



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 137 TO FACILITY OPERATING LICENSE NO. NPF-10
AND AMENDMENT NO. 129 TO FACILITY OPERATING LICENSE NO. NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By application dated January 4, 1996, Southern California Edison Company (SCE or the licensee) requested changes to Facility Operating License Nos. NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, respectively. The proposed changes would delete License Condition 2.C(26) for SONGS Unit 2 and License Condition 2.C(27) for SONGS 3. These license conditions require that SCE implement and maintain a plan for scheduling all capital modifications based on an NRC approved Integrated Implementation Schedule Program Plan.

2.0 DISCUSSION

On May 15, 1989, License Amendment Nos. 72 and 60 established an Integrated Implementation Schedule (IIS) Program by License Conditions 2.C(26) and 2.C(27) 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 SCE to update its schedules of capital modifications on a semi-annual basis.

The IIS methodology utilizes the Westinghouse Analytical Ranking Process (WARP) to determine the relative potential safety significance of each licensee 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 the licensee and which would result in either, (a) plant modifications, (b) procedure revisions, or (c) changes in facility staffing requirements; or items perceived by the licensee 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

Licensee 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 the licensee.

The IIS program is based on a priority determination to assist in maximizing the benefit derived from 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 the licensee's discretion.

The IIS program requires that the licensee 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. The licensee is required to update Schedules A, B, and C semi-annually and submit the revised schedules to the NRC. In addition to updating schedules, the licensee is required to:

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

The licensee states that regulatory project allocations for refueling outages have been steadily decreasing and are currently under 40 percent 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 SCE 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 betterment projects which have had their worth determined by SCE and are under its control for scheduling purposes.

3.0 EVALUATION

The staff's evaluation of the licensee's request focused on the regulatory need for continuing the IIS program for the SONGS units, and considered the final policy statement on integrated schedules.

The requirements of License Condition 2.C(26) for SONGS Unit 2 and License Condition 2.C(27) for SONGS 3 are redundant to other mechanisms which are in place to respond, track, and implement regulatory projects. Mechanisms for responding to NRC Rules and Orders, Notices of Violation, Generic Letters, Licensee Event Reports, etc., are adequate to ensure proper control over the scheduling and implementation of new regulatory required projects generated from these documents. These mechanisms meet the intent of implementing capital modifications at SONGS 2 and 3 in a stable and controlled manner. 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.

The IIS effort is a voluntary collaboration between a licensee and the NRC designed to permit more effective use of licensee resources to implement plant changes and NRC resources to review them. The volunteer nature of this program, and the ability of licensees to withdraw from the program, is

detailed in the final policy statement on integrated schedules, published in the Federal Register on September 23, 1992 (57 FR 43886).

This policy statement describes the policy the Commission intends to use to promote voluntary implementation of licensee integrated schedules for regulatory requirements and other activities at nuclear power plants. The policy statement specifically states that licensees may withdraw from the program upon notifying the NRC. For plants that have committed to the IIS program in a license condition, specific NRC approval is required to delete this commitment.

Based on the above discussion and evaluation, the staff finds acceptable the licensee's proposal to delete License Condition 2.C(26) for SONGS Unit 2 and License Condition 2.C(27) for SONGS 3.

4.0 STATE CONSULTATION

In accordance with the regulations of the Commission, the California State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the regulations of the Commission, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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