the Southern California Edison nuclear division
organization, (2) incorporate the guidance provided in Generic Letter (GL) 83-
43, "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and
Standard Technical Specifications," (3) transfer the Control Room command
function from the Shift Superintendent to the Control Room Supervisor and
expand the Control Room Area, and (4) make editorial changes to resolve
inconsistencies between Units 2 and 3 Section 6.0 Technical Specifications
(TSs). PCN-364 also proposes to revise 1) License Condition 2.E, "Physical
Security," to delete the specific dates for the revisions to the specified
documents, 2) TS Section 1.26, "Reportable Occurrences," and the TS Index as a
result of Section 6.0 changes, 3) the TS Index due to the addition of Table
4.7-2, "Snubber Visual Inspection Interval," and 4) removal from the index of
certain sections which were deleted by previous license amendments.

Subscribed on this 16TH day of DECEMBER, 1992.

Respectfully submitted,

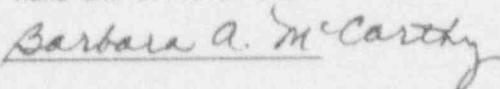
SOUTHERN CALIFORNIA EDISON COMPANY

By: 
Harold B. Ray
Senior Vice President

State of California
County of Orange

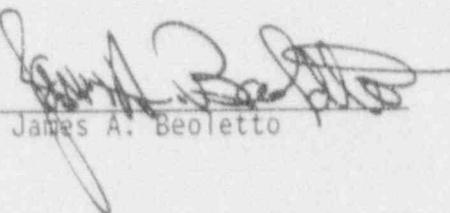
On 12/16/92 before me, BARBARA A. MCCARTHY/NOTARY PUBLIC,
personally appeared HAROLD B. RAY, personally known to
me to be the person whose name is subscribed to the within instrument and
acknowledged to me that he executed the same in his authorized capacity,
and that by his signature on the instrument the person, or the entity upon
behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature 



James A. Beoletto
Attorney for Southern
California Edison Company

By: 
James A. Beoletto

ENCLOSURE 1

PCN-364

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
SECTION 6.0, "ADMINISTRATIVE CONTROLS"

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-364

This is a request to revise Appendix A, Technical Specifications (TSs) Section 6.0, "Administrative Controls," Facility Operating License Condition 2.E, TS 1.26, "Reportable Occurrence," and TS index for San Onofre Units 2 and 3. This is also a request to delete Unit 2 License Conditions 2.C.(19)a, "Station Technical Advisor (I.A.1.1, SSER #1)," 2.C.(19)c, "Independent Safety Engineering Group (I.B.1.2, SSER #1)," and Section 7.0, "Special Test Program."

Existing License Conditions:

The Unit 2 Facility Operating License Condition 2.C.(19) Parts a. and c. read:

"Each of the following conditions shall be completed to the satisfaction of the NRC. Each item references the related subpart of Section 22 of the SER and/or its supplements.

a. Shift Technical Advisor (I.A.1.1, SSER #1)

SCE shall provide a fully trained on-shift technical advisor to the shift supervisor (watch engineer).

c. Independent Safety Engineering Group (I.B.1.2, SSER #1)

SCE shall have an on-site independent safety engineering group."

The Units 2 and 3 Facility Operating License Condition 2.E reads:

"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."

Existing Specifications

Attachment A - Existing Specifications, Unit 2
Attachment B - Existing Specifications, Unit 3

Proposed License Conditions:

The Unit 2 Facility Operating License Conditions 2.C.(19)a, "Shift Technical Advisor (I.A.1.1, SSER #1)," and 2.C.(19)c, "Independent Safety Engineering Group (I.B.1.2, SSER #1)," are deleted.

The Units 2 and 3 Facility Operating License Condition 2.E is revised to read:

"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 including their latest revisions, 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, 1988;~~ 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."

Proposed Specifications

Attachment C - Proposed Specifications, Unit 2
Attachment D - Proposed Specifications, Unit 3

References

1. October 15, 1985, letter from J. A. Zwolinski (NRC) to K. P. Baskin (SCE), Amendment No. 91, Subject: Technical Specifications - Administrative Controls, San Onofre Nuclear Generating Station, Unit 1
2. May 15, 1992, letter from George Kalman (NRC) to Harold B. Ray (SCE), Amendment No. 145, Subject: Issuance of Amendment for the San Onofre Nuclear Generating Station, Unit 1 (TAC Nos. M67932 and M75527)"

DESCRIPTION

CHANGES TO LICENSE CONDITIONS 2.C.(19)a and 2.C.(19)c

Facility Operating License Conditions 2.C.(19)a, "Shift Technical Advisor (I.A.1.1, SSER #1)," and 2.C.(19)c, "Independent Safety Engineering Group (I.B.1.2, SSER #1)," are deleted from Unit 2. The requirements from both license conditions are in TSs 6.2.4 and 6.2.3, respectively.

CHANGES TO LICENSE CONDITION 2.E, "Physical Security"

The Physical Security Plan, Security Force Training and Qualification Plan, and Safeguards Contingency Plan are constantly revised such that the specific dates reflected in the existing license condition would not always be the latest revision of the plans. Therefore, the specific dates are deleted and the verbiage revised to make the license condition reflect current revisions to the plans.

CHANGES TO TS SECTION 1.26, "Reportable Occurrence," AND TS INDEX

TS Section 1.26 and TS index are revised as a result of incorporating in Section 6.0 the guidance provided in Generic Letter (GL) 83-43 "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and Standard Technical Specifications." Similar changes related to reporting requirements were made to San Onofre Unit 1 and were accepted by the NRC as documented in Reference 1.

Other revisions to the TS index include: 1) the renumbering of Section 6.0 pages due to the proposed removal of the Offsite and Onsite Organization (Figures 6.2-1 and 6.2-2) pages which were deleted from the TS previously by Amendment Nos. 68 and 57, 2) the addition of Table 4.7-2, "Snubber Visual Inspection Interval," which was inadvertently omitted from the index during the license amendment request for Amendment Nos. 95 and 85, and 3) the removal of certain TS sections which were deleted previously by Amendment Nos. 83 and 73.

CHANGES TO TS SECTION 6.0, "ADMINISTRATIVE CONTROLS"

Organizational

Section 6.0 is revised to reflect the latest changes in the Southern California Edison (SCE) nuclear organization and clarify personnel responsibilities within the nuclear organization as a result of the changes. These organizational changes increase executive level attention and oversight of nuclear activities. Similar changes were made to Unit 1 and were accepted by the NRC as documented in Reference 1.

Reporting Requirements

Section 6.0 TS changes related to reporting requirements incorporate the guidance provided in GL 83-43, "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and Standard Technical Specifications." Similar

changes related to reporting requirements were made to San Onofre Unit 1 and were accepted by the NRC as documented in Reference 1.

The change to Subsection 6.9.1.8, "Semiannual Radioactive Effluent Release Report," ensures that the report appropriately reflects the quantity of solid radioactive waste that is ultimately shipped to the disposal site.

Other Changes Including Editorial Changes

The transfer of the responsibility for the Control Room command function from the Shift Superintendent (SS) to the Control Room Supervisor (CRS) is made to be more consistent with the regulations and the specific duties and responsibilities of the SS and the CRS. Section 6.0 editorial changes are made to provide consistency with Unit 1 and resolve inconsistencies within Units 2 and 3.

CHANGES TO TS SECTION 7.0, "SPECIAL TEST PROGRAM"

This section specifically permits exceptions to certain TSs affected during the conduct of natural circulation testing. Because the natural circulation testing program was required only during the initial startup testing program and the test was successfully completed, this section is no longer applicable.

BACKGROUND

By letter dated March 7, 1984, SCE submitted License Amendment Application Nos. 24 and 10 consisting of PCN-083 for San Onofre Units 2 and 3, respectively. On May 1, 1984 SCE submitted Amendment Application No. 117 (PCN-130) for San Onofre Unit 1. Both PCN-083 and PCN-130 requested revisions to TS Section 6.0, "Administrative Controls," to 1) reflect changes in SCE's organizational structure, review and approval responsibilities, 2) incorporate the NRC reporting requirements guidance provided in Generic Letter 83-43, and 3) incorporate minor clarifications to Section 6.0 requirements to make the units consistent.

On April 12, 1985, SCE made a combined resubmittal of PCN-083 and PCN-130 and responded to NRC staff questions on the proposed Section 6.0 changes. Followup submittals on PCN-083 were made by SCE letters dated August 2, 1985, August 15, 1985, and May 3, 1988.

On February 7, 1986, SCE submitted PCN-214 as Amendment Application Nos. 33 and 19 for Units 2 and 3. PCN-214 deleted the Special Report and Licensee Event Report requirements from TS 3/4.4.7, "Specific Activity." The Special Reporting requirement was transferred to TS 6.9.1.5 "Annual Reports." PCN-214 was approved on June 25, 1986, as Amendment Nos. 50 and 39.

On September 13, 1988, SCE made a combined submittal of PCN-273 (Amendment Application Nos. 62 and 48 for Units 2 and 3) and PCN-195 (Amendment Application No. 153 for Unit 1). PCN-273 deleted the organization charts and revised the Nuclear Safety Group (NSG) and Independent Safety Engineering Group (ISEG) reporting responsibility in response to GL 88-06, "Removal of

Organization Charts from Technical Specification Administrative Control Requirements." PCN-195 deleted the organization charts and revised the NSG reporting responsibility.

PCN-273 specifically revised Section 6.2.1 "Unit Staff," and added subsections 6.2.1.a through 6.2.1.d to establish lines of authority, responsibility, and communication from the highest management levels through the intermediate levels to all operating organization personnel. Subsection 6.2.2.g was added to designate positions in the onsite organization that require a Senior Reactor Operator's (SRO) license or a Reactor Operator's (RO) license. Figures 6.2-1, "Offsite Organization," and 6.2-2, "Unit Organization," were deleted. ISEG-related Sections 6.2.3.4, "Authority," and 6.2.3.5, "Records," were revised. Section 6.5.3.6 revised the reporting responsibility of the NSG. Both PCN-273 and PCN-195 were approved on October 18, 1988, as Amendment Nos. 68 and 57 for Units 2 and 3, and Amendment No. 110 for Unit 1, respectively.

On February 14, 1989, SCE submitted PCN-285 as Amendment Application Nos. 77 and 63 for Units 2 and 3, respectively. PCN-285 revised TS 6.2.2.g, "Unit Staff," to explicitly require the Assistant Plant Superintendent to maintain a Senior Reactor Operator's license. PCN 285 was approved on May 9, 1989, as Amendment Nos. 71 and 59.

By telephone on April 4, 1989, SCE agreed to withdraw Amendment Application Nos. 24 and 10 (PCN-083) because SCE considered PCN-083 no longer appropriate. By letter dated April 12, 1989, the NRC informed SCE that the NRC would consider PCN-083 to be withdrawn unless SCE notified the NRC within 10 days that PCN-083 was still valid. By letter dated April 25, 1991, the NRC informed SCE that PCN-083 was officially withdrawn.

On September 11, 1989, SCE submitted PCN-293 as Amendment Application Nos. 81 and 67 for Units 2 and 3, respectively. PCN-293 requested in part to revise Section 6.0 TS to incorporate the guidance provided in GL 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications...or to the Process Control Program." PCN-293 included changes to Sections 6.8.4, 6.9.1.6, 6.9.1.7, 6.9.1.9, 6.10.2, 6.13, 6.14, and 6.15. PCN-293 was approved on January 12, 1990, as Amendment Nos. 83 and 73.

The effort to incorporate numerous changes to Section 6.0, "Administrative Controls," and maintain consistency among Units 1, 2, and 3 has been a complicated task. The numerous organizational and administrative changes that have been implemented at San Onofre and the existing differences among the three units have contributed to the difficulty of applying Section 6.0 TS in a consistent manner. To resolve these inconsistencies, a proposed change request is needed.

DISCUSSION

To facilitate the review of PCN-364, the affected TS sections and a discussion of each change are provided below:

CHANGES TO LICENSE CONDITIONS 2.C.(19)a and 2.C.(19)c

Facility Operating License Conditions 2.C.(19)a, "Shift Technical Advisor (I.A.1.1, SSER #1)," and 2.C.(19)c, "Independent Safety Engineering Group (I.B.1.2, SSER #1)," are deleted from Unit 2. The requirements of both license conditions are in TS Sections 6.2.4 and 6.2.3, respectively. These changes make Unit 2 identical to Unit 3.

CHANGES TO LICENSE CONDITION 2.E

In the second sentence of the paragraph, the changes are:

1. After "The plans," "including their latest revisions" is added. This change makes the license condition accurately reflect the latest revisions to the plans.
2. The phrase "with revisions submitted through April 22, 1988;" after "Physical Security Plan," is deleted. The phrase "with revisions submitted through October 22, 1986;" after "Security Force training and Qualification Plan," is deleted. The phrase "with revisions submitted through December 29, 1987;" after "Safeguards contingency Plan," is deleted. These phrases are replaced by the phrase "including their latest revisions," as discussed in Item 1 above.
3. An "" is added after "Safeguards Contingency Plan," to indicate the part referenced by the existing footnote which reads, "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."

CHANGES TO TS SECTION 1.26 AND TS INDEX

TS Section 1.26

The changes are:

1. The TS Section title is changed to "REPORTABLE EVENT" from "REPORTABLE OCCURRENCE."
2. In the first line of the paragraph, "OCCURRENCE" is changed to "EVENT."
3. In the second line of the paragraph, "Specifications 6.9.1.12 and 6.9.1.13" is changed to "Section 50.73 to 10 CFR Part 50."

The above Section 1.26 changes implement the guidance provided in GL 83-43 which were made to the Unit 1 TSs and were approved by the NRC as documented in Reference 1. These changes make the units consistent.

TS Index

The changes are:

1. In Page I Section 1.26, "OCCURRENCE" is changed to "EVENT." This change implement the guidance provided in GL 83-43 which was made to Unit 1 and was approved by the NRC as documented in Reference 1. This change makes the units consistent.
2. In Page XV for Unit 3 and XVI for Unit 2, the changes are:
 - a. Section 6.2.1 - "AND ONSITE ORGANIZATION" is added after "OFFSITE." This change makes the units consistent.
 - b. For both Units 2 and 3, the page numbers for Sections 6.2.2, "UNIT STAFF," through 6.5.3, "NUCLEAR SAFETY GROUP," are renumbered.

Item 2.b changes are due to the renumbering of TS Section 6.0.

3. In Page XVI for Unit 3 and XVII for Unit 2 the changes are:
 - a. Section 6.6 - "REPORTABLE OCCURRENCE ACTION" is changed to "REPORTABLE EVENT ACTION."
 - b. Section 6.9.1 - "ROUTINE REPORTS AND REPORTABLE OCCURRENCES" is changed to "ROUTINE REPORTS."
 - c. "REPORTABLE OCCURRENCES," "PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP," and "THIRTY DAY WRITTEN REPORTS" under Section 6.9.1 are deleted.

Items 3.a through 3.c changes above implement the guidance provided in GL 83-43 which were made to Unit 1 and were approved by the NRC as documented in Reference 1. These changes make the units consistent.

- d. Section 6.15 - is deleted from the Index. This section was deleted from the TS previously by Amendment Nos. 83 and 73.
 - e. For both Units 2 and 3, the page numbers for "AUTHORITY" through Section 6.14, "OFFSITE DOSE CALCULATION MANUAL," are renumbered. This change is due to the renumbering of TS Section 6.0.
4. In Page XVIIa for Unit 3 and XXI for Unit 2 the changes are:
 - a. Figures 6.2-1 and 6.2-2 are deleted from the Index. These figures were deleted from the TS previously by Amendment Nos. 68 and 57.

- b. The page location of Figure 6.2-3, "Control Room Area," is renumbered. This is due to the renumbering of the TS Section 6.0.
 - c. Figures 5.6-1, 5.6-2, 5.6-3, 5.6-4, and 6.2-3 are relocated to the new Index Page XXII for Unit 2.
5. In Page XX the changes are:
- a. "Table 4.7-2, SNUBBER VISUAL INSPECTION INTERVAL" is added. This table was implemented by Amendment Nos. 95 and 85 in TS 3/4.7.6, "Snubbers." However, the corresponding Index for this table was not updated in the license amendment request.
 - b. For Unit 3 Tables 4.11-1, 4.11-2, 3.12-1, 3.12-2, and 4.12-1 are deleted from the Index. For Unit 2, Tables 3.10-1, 4.11-1, 4.11-2, 3.12-1, 3.12-2, and 4.12-1 are deleted from the Index. These changes remove the Index reference for TS tables which were deleted previously by Amendment Nos. 83 and 73.
 - c. For Unit 2 the page number for Section 6.2-1, "Minimum Shift Crew Composition," is changed. This is due to the renumbering of Section 6.0 pages.

CHANGES TO SECTION 6.0, ADMINISTRATIVE CONTROLS

ITEM TS Section

- 1 TS Sections 6.1.1, 6.5.1.7.b, 6.5.2.1, 6.5.2.3, 6.5.2.4, 6.5.2.5, 6.5.2.6, 6.5.2.7, and 6.5.3.7

In these TS sections, "Station Manager" is replaced with "Vice President and Site Manager, Nuclear Generation Site."

The site management has been re-organized such that the Vice President and Site Manager, Nuclear Generation Site is responsible for the overall operation and maintenance of the San Onofre Nuclear Generating Site as well as all site support functions.

The Station Manager reports directly to the Vice President and Site Manager, Nuclear Generation Site. The following responsible Nuclear Division Managers (Station) report directly to the Station Manager:

- 1) Deputy Station Manager
- 2) Manager, Chemistry
- 3) Manager, Maintenance
- 4) Manager, Operations
- 5) Manager, Health Physics
- 6) Manager, Technical.

The following responsible Nuclear Division Managers (Site) report directly to the Vice President and Site Manager:

- 1) Manager, Site Support Services
- 2) Manager, Nuclear Training
- 3) Manager, Industrial Relations
- 4) Manager, Site Security
- 5) Manager, Site Emergency Preparedness
- 6) Manager, Site Technical Services

The proposed change makes the units consistent and reflects a stronger senior management involvement in nuclear generation site activities.

2 TS Section 6.1.1

The proposed changes are:

- a. As stated in Item 1 above, "Station Manager" is replaced with "Vice President and Site Manager, Nuclear Generation Site."
- b. In the first sentence of the paragraph after "overall unit operation and," the phrase "maintenance of Units 2 and 3 at the San Onofre Nuclear Generating Site, and all site support functions" is added.
- c. In the second sentence "He" is added before "shall delegate."

As discussed in Item 1 above, the Vice President and Site Manager, Nuclear Generation Site has assumed responsibility for all site support functions which allows the Station Manager to focus on the safe operation of the generating stations. These changes make the units consistent.

3 TS Section 6.1.2

The proposed changes are:

- a. In the first sentence of the paragraph, change "Supervisor" to "Superintendent," delete "(or during his absence from the Control Room Area, a designated individual)," and change "Control Room command function" to "ultimate command decision authority over all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public."

The change from "Supervisor" to "Superintendent" reflects the correct position title. The other changes are related to the transfer of the "Control Room command function" from the Shift Superintendent (SS) to the Control Room Supervisor (CRS) as appropriate. However, the SS is still the senior position in the operating shift crew and has the ultimate command decision authority and responsibility to direct the overall operation of the

unit(s). The SS maintains a broad perspective of the condition and status of the plant and ensures the conduct of plant activities will not compromise the health and safety of the operating crew, site personnel, and the general public. The SS must not be encumbered with responsibilities to the extent that his shift oversight functions will prevent free movement about the plant. In addition, the duties and responsibilities specified in the Station Emergency Plan direct the attention of the SS to those activities which coordinate site, local, state, and federal agencies response to any accident at the plant which may challenge radiation release boundaries. The SS is required to be onsite at all times when any unit is loaded with fuel. The ultimate command decision authority of the Shift Superintendent is in accordance with the Justification for the Provisions of the Rule published in the Federal Register/Vol. 46, No. 133/Monday, July 11, 1983 Rules and Regulations, 10 CFR 50.54(m)(2)(ii), and 10 CFR 50.47(b)(2).

- b. In the second sentence of the paragraph, "Vice President of Nuclear Operations" is changed to "Vice President and Site Manager, Nuclear Generation Site."

The "Vice President of Nuclear Operations" title no longer exists. As indicated in Item 2, the Vice President and Site Manager is responsible for overall unit operation. The proposed change makes the units consistent.

- c. In the second sentence of the paragraph, "site/" is added before "station." This change makes the units consistent.

4 TS Section 6.1.3

Add this new TS section to read: "The Control Room Supervisor (or during his absence from the Control Room Area, a designated individual with a valid SRO license) shall be responsible for the Control Room command function. The Control Room Supervisor should normally be present in the Control Room and shall be within the Control Room Area defined in Figure 6.2-3."

This change is made to require the CRS to be responsible for the Control Room command function instead of the SS. The position of CRS at San Onofre meets a portion of the requirements of 10 CFR 50.54(m)(2)(iii) which states:

"When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the unit's technical specifications, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times. In addition to this senior operator, a licensed operator or senior operator shall be present at the controls at all times..."

The CRS maintains a broad perspective of the condition and status of the unit(s) he is assigned to. The CRS provides direction to and assessment of the licensed operator's activities and is not required to be "at the controls," which is normally the function of the licensed operator as described in 10 CFR 50.54(m)(2)(iii). The CRS is required to normally spend most of the time in the portion of the Control Room where 1) there is direct and prompt access to information on current unit(s) conditions and 2) the CRS can directly supervise and communicate with the operator at the controls, in accordance with the guidance provided in Regulatory Guide 1.114. However, the CRS should also have the flexibility to periodically move for a brief period of time to other parts of the control room, but within the Control Room Area defined in Figure 6.2-3, to perform his designated duties.

The CRS and his normally continuous presence in the Control Room 1) provides the oversight function of a supervisor so that the probability of correctly detecting abnormal events early enough to mitigate potential adverse consequences will be increased, 2) provides the awareness of plant conditions prior to and resulting from an abnormal event so that his extra experience, knowledge, and training can be used to act promptly to mitigate that event, 3) allows the reactor operator to be able to direct attention to performing the immediate actions necessary to mitigate that event rather than having to brief the CRS about the background of the event if the CRS was absent from the Control Room, 4) allows the continuous monitoring of the conditions of the unit(s), makes decisions based on those conditions, directs operator actions as appropriate to mitigate the consequences of such event, and 5) provides the SS, who will be acting as the Emergency Coordinator for such an event, updated information on the status of the unit(s) during such an event. Therefore, this change is acceptable.

5 TS Section 6.2

In the section heading "AND ONSITE ORGANIZATION" is added after "OFFSITE." This change makes the units' TSs consistent.

6 TS Subsection 5.2.1.c

The changes are:

- a. In the first and third sentences of the paragraph, "Senior" is added before "Vice President," and "Nuclear Engineering, Safety, and Licensing" is deleted after "Vice President." These changes reflect the correct position title of the highest level of management in the nuclear organization.
- b. In the first and second sentences of the paragraph, "Nuclear Generation Site" is added after "Vice President and Site Manager." This change reflects the correct position title.

7 TS Section 6.2.2

For Unit 3 only, "The Unit organization shall be as shown in Figure 6.2-2 and:" is deleted. This figure was deleted by Unit 2 and 3 Amendment Nos. 68 and 57, respectively. This change makes the units consistent.

8 TS Subsection 6.2.2.e

In the second sentence of the paragraph, "Supervisor" is changed to "Superintendent." This change reflects the correct title for the senior position in the operating shift crew at San Onofre.

9 TS Section 6.2.2.f

There are no other changes to Section 6.2.2.f except for the renumbered pages and the reserved spaces for the anticipated changes to this section. The changes to Section 6.2.2.f will be submitted shortly after submittal of PCN-364.

10 TS Section 6.2.2.g

For Unit 2, the changes are:

- a. In the first sentence, add "the Assistant Plant Superintendent-Operations." This change requires the Assistant Plant Superintendent-Operations to have a Senior Reactor Operator's (SRO) license. Consistent with this change, the Assistant Plant Superintendents for Equipment Control and Operations Procedures are not required to have an SRO license. Next, change "senior reactor operator" to "Senior Reactor Operator's." This change is editorial.
- b. In the second sentence, change "reactor operator" to "Reactor Operator's." This change is editorial. Next, add "or Senior Reactor Operator's license" after "license." This change clarifies that the Control Operator or the Assistant Control Operator can have a Senior Reactor Operator's license.

For Unit 3, the changes are:

- a. In the first sentence, add "-Operations" after "Assistant Plant Superintendent" to clarify only this Assistant Plant Superintendent position requires an SRO license and that the Assistant Plant Superintendent positions for Equipment Control and Operations Procedures do not require SRO licenses. Next, change "senior reactor operator" to "Senior Reactor Operator's." This change is editorial.
- b. In the second sentence change "reactor operator" to "Reactor Operator's." This change is editorial. Next, add "or Senior Reactor Operator's license" after "license." This change clarifies

that the Control Operator or the Assistant Control Operator can have a Senior Reactor Operator's license.

- 11 Two existing "intentionally blank" pages, 6-2 and 6-3 for Unit 2 and 6-3 and 6-4 for Unit 3, are deleted. This change cleans up the TS by removing pages that were deleted by previous amendments. These changes are editorial.
- 12 TS Section 6.2 - Table 6.2-1

The proposed changes are:

In the "POSITION" column, "SRO" is changed to "CRS," "RO" is changed to "CO/ACO," and "AO" is changed to "NPEO." These changes reflect the appropriate operating shift crew position titles and make the units consistent. San Onofre uses:

- a. Control Room Supervisor (CRS) who holds a Senior Reactor Operator's (SRO) license for the senior operator in the Control Room.
- b. Control Operator (CO)/Assistant Control Operator (ACO) for the two Reactor Operator (RO) positions required for the minimum shift crew composition. The CO or the ACO must have a Reactor Operator's license but they could have a Senior Reactor Operator's license.
- c. Nuclear Plant Equipment Operator (NPEO) who is not required to hold an RO license. However, an operator with an RO license is allowed to fill the NPEO position. Therefore, the "NPEO" position title is more appropriate.

In the explanation of position titles for Table 6.2-1, the changes are:

- a. For SS, "Supervisor" is changed to "Superintendent." San Onofre uses the title "Shift Superintendent" for the most senior position in the operating shift crew. This change makes the units consistent.

"Operator" is changed to "Operator's" and "License" is changed to "license." These changes are editorial.

"San Onofre" is added before "Units 2 and 3." This change makes the units consistent.

- b. "SRO" is changed to "CRS" and "Individual" is changed to "Control Room Supervisor" as the title for the senior operator in the Control Room. These changes make the units consistent.

Next "Operator License" is changed to "Operator's license." This change is editorial.

Next "San Onofre" is added before "Units 2 and 3." This change makes the units consistent.

- c. "RO" is changed to "CO/ACO," and "Individual" is changed to "Control Operator/Assistant Control Operator. Then "Operator License" is changed to "Operator's license" and, "or a Senior Reactor Operator's license" is added after "Operator's license."

The two Reactor Operator (RO) positions required for the minimum shift crew at San Onofre are filled by a "Control Operator (CO)/Assistant Control Operator (ACO)." The CO or ACO must have a Reactor Operator's license, but the CO or ACO could have a Senior Reactor Operator's license.

Next, "San Onofre" is added before "Units 2 and 3." This change makes the units consistent.

- d. "AO" is changed to "NPEO," and "Auxiliary Operator" is changed to "Nuclear Plant Equipment Operator (Reactor Operator's license not required)."

San Onofre uses NPEO as the title for the additional operators required for the minimum shift crew. This change makes the Units consistent.

- e. In the first and second paragraphs of proposed page 6-6, "Supervisor" after "Shift" is changed to "Superintendent." This change reflects the correct position title for the most senior position in the operating shift crew.

13 Figure 6.2-3 - Control Room Area

This change adds the Operations Support Office, a washroom facility for the male operating crew (the existing washroom is designated for the female operating crew), lunch room, kitchen, Unit 2 and Unit 3 computer rooms, and the turbine laboratory to the boundary of the "Control Room Area" in Figure 6.2-3. This change allows the Control Room Supervisor, who holds the Control Room command function and normally remains in the Control Room, to have the flexibility to access the operations support staff, technical materials area, comfort areas, and other areas required to monitor unit operations for a brief period of time. Therefore, it is appropriate that these rooms be part of the "Control Room Area" in Figure 6.2-3.

14 TS Section 6.2.4

In the first sentence of the paragraph, "Supervisor" after "Shift" is changed to "Superintendent." This change is consistent with the proposed change to TS Section 6.1.2 above.

15 TS Section 6.4

The changes are:

- a. Section 6.4.1 - In the paragraph, "Appendix A of" is deleted. This change is appropriate because Appendix A was deleted from 10 CFR Part 55.
- b. Section 6.4.2 - This new section "A training program for the Fire brigade shall be maintained by the direction of the Manager, Site Emergency Preparedness and shall meet or exceed the requirements of National Fire Protection Association Standard No. 27-1975. This change makes Units 2 and 3 consistent with Unit 1.

16 TS Section 6.5.1.2

The changes are:

- a. "Supervisor of" before "Chemistry" is replaced with "Manager." This change reflects the new position title of the head of Chemistry.
- b. "Manager/" is added before "Supervising Engineer." Also (NSSS, NSSS Support, Computer, or STA" is replaced with "(Nuclear Systems Engineering, Electrical Systems Engineering, or Power Generation)." This change reflects the recent reorganization of the Station Technical Division.

17 TS Section 6.5.1.6

The changes in this section are:

- a. Subsection 6.5.1.6.b - "Review of events requiring 24-hour written notification to the Commission" is changed to "Review of all REPORTABLE EVENTS." This change incorporates the guidance provided in Generic Letter 83-43, related to reporting requirements. A similar change was made to Unit 1 TS and was accepted by the NRC as documented in Reference 1.
- b. Subsection 6.5.1.6.d - "Supervisor" is added after "NSG." This change reflects the correct position title.

18 TS Section 6.5.1.7

The changes in this section are:

- a. Subsection 6.5.1.7.a - "6.5.1.6(a)" is changed to "6.5.1.6.a." This change is editorial.

- b. Subsection 6.5.1.7.b - In the first line of the paragraph, "Manager of Nuclear Operations" is changed to "Vice President and Site Manager, Nuclear Generation Site." In the third line, "the" is added before "NSG" and "Supervisor" is added after "NSG." In the fourth line, "Station Manager" is changed to "Vice President and Site Manager, Nuclear Generation Site" as stated in Item 1.

The above changes reflect the correct position titles.

19 TS Section 6.5.1.8

The changes are:

- a. In the first sentence of the paragraph, "technical specifications" is capitalized and reads "Technical Specifications." This change is editorial.
- b. In the second sentence, "Supervisor" is added after "Nuclear Safety Group." This change reflects the position title instead of the organization title.

20 TS Section 6.5.2.1

The changes are:

- a. In the first sentence of the paragraph, "Station Manager" is changed to "Vice President and Site Manager, Nuclear Generation Site" as stated in Item 1. This change reflects the correct position title. This change was made to Unit 1 and was accepted by the NRC as documented in Reference 1.
- b. "Documentation of these activities shall be provided to the NSG Supervisor" is added as the last sentence of the paragraph. Except for the word "Supervisor," this change was made to Unit 1 and was accepted by the NRC as documented in Reference 1.

21 TS Sections 6.5.2.2 and 6.5.2.3

The changes are:

- a. In both TSs "Documentation of these activities shall be provided to the Vice President and Site Manager, Nuclear Generation Site and to the NSG Supervisor" is added as the last sentence. Except for the word "Supervisor" after "NSG," this change was made to Unit 1 and was accepted by the NRC as documented in Reference 1.
- b. In Section 6.5.2.3 "Station Manager" is changed to "Vice President and Site Manager, Station Generation Site" as stated in Item 1. This change makes the units consistent.

22 TS Section 6.5.2.4

The changes are:

- a. In the first sentence of the paragraph, "station supervisory" before "staff" is replaced with "nuclear division management." Next, "Station Manager" is changed to "Vice President and Site Manager, Nuclear Generation Site." These changes allow other members of the nuclear division management staff, who are not members of the station management staff and do not report directly to the Vice President and Site Manager, to be responsible for Specifications 6.5.2.1 through 6.5.2.3 reviews as they have been previously designated by the Vice President and Site Manager.
- b. In the second sentence, "and a verification that the proposed actions do not constitute an unreviewed safety question." is added. This change makes the units consistent.

23 TS Section 6.5.2.5

The changes are:

- a. In the first sentence of the paragraph "the Manager, Technical, the Manager, Operations, the Manager, Maintenance, the Deputy Station Manager or the Manager, Health Physics as" is replaced with "or members of the nuclear division management staff." Next, "Station Manager" is changed to "Vice President and Site Manager, Nuclear Generation Site."

These changes allow other members of the nuclear division management staff or designees, who are not members of the station management staff and do not report directly to the Station Manager or the Vice President and Site Manager, to perform reviews of proposed tests and experiments as long as they are previously designated by the Vice President and Site Manager. These changes require that reviewers shall be nuclear division manager level position or their designated alternates be formally designated by the most senior management at the site (the Vice President and Site Manager, Nuclear Generation Site).

- b. "Documentation of these activities shall be provided to the Vice President and Site Manager, Nuclear Generation Site and the NSG Supervisor" is added as the second sentence of the paragraph. Except for the word "Supervisor" after "NSG," this change was made to Unit 1 and was accepted by the NRC as documented in Reference 1.

24 TS Section 6.5.2.6

The changes are:

- a. In the first sentence of the paragraph, "station" is changed to "Site," because "Site" encompasses the station, and is therefore more appropriate than "station." Also, the Manager, Site Security reports to the Vice President and Site Manager, Nuclear Generation Site. Therefore, the use of "Site" correctly reflects the reporting responsibilities within the existing organization.

Also, "security program" is changed to "Security Plan." The Site Security Plan is a distinct and separate document with its own implementing procedures. This change distinguishes the Site Security Plan from the general security program for the site.

- b. In the second sentence "to the Site Security Plan" is added after "Recommended changes." "Station Manager" is replaced with "Vice President and Site Manager, Nuclear Generation Site."

Next, after "and transmitted," the phrase "to the Manager of Nuclear Operations and" is deleted. The position "Manager of Nuclear Operations" no longer exists and the Manager, Site Security now reports to the Vice President and Site Manager, Nuclear Generation Site, who is the most senior management level at the site. Therefore, approved changes to the Site Security Plan are transmitted to the NSG Supervisor only.

The responsibility for approval of recommended changes to the Site Security Plan has been shifted from the Station Manager to the Vice President and Site Manager, Nuclear Generation Site. The Manager, Site Security has primary responsibility for Site Security Plan implementing procedures. These changes correctly reflect the responsibilities within the organization.

"Supervisor" is added after "NSG." This change reflects the position title instead of the organization title.

- c. To define the preparation and approval process for implementing procedures, the phrase "; implementing procedures shall be prepared and approved in accordance with Specification 6.8." is added as the last sentence of the paragraph. This change makes the units consistent.

25 TS Section 6.5.2.7

The changes are:

- a. In the first sentence of the paragraph, "station" is changed to "Site," because "Site" encompasses the station, and is therefore more appropriate than "station." Also, the Manager, Site Emergency

Preparedness, reports to the Vice President and Site Manager, Nuclear Generation Site. Therefore, the use of "Site" correctly reflects the reporting responsibilities within the existing organization.

Next "emergency plan" is changed to "Emergency Plan." This change is editorial.

- b. In the second sentence "to the site Emergency Plan" is added after "Recommended changes." This change is editorial.

"Station Manager" is replaced with "Vice President and Site Manager, Nuclear Generation Site." This change is due to the transfer of responsibility.

Next, after "and transmitted," the phrase "to the Manager of Nuclear Operations and" is deleted. The position title "Manager of Nuclear Operations" no longer exists and the Site Emergency Preparedness now reports to the Vice President and Site Manager, Nuclear Generation Site who is the most senior management level at the site. Therefore, approved changes to the Site Emergency Plan are transmitted to the NSG Supervisor only.

The responsibility for approval of changes to the Site Emergency Plan has been shifted from the Station Manager to the Vice President and Site Manager, Nuclear Generation Site. The Manager, Site Emergency Preparedness has primary responsibility for the Site Emergency Plan implementing procedures. This change correctly reflects the responsibilities within the existing organization.

Next "Supervisor" is added after "NSG." This change reflects the position title instead of the organization title.

- c. To define the preparation and approval process for implementing procedures, the phrase "; implementing Procedures shall be prepared and approved in accordance with Specification 6.8" is added as the last sentence of the paragraph. This change makes the units consistent.

26 TS Section 6.5.2.8

The changes are:

- a. In the second line of the paragraph, "uncontrolled or" is inserted between "every" and "unplanned." This change makes the units consistent.
- b. In the fifth line, "Manager of Nuclear Operations" is changed to "Vice President and Site Manager, Nuclear Generation Site;". This change reflects the correct position title.

Also, "to the Station Manager;" is added. This change is similar to that requested for Unit 1 and was approved by the NRC as documented in Reference 2.

- c. In the sixth line, "Supervisor" is added after "NSG." This change reflects the position title.

27 TS Section 6.5.2.9

The changes are:

- a. In the second line of the paragraph, "and may designate the approval" is added after "individual/organization." This change makes the units consistent.
- b. In the fourth line, "Documentation of these activities shall be provided to the Vice President and Site Manager, Nuclear Generation Site; to the Station Manager; and to the NSG Supervisor." This change is similar to that requested for Unit 1 and was approved by the NRC as documented in Reference 2.

28 TS Section 6.5.2.10

- a. In the first sentence of the paragraph, "Reports documenting" is deleted and replaced with "Documentation of." This change is editorial and makes the units consistent.

Next, "in accordance with Specification 6.10" is added after "shall be maintained." This provides a reference to clarify how long the documentation for Specifications 6.5.2.1 through 6.5.2.9 are maintained.

- b. The last sentence "Copies shall be provided to the Manager of Nuclear Operations and the Nuclear Safety Group" is deleted. The requirements for documentation are now described in each of Sections 6.5.2.1 through 6.5.2.9. Therefore, this last sentence is no longer required. This change makes the units consistent.

29 TS Section 6.5.3.2

The changes are:

- a. "The" is added to start the first sentence of the paragraph. This change makes the units consistent.

For Unit 2 "six" is changed to "6" in the second sentence and "five" is changed to "5" in the third sentence. These changes are editorial and make the units consistent.

- b. In the first sentence of the second paragraph, "6.5.2.1" is changed to "6.5.3.1." TS 6.5.3.1, not TS 6.5.2.1, describes the areas for

which NSG is responsible to provide reviews. This change is editorial.

30 TS Section 6.5.3.4

The changes are:

- a. Subsection 6.5.3.4.a - In the third line of the paragraph, "provision" is made plural to read "provisions." This change is editorial and makes the units consistent.
- b. Subsection 6.5.3.4.g - "Events requiring 24 hour written notification to the Commission" is deleted and replaced with "All REPORTABLE EVENTS." This change incorporates the guidance provided in Generic Letter 83-43 and makes the units consistent.

This change was made to Unit 1 and was accepted by the NRC as documented in Reference 1.

- c. Subsection 6.5.3.4.i - "meetings" before "minutes" is made singular to "meeting." This change is editorial.

31 TS Section 6.5.3.5

The changes are:

- a. Subsection 6.5.3.5.d - In the first line of the paragraph, "Operational" before "Quality Assurance Program" is deleted. This change reflects the correct title for the SCE Quality Assurance Program. This change makes the units consistent.
- b. Subsection 6.5.3.5.e - In the second line of the paragraph, "Supervisor" is added after "Nuclear Safety Group." This change reflects the correct position title.

"Manager of Nuclear Operations" is replaced with "the Vice President and Site Manager, Nuclear Generation Site." This change reflects the correct position title and makes the units consistent.
- c. Subsection 6.5.3.5.h - Beginning in the second line of the paragraph, "an outside qualified" is changed to "a qualified outside," and "3 years" is changed to "36 months." These editorial changes make the units consistent.

32 TS Section 6.5.3.7

The changes are:

In the second line of the paragraph, "Station Manager" is replaced with "Vice President and Site Manager, Nuclear Generation Site." This change makes the units consistent.

33 TS Sections 6.6, 6.6.1, and Subsection 6.6.1.b

The changes are:

- a. Section 6.6 - "OCCURRENCE" is replaced with "EVENT."
- b. Section 6.6.1 - "OCCURRENCES" is changed to "EVENTS."

The changes above are consistent with the guidance provided in Generic Letter 83-43 and make the units consistent. These changes were made to Unit 1 and were accepted by the NRC as documented in Reference 1.

- c. Subsection 6.6.1.a - In the first line of the paragraph, "and/or" is changed to "and." This change is editorial and makes the units consistent.

In the second line "Specification 6.9" is changed to "Section 50.73, 10 CFR Part 50, and." This change is consistent with the guidance provided in Generic Letter 83-43 and makes the units consistent. This change was made to Unit 1 and was accepted by the NRC as documented in Reference 1.

- d. Subsection 6.6.1.b - In the first line of the paragraph, "OCCURRENCE requiring 24 hour written notification to the Commission" is replaced with "EVENT." This change is consistent with the guidance provided in Generic Letter 83-43 and makes the units consistent. This change was made to Unit 1 and was accepted by the NRC as documented in Reference 1.

In the second line, "the results of this review shall be" is added before "submitted." This change makes the units consistent. In the third line, "to the Vice President and Site Manager, Nuclear Generation Site and" is added after "submitted." This change reflects a high level of management involvement in nuclear activity oversight and makes the units consistent.

In the fourth line "Supervisor" is added after "NSG." This change reflects the correct position title. Next "and the Manager of Nuclear Operations" is deleted because the position no longer exists.

34 TS Subsection 6.7.1.a

The changes are:

In the second sentence of the paragraph, "Manager of Nuclear Operations" is replaced with "Vice President and Site Manager, Nuclear Generation Site." This change makes the units consistent.

"Chairman" is replaced with "Supervisor." This change reflects the correct position title.

35 TS Subsection 6.7.1.c

The changes are:

- a. In the second line of the paragraph, "Manager of Nuclear Operations" is deleted and replaced with "Vice President and Site Manager, Nuclear Generation Site." This change reflects the correct position title.
- b. In the third line "Supervisor" is added after "NSG." This change reflect the correct position title.

36 TS Section 6.8

The changes are:

- a. Subsection 6.8.1.g - The footnote symbol "*" after "implementation" and the corresponding footnote "* See Specification 6.13.1" is deleted.

The footnote referencing the associated TS is inconsistent with the format used throughout Units 2 and 3 TS 6.8.1 (e.g., "6.8.1.d. Security Plan," "6.8.1.e. Emergency Plan," and "6.8.1.h Offsite Dose Calculation Manual," etc. are not footnoted). These changes make the units consistent.

- b. Subsection 6.8.1.i

In the second line of the paragraph, "Regulatory Guide 4.15 Rev. 1," is changed to "Regulatory Guide 4.15, Revision 1,". This change is editorial and makes the units consistent.

37 TS Section 6.8.2

The changes are:

- a. Beginning in the second line of the paragraph, "the Vice President and Site Manager, Nuclear Generation Site or by;" is added after "approved by." This change makes the units consistent.
- b. After "Station Manager; or by," "(1) the Deputy Station Manager, (2) the Manager Operations, (3) the Manager, Maintenance, (4) the Manager, Technical, or (5) the Manager, Health Physics" is replaced with "the responsible Nuclear Division Manager; or by their designees." Nuclear Division Managers include division managers reporting to the Station Manager, the Vice President and Site Manager, and the Senior Vice President.

This change allows nuclear division managers or designees to approve procedures and changes to procedures in their specific area and unit of responsibility where they have been previously

designated by the Vice President and Site Manager, Nuclear Generation Site.

- c. In line six of the paragraph, "Station Manager;" is changed to "Vice President and Site Manager, Nuclear Generation Site." This change reflects the correct position title.

38 TS Section 6.8.3

The changes are:

- a. Subsection 6.8.3.b - in the first line of the paragraph, "plant" is replaced with "nuclear division." Also, "exercising responsibility in the specific area and unit or units addressed by the change, and" is added after "staff."

These changes allow nuclear division management staff, that do not report directly to the Station Manager or Vice President and Site Manager, Nuclear Generation Site to approve temporary changes to procedures in their specific area and unit or units of responsibility. At least one of the two individuals approving the temporary change holds a valid (active or inactive) Senior Reactor Operator's (SRO's) license on the unit affected. SROs with active licenses are those individuals who are fully licensed on Units 2 and 3 and are members of the Minimum Shift Crew Composition in TS Table 6.2-1. SROs with inactive licenses are those individuals who are fully licensed on Units 2 and 3 and attend 100% requalification training but are not members of the Minimum Shift Crew Composition.

In the last line of the paragraph, "License" is changed to lower case and reads "license." This change is editorial.

- b. Subsection 6.8.3.c

"Station Manager; or by (1) the Deputy Station Manager, (2) the Manager, Operations, (3) the Manager, Maintenance, (4) the Manager, Technical, or (5) the Manager, Health Physics" is replaced with "responsible nuclear division management staff." Then "previously" before, and "by the Station Manager" after "designated," are deleted and "in accordance with 6.8.2 above" is added before "within 14 days."

The existing TS 6.8.3.c lists 5 nuclear division managers reporting to the Station Manager who are authorized to review and approved temporary changes to procedures. The specific list will be replaced with "responsible nuclear division management staff." These change allows other nuclear division management staff that do not report directly to the Station Manager or the Vice President and Site Manager, Nuclear Generation Site, e.g., Nuclear Construction Manager, Nuclear Engineering Design Organization Manager, Manager of Nuclear Regulatory Affairs, etc., to approve

procedures and changes to procedures in their specific area and unit of responsibility.

Next, the TS references Specification 6.8.2 for the individuals responsible for the reviews.

39 TS Section 6.8.4

The changes are:

- a. Subsection 6.8.4.b - For Unit 2 only, the "*" following "program" in lines 1 and 3 and the corresponding footnote "** Not required to be implemented until September 1, 1983" are deleted. This change is appropriate because the In-Plant Radiation Monitoring Program has been implemented. These changes make the units consistent.
- b. Subsections 6.8.4.c.(i) and 6.8.4.c(ii) - in these TSs, "variables" is changed to "parameters." This change makes the units consistent.
- c. Subsection 6.8.4.c.(iii) - The text "including monitoring the discharge of condensate pumps for evidence of condenser in-leakage" is deleted because the program describes the appropriate indication of sampling points. This change makes the units consistent.
- d. Subsection 6.8.4.d - In the first and second sentences the "*" on "program" is deleted and the footnote "** Not required to be implemented until September 1, 1983" is deleted. Because the Post Accident Sampling Program has been implemented, this footnote is no longer appropriate. This change makes the units consistent.

The text for this TS is revised for format consistency as shown:

"A program which will ensure... containment atmosphere samples under accident conditions. The program shall include:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis, and
- (iii) Provisions for maintenance of sampling and analysis equipment."

This change is editorial and makes the units consistent.

40 TS Section 6.9

The changes are:

- a. In the sub-title, "AND REPORTABLE OCCURRENCES" is deleted. The revised sub-title now reads "ROUTINE REPORTS." This change is

consistent with the guidance in Generic Letter 83-43. This change was made to Unit 1 and was accepted by the NRC as documented in Reference 1. This change makes the units consistent.

- b. Section 6.9.1 - Beginning in the second line of the paragraph, "U. S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C. 20555 with a copy to the" is added. In the fourth line, "NRC" before "Regional Administrator" is deleted and "of the Regional Office of the NRC" is added after "Regional Administrator".

These changes reflect the current NRC addressee for routine reports under Section 6.9.1.

- c. Subsection 6.9.1.4 - The last sentence, "The initial report shall be submitted prior to March 1 of the year following initial criticality" is deleted. This change is made because both Units 2 and 3 have long surpassed initial criticality. Therefore, the requirement is no longer appropriate.
- d. Subsection 6.9.1.5 - In the second sentence of the second paragraph for both Units 2 and 3 TSSs, "the" is added before "limit." For the Unit 2 TS, "exceed" is changed to "exceeded." For both Units 2 and 3 TSSs, "the" is added after "less than." In the third sentence for the Unit 2 TS, "the" after "(5)" is capitalized to "The." These changes are editorial and make the units consistent.
- e. Subsection 6.9.1.8 - In the second sentence of the paragraph "and solid waste" is deleted. Next, a new third sentence is added which reads "The report shall also include a summary of the quantities of solid radioactive waste shipped from the unit directly to the disposal site and the quantities of solid radioactive waste shipped from the unit's intermediary processor to the disposal site."

Both industry goals and utility practices acknowledge the common practice of solid radioactive waste volume reduction. Offsite volume reduction is merely an extension of the utility's radioactive waste processing capabilities. The final volume shipped to a disposal site is reported in the Semiannual Radioactive Effluent Release Report (SRERR). One aspect of the unit's performance is evaluated on the volume of solid radioactive waste received by a disposal operator. Because solid radioactive waste is often reduced by a factor of 100, it is the quantity of solid radioactive waste after reduction by an intermediary processor that should be reported in the SRERR. This change ensures the SRERR reports the quantities of solid radioactive waste that are ultimately shipped to the disposal site.

- f. Subsection 6.9.1.10 - In the second line of the first paragraph, "pressurizer" is added before "safety valves." This change clarifies the valve challenges to be reported in the Monthly Operating Report. This change is consistent with the intent of the

Standard Technical Specifications.

- " In the third line of the same paragraph, "Director, Office of Resource Management," is deleted. "Attention: Document Control Desk," is added after "U. S. Nuclear Regulatory Commission." This change corrects the NRC addressee for the Monthly Operating Report.

The second paragraph of 6.9.1.10, which concerns the submittal with the Monthly Operating Report (MOR) of change(s) to the ODCM or major changes to the radioactive waste treatment systems, is deleted. The ODCM reporting duplicates TS 6.14 which requires ODCM change(s) to be submitted with or concurrent to the submittal of the Semiannual Radioactive Effluent Release Report. The radioactive waste treatment system reporting also duplicates ODCM Section 6.3, "Major Changes to Radioactive Waste Treatment Systems (Liquids and Gases)." The radioactive waste treatment system reporting was deleted from Section 6.0 TS by Amendment Nos. 83 and 73 for Units 2 and 3, respectively, and relocated to the administrative section of the ODCM as permitted by Generic Letter 89-01. This change makes the units consistent.

- g. Subsections 6.9.1.11, 6.9.1.12, and 6.9.1.13

These TS subsections "REPORTABLE OCCURRENCES, "PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP," and "THIRTY DAY WRITTEN REPORTS," respectively, are deleted.

These changes are consistent with the guidance provided in Generic Letter 83-43. These changes were made to the Unit 1 TS and were accepted by the NRC as documented in Reference 1.

- h. Section 6.9.2 - In the first line of the paragraph "reports" is capitalized and reads "Reports." This change is editorial.

"U. S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C. 20555, with a copy to the" is added after "to the." "NRC" before "Regional Administrator" is deleted and "of the Regional Office of the NRC," is added after "Regional Administrator." These changes correct the NRC addressee for Special Reports.

41 TS Section 6.10

The changes are:

- a. Subsection 6.10.1.c - "OCCURRENCES" after "REPORTABLE" is changed to "EVENTS." This change is consistent with the guidance provided in Generic Letter 83-43. This change was made to the Unit 1 TS and was accepted by the NRC as documented in Reference 1.

- b. Subsection 6.10.1.d - After "activities" replace ";" with ",". This change is editorial.
- c. Subsection 6.10.2.i - After "QA Manual" "not included in Specification 6.10.1" is added. This change ensures only records of activities required by the QA Manual that are not covered under 6.10.1 be retained for the duration pursuant to this specification.
- d. Subsection 6.10.2.k - "OSRC" is added before "meetings" and "of the OSRC" is deleted. Next, "the" before "NSG" is deleted and "reports" is added after "NSG." These changes make the units consistent.

42 TS Subsection 6.12.2

The changes are:

- a. In the first sentence of the paragraph, "Supervisor" is changed to "Superintendent." This change makes the units consistent.
- b. In the third sentence, "," is added after "posted" and "unless a health physics technician is in continuous attendance," is added before "a flashing light." The existing TS requires areas accessible to personnel where a major portion of the body could receive a 1,000 mrem dose in one hour and no enclosure for locking purposes exists and no enclosure can be reasonably constructed, to be roped off, conspicuously posted, and a flashing light activated as a warning device.

This change allows the use of flashing lights or the continuous attendance of a health physics technician to identify areas where dose rates are in excess of 1000 mrem/hour. A health physics technician would be in continuous attendance only when the greater than 1000 mrem/hr dose rates would be temporary or the flashing light would not be working. A similar change was requested for Unit 1 and was approved by the NRC on August 11, 1982 as Amendment No. 61. This change makes the units consistent.

43 TS Section 6.13

The changes are:

- a. Subsection 6.13.2.1 - In the first sentence, "6.10.2n." is changed to "6.10.2.n." This change is editorial.

A second sentence which reads "This documentation shall contain:" is added to the paragraph. This change is editorial.
- b. Subsection 6.13.2.1.b - At the end of the paragraph, "." is deleted and "; and" is added. This change is editorial and makes the units consistent.

- c. Subsection 6.13.2.2 - "acceptance" is changed to "approval." This change makes the units consistent.

Also, "by the Station Manager" is added after "6.5.2". This change was requested in Unit 1 as documented in Reference 2.

44 TS Section 6.14

The changes are:

- a. Subsection 6.14.2.1 - In the first sentence of the paragraph, "6.10.2n." is changed to "6.10.2.n." This change is editorial.

Next, a second sentence "This documentation shall contain:" is added to the paragraph. This change is editorial.

- b. Subsection 6.14.2.1.b - At the end of the paragraph, "." is deleted and replaced with "; and." This change is editorial and makes the units consistent.

- c. Subsection 6.14.2.2 - Change "acceptance" to "approval." This change makes the units consistent.

Also, add "by the Station Manager" after "6.5.2." This change was requested in Unit 1 as documented in Reference 2.

45 TS Section 6.15

For Unit 2, the existing "Intentionally Left Blank" page is removed from the TS.

For Unit 3, the section "6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS -- DELETED" is removed from the TS.

Section 6.15 was deleted previously by Amendment Nos. 83 and 73, and the proposed changes will help clean up Section 6.0.

CHANGES TO TS SECTION 7.0, "SPECIAL TEST PROGRAM"

TS Section 7.0 is deleted from the Unit 2 TSs because the natural circulation testing program was applicable only during the initial startup testing for Unit 2. There is no change in the Unit 3 TSs because Unit 3 does not have Section 7.0.

SAFETY ANALYSIS

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a 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 an accident previously evaluated?

Response: No

Changes to Unit 2 License Conditions 2.C.(19)a and 2.C.(19)c

The deletion of License Conditions 2.C.(19)a, "Shift Technical Advisor (I.A.1.1, SSER #1)," and 2.C.(19)c, "Independent Safety Engineering Group (I.B.1.2, SSER #1)," are administrative in nature and do not impact probabilities or consequences of an accident previously evaluated. These license conditions have been implemented and presently incorporated in TS Sections 6.2.3 and 6.2.4, respectively. Therefore, operation of facility in accordance with these proposed changes will not increase the probability or consequences of an accident previously evaluated.

Changes to License Condition 2.E

The changes to reflect the most recent submittal dates for the Physical Security Plan, Security Force Training and Qualification Plan, and Safeguards Contingency Plan are administrative and do not impact probabilities or consequences of an accident previously evaluated. Therefore, operation of the facility in accordance with these proposed changes will not increase the probability or consequences of an accident previously evaluated.

Changes to TS Section 1.26 and TS Index

Changes to Section 1.26 and TS indices are administrative in nature and do not impact probabilities or consequences of an accident previously evaluated. Therefore, operation of facility in accordance with these proposed changes will not increase the probability or consequences of an accident previously evaluated.

Organizational Changes

The proposed changes 1) increase executive level attention and oversight of all nuclear activities, and 2) clarify personnel responsibilities as a result of the organization change within Southern California Edison's nuclear organization. These changes are administrative and will not impact the probabilities or consequences of an accident previously evaluated. Therefore, operation of facility in accordance with these proposed changes will not increase the probability or consequences of an accident previously evaluated.

Changes to Reporting Requirements

The changes in reporting requirements are consistent with the guidance provided in GL 83-43. The changes are administrative in nature and will not impact the probabilities or consequences of an accident previously evaluated. Therefore, operation of facility in accordance with these

proposed changes will not increase the probability or consequences of an accident previously evaluated.

The change to TS 6.9.1.8 does not impact the probabilities or consequences of an accident previously evaluated. The change is administrative in nature because the program for reporting radioactive waste would continue to be controlled by 10 CFR 50 Appendix I. Therefore, operation of facility in accordance with the proposed change will not increase the probability or consequences of an accident previously evaluated.

Other Changes Including Editorial Changes

These changes are administrative and will not impact the probabilities or consequences of an accident previously evaluated. Therefore, operation of facility in accordance with these proposed changes will not increase the probability or consequences of an accident previously evaluated.

Change to Section 7.0

The change to delete Section 7.0 from the Unit 2 TSs is appropriate because this section is no longer applicable. This change is administrative and will not impact the probabilities or consequences of an accident previously evaluated. Therefore, operation of facility in accordance with these proposed changes will not increase the probability or consequences of an accident previously evaluated.

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 accident previously evaluated?

Response: No

Changes to Unit 2 License Conditions 2.C.(19)a and 2.C.(19)c

The deletion of these two license conditions are administrative in nature and do not impact any equipment, system, or plant configuration. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Changes to License Condition 2.E

The proposed changes are administrative in nature and do not impact any equipment, systems, or plant configuration. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Changes to TS Section 1.26 and TS Index

The proposed changes are administrative in nature and do not impact any equipment, systems, or plant configuration. Therefore, the proposed

changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Organizational Changes

The proposed organizational changes are administrative in nature and do not impact any equipment, systems, or plant configuration. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Changes to Reporting Requirements

The proposed changes concerning the TS reporting requirements are administrative in nature and do not impact any equipment, systems, or plant configuration. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The change to TS 6.9.1.8 does not impact any equipment, systems, or plant configuration. The change is administrative in nature and the program for reporting radioactive waste would continue to take credit for the final volume of radioactive waste shipped to the disposal site. Therefore, the proposed change will not create the probability of a new or different kind of accident previously evaluated.

Other Changes Including Editorial Changes

The editorial changes are administrative in nature and do not impact any equipment, systems, or plant configuration. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Changes to Section 7.0

The deletion of Section 7.0 from the Unit 2 TSs is administrative in nature and do not impact any equipment, systems, or plant configuration. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

Changes to Unit 2 License Conditions 2.C.(19)a and 2.C.(19)c

The proposed changes are administrative in nature and will not impact any design basis events or margin of safety associated with these events. Therefore, operation of the facility with this proposed changes will not involve a significant reduction in a margin of safety.

Changes to License Condition 2.E

The proposed changes are administrative in nature and will not impact any design basis events or the margin of safety associated with these events. Therefore, operation of the facility with this proposed changes will not involve a significant reduction in a margin of safety.

Changes to TS Section 1.26 and TS Index

The proposed Section 1.26 and TS indices changes are administrative in nature and will not impact any design basis events or the margin of safety associated with these events. Therefore, operation of the facility with this proposed changes will not involve a significant reduction in a margin of safety.

Organizational Changes

The proposed organizational changes are administrative in nature and will not impact any design basis events or the margin of safety associated with these events. Therefore, operation of the facility with this proposed changes will not involve a significant reduction in a margin of safety.

Changes to Reporting Requirement

The proposed changes to the Section 6.0 reporting requirements are administrative in nature and will not impact any design basis events or the margin of safety associated with these events. Therefore, operation of the facility with this proposed changes will not involve a significant reduction in a margin of safety.

The change to TS 6.9.1.8 would only ensure the reporting of the final solid radioactive waste shipped to the disposal site is appropriate. The change is administrative in nature and will not impact any design basis events or margin of safety associated with these events. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

Other Changes Including Editorial Changes

The editorial changes are administrative in nature and will not impact any design basis events or the margin of safety associated with these events. Therefore, operation of the facility with this proposed changes will not involve a significant reduction in a margin of safety.

Changes to Section 7.0

The deletion of Section 7.0 from the Unit 2 TSs is administrative in nature and will not impact any design basis events or the margin of safety associated with these events. Therefore, operation of the facility with this proposed changes will not involve 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 10 CFR 50.92; 2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and 3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.