

10 CFR 50.59  
10 CFR 50.71  
10 CFR 72.48

June 3, 2021

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Subject: **Docket Nos. 50-206, 50-361, 50-362, and 72-41  
Facility Change Report, Summary Report of Commitment Changes  
San Onofre Nuclear Generating Station (SONGS) Units 1, 2, 3, and the  
Independent Spent Fuel Storage Installation**

Dear Sir or Madam:

The attached enclosures contain the Facility Change Report required by 10 CFR 50.59(d)(2) for SONGS Units 1, 2 and 3, and by 10 CFR 72.48(d)(2) for the SONGS ISFSI during the reporting period from April 2, 2019 through April 2, 2021. There was one 10 CFR 50.59 evaluation performed for SONGS Units 1, 2 and 3 during this period which is summarized in Attachment 1. Brief descriptions of 10 CFR 72.48 evaluations performed for the SONGS ISFSI are included in Attachment 2. Complete change documentation for SONGS evaluations performed in accordance with 10 CFR 50.59 and 10 CFR 72.48 is available onsite.

This letter also provides a list of commitments that were determined to be no longer applicable to SONGS following the guidance of Nuclear Energy Institute (NEI) 99-04, "Guidance for Managing NRC Commitment Changes," Revision 0, for the reporting period of April 2, 2019 through April 2, 2021, (Attachment 3). Those commitments that remain applicable to SONGS are provided in Attachment 4.

On August 10, 2020, SONGS implemented License Amendments 237 and 230 to the Units 2 and 3 Technical Specifications (TS) to reflect the permanent removal of spent fuel from the Spent Fuel Pools. These amendments deleted TS 5.4.4 which allowed for changes to the TS Bases to be made without prior NRC approval (Unit 1 TS was previously deleted). For the period prior to the deletion of the SONGS Units 2 and 3 TS, (i.e., April 2, 2019 through August 10, 2020) there were no changes made to the TS Bases. Going forward, the reporting of TS Bases changes will not be part of this report since the SONGS Bases Control Program and associated requirements have been eliminated.

There are no new commitments in this letter or the enclosures.

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If you have any questions, please contact me at (949) 368-7024.

Sincerely,

 for  
A. Bates

Attachments:

1. SONGS Units 2 and 3 10 CFR 50.59 Evaluation Summary
2. SONGS ISFSI 10 CFR 72.48 Evaluation Summaries
3. SONGS Units 1, 2, and 3 Commitments No Longer Applicable to SONGS
4. SONGS Units 1, 2, and 3 Commitments Applicable to SONGS

cc: S. A. Morris, Regional Administrator, NRC Region IV  
A. M. Snyder, NRC Project Manager, SONGS Units 1, 2 and 3

ATTACHMENT 1

SONGS UNITS 2 AND 3  
10 CRF 50.59 EVALUATION SUMMARY  
FOR THE PERIOD  
APRIL 2, 2019 TO APRIL 2, 2021

## **ATTACHMENT 1 – SONGS 10 CFR 50.59 EVALUATION SUMMARY**

### **Change Number and Title:**

SDS-1-C-PV-1248 Rev.0, Unit 1 RPV Rigging and Handling

### **Evaluation Summary:**

The proposed activity evaluated with this change was the removal of the Unit 1 Reactor Pressure Vessel (RPV) package from its onsite storage location at the North Industrial Area (NIA) and the rigging and lifting of the waste package onto a transportation vehicle within the Owner Controlled Area (OCA) for subsequent transport to a waste disposal facility. The postulated scenario that was the subject of the evaluation was a seismic event occurring at the time the RPV was lifted that could have resulted in the RPV package sliding off the climbing jacks or the header beam sliding off its support, causing the load to drop approximately six feet. Though unlikely, this postulated scenario was evaluated with the respect to the design function of the Unit 1 RPV package to provide shielding against the contained radiation source, the RPV. Based on the weight, postulated height, and the robustness of the Unit 1 RPV package, it was conservatively projected that the Unit 1 RPV package outer encasement could experience limited damage, but the reactor vessel would remain undamaged. It was concluded that should the outer encasement be breached, the resulting dose to the atmosphere from the exposed metal RPV would be inconsequential relative to the limits of 10 CFR 100. The evaluation of the proposed change was also used to modify statements in the Unit 1 DSAR that referenced the onsite storage location of the vessel.

ATTACHMENT 2

SONGS ISFSI  
10 CRF 72.48 EVALUATION SUMMARIES  
FOR THE PERIOD  
APRIL 2, 2019 TO APRIL 2, 2021

## **ATTACHMENT 2 – SONGS 10 CFR 72.48 EVALUTATION SUMMARIES**

### **Change Number and Title:**

0718-10512-3, Review of the Analyses Supporting a Cask Tip-over Event

### **Evaluation Summary:**

The SONGS Units 2 and 3 UFSAR historically addressed a cask drop in the Fuel Handling Building cask loading pool. With the addition of a single-failure proof crane, the event was better characterized as a tip-over and fall rather than a dropped load. A cask tip-over event was postulated to occur from the upper shelf of the Cask Loading Area (CLA), caused by an earthquake during transition of the cask from the lift yoke extension when the single failure proof cask handling crane was disconnected. Although this practice was discontinued in the fuel transfer campaign, a review of the licensing basis was warranted.

The postulated tip-over event addressed three specific impacts to the design basis function: potential dose consequences, impact to the CLA wall, floor and associated liner, and the reaction force loading on the canister. The event and possible impacts were found to be acceptable. NRC Regional Inspectors have reviewed this evaluation and their findings were discussed in Inspection Report 2018-006/2018/002 (ADAMS Accession No. ML19190A217).

### **Change Number and Title:**

0618-48522-5, Revised Minimum Thread Engagement for Mating Device Bolted Joints

### **Evaluation Summary:**

The spent fuel transport device, HI-TRAC, to mating device flange joint bolting called for a 2.5" thread engagement to provide an adequate stack-up during various design basis events. However, two of the installed bolt holes were stripped on the mating device when attempts were made to level the HI-TRAC with the mating device attached. This resulted in a reduced thread engagement to 1.75" for that particular joint. A site-specific analysis was performed to demonstrate that the reduced thread engagement provided an adequate factor of safety for the joint's structural adequacy and capability. The analysis was used to support a "use as is" disposition of the non-conforming condition. This evaluation was a revision to a similar evaluation reported in the previous SONGS Facility Change Report.

## ATTACHMENT 2 – SONGS 10 CFR 72.48 EVALUTATION SUMMARIES

### Change Number and Title:

0719-48750 - Compliance with Technical Specifications When Mating Device Installed

### Evaluation Summary:

Southern California Edison elected to apply Holtec HI-STORM UMAX Certificate of Compliance Technical Specification (TS) 3.1.2 to the multi-purpose canister (MPC) mating device and adapter as a means to ensure an equivalent implementation of the thermal-hydraulic analysis supporting the cooling design function. Doing so required changes to both the UMAX 72.212 report and the relevant site procedures.

Though the TS was intended to apply to a completed spent fuel system canister heat removal system (e.g., when the lid and exhaust vent were installed on the vertically ventilated module), the content of the TS stated that the provisions of the specification must be satisfied during storage operations (a TS defined term). The TS was recognized to be deficient and changes were with the NRC for review as part of the Amendment 4 request to the TS. Pending approval, it was deemed appropriate to apply the TS to the mating device and adapter configuration. The evaluation reviewed the increased temperature impact imposed by the TS conditions on the configuration and was determined that the process changes could be made without additional NRC notification.

ATTACHMENT 3

LIST OF COMMITMENTS NO LONGER APPLICABLE TO  
SAN ONOFRE NUCLEAR GENERATING STATION  
AS OF APRIL 2, 2021



### ATTACHMENT 3 - LIST OF COMMITMENTS NO LONGER APPLICABLE TO SONGS

Commitment Number	Verbatim Commitment to NRC	Commitment Source
1991-09-001	We are currently completing the procedures to implement the vendor interface program. These procedures will be completed by October 31, 1991.	SCE to NRC LTR 09/30/1991
2004-12-003	SCE is making a regulatory commitment to provide information to the NRC annually to support the apportionment of station dose for SONGS U1, U2 & U3 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).	SCE to NRC LTR 12/27/2004
2004-12-004	Following approval of this license amendment request (PCN 555), future revisions to UFSAR Chapter 15 design basis accident control room and offsite radiological consequence analyses will be performed using AST methodology.	SCE to NRC LTR 12/27/2004
2007-01-003	SCE will include the SFP external makeup strategy and SFP external spray strategy in plant procedures as described in Tables A.2-1 through A.2-6 of Enclosure 1 [of the source document].	SCE to NRC LTR 01/10/2007
2007-01-004	SCE will include the command and control enhancement strategies in plant procedures as described in Table A.3-1 of Enclosure 1 [of the source document].	SCE to NRC LTR 01/10/2007
2007-01-005	SCE will implement the PWR mitigation strategies in plant procedures as described in Tables A.4-1 through A.4-7 of Enclosure 1 [of the source document].	SCE to NRC LTR 01/10/2007
2007-01-006	SCE will list the viable site specific reactor/containment strategies in appropriate procedures that could be used by emergency response organization or plant personnel given in Table A.6-1 of Enclosure 1. Revised commitment: SCE will include viable site specific strategies #33 and #34 for alternate fire water sources given in Table A.2-4 of Enclosure 1 [of the source document] as site-specific SFP mitigation strategies in appropriate plant procedures that could be used by emergency response organization or plant personnel.	SCE to NRC LTR 01/10/2007
2007-01-007	SCE will conduct training on the mitigation strategy procedures/guidelines. Training on the procedures will be commensurate with the level of training provided for Severe Accident Management Guidelines (SAMGs).	SCE to NRC LTR 01/10/2007
2007-07-001	SCE will apply a 6.6% reduction to the CECOR computer code determination of fuel assembly burnup for all fuel assemblies prior to determination of the allowable storage location per the proposed TS 4.3.1 and LCS 4.0.100.	SCE to NRC LTR RAI 07/27/2007

**ATTACHMENT 3 - LIST OF COMMITMENTS NO LONGER APPLICABLE TO SONGS**

Commitment Number	Verbatim Commitment to NRC	Commitment Source
2013-06-001	Revise procedures to incorporate multi-unit, multi-source dose assessment by manually summing the individual dose assessment results for each unit.	SCE to NRC LTR 6/28/13
2013-06-002	Complete ERO training regarding multi-unit, multi-source dose assessment by manually summing the individual dose assessment results for each unit.	SCE to NRC LTR 6/28/13
2014-01-001	Report on changes to Mitigating Strategies. Update Commitment Change Report dated 1/2/14.	SCE to NRC LTR 1/2/14
2014-09-001	Procedures will be revised to ensure that walk-downs and patrols [of SFP systems] are periodically (no less than once a shift) performed.	SCE to NRC LTR 9/9/2014
2015-02-001	SCE will ensure licensee-controlled documents are in place to require the continuing performance of the Hazardous Cargo Traffic Report. The report will include hazardous cargo traffic on Interstate 5 and the adjacent railway line and be submitted to the NRC regional administrator every three years. [Later revised to every five years.]	SCE to NRC LTR 2/23/2015

ATTACHMENT 4

LIST OF COMMITMENTS APPLICABLE TO  
SAN ONOFRE NUCLEAR GENERATING STATION  
AS OF APRIL 2, 2021

**ATTACHMENT 4 – LIST OF COMMITMENTS APPLICABLE TO SONGS**

<b>Commitment Number</b>	<b>Status</b>	<b>Verbatim Commitment to NRC</b>	<b>Commitment Source</b>
2010-08-009	Fulfilled	Modify the ECP procedure SO123-XXIV-10.1, Att. 12), to provide the engineer responsible for installing the design change with guidance as to when SPI owner must be notified of a field change.	SCE to NRC LTR 8/30/10
2007-09-001	Fulfilled	For all heavy load lifts, ensure commitments to safe load paths, load handling procedures, training of crane operators, use of special lifting devices, use of slings, crane design, and inspection, testing, and maintenance of the crane are adequately implemented and reflected in plant procedures.	NEI 08-05
2006-05-006	Fulfilled	Make informal notification as soon as practicable to appropriate State/Local officials, with follow-up notification to the NRC, as appropriate, regarding significant onsite leaks/spills into groundwater (see Item 2.1) and onsite or offsite water sample results exceeding the criteria in the REMP (see Item 2.2).	SCE to NRC LTR 8/1/2006 NEI 07-07
2006-05-005	Fulfilled	Submit a 30-day report to the NRC for any water sample result for onsite groundwater that is or may be used as a source of drinking water that exceeds the criteria in the licensee's existing REMP for 30-day reporting of offsite water sample results. Copies of 30-day reports for both onsite and offsite water samples will also be provided to the appropriate State agency;	SCE to NRC LTR 8/1/2006 NEI 07-07
2006-05-004	Fulfilled	Document all onsite groundwater sample results and a description of any significant onsite leaks/spills into groundwater for each calendar year in the Annual REMP Report, beginning with the report covering the calendar year 2006.	SCE to NRC LTR 8/1/2006 NEI 07-07
2006-05-003	Fulfilled	Put in place a company/site-specific action plan(s) to help assure timely detection and effective response to situations involving inadvertent radiological releases in groundwater to prevent migration of licensed radioactive material offsite and quantify impacts on decommissioning.	SCE to NRC LTR 8/1/2006 NEI 07-07

**ATTACHMENT 4 – LIST OF COMMITMENTS APPLICABLE TO SONGS**

1998-12-001	Fulfilled	SCE will decontaminate and dismantle the facilities and structures that will remain to support spent fuel and Greater Than Class C (GTCC) waste storage in the ISFSI after the spent fuel and GTCC wastes are removed from the site.	SCE to NRC LTR 12/15/1998
1997-11-002	Fulfilled	Revise its 10 CFR 50.59 program to be consistent with NEI 96-07, Revision 1. These requirements are incorporated in SO123-XV-44 Rev 19. [Revised: 50.59 program is consistent with NEI 96-04, 72.48 program is consistent with NEI 12-04]	SCE to NRC LTR 11/17/1997
1990-03-006	Fulfilled	The consolidated NRC open item and commitment tracking program will be implemented by June 1, 1990. Review of NRC commitments and tracking program documentation will be completed by August 1, 1990.	SCE to NRC LTR 03/19/1990
1990-03-003	Fulfilled	SCE will develop a severe weather response procedure in accordance with NUMARC 87-00.	SCE to NRC LTR 03/12/1990