



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONALSM Company

Dwight E. Nunn
Vice President

January 11, 2001

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Application for Technical Specification Improvement to
Eliminate Requirements for Post Accident Systems
Using the Consolidated Line Item Improvement Process
San Onofre Nuclear Generating Station Units 2 and 3

In accordance with the provisions of 10 CFR 50.90, Southern California Edison is submitting a request for an amendment to the technical specifications (TS) for San Onofre Nuclear Generating Station Units 2 and 3.

Enclosed are Amendment Application Number 205 to Facility Operating License NPF - 10 and Amendment Application Number 190 to Facility Operating License NPF - 15, for the San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The Amendment Applications consist of Proposed Technical Specification Change Number (PCN) - 523 which is provided in the Enclosure to this letter.

The proposed amendments would delete Technical Specification (TS) 5.5.2.2, "Post Accident Sampling Program" and thereby eliminate the requirements to have and maintain the PASS at San Onofre. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the Federal Register on October 31, 2000 as part of the consolidated line item improvement process (CLIIP). As discussed in the notice of availability for this TS improvement, this request also revises TS 5.5.2.8, "Primary Coolant Sources Outside Containment Program," to reflect the elimination of PASS. Additionally this request would delete License Conditions, 2.C(19)i for Unit 2 and 2.C(17)d for Unit 3, "Post-Accident Sampling System (NUREG-0737 Item II.B.3)."

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January 11, 2001

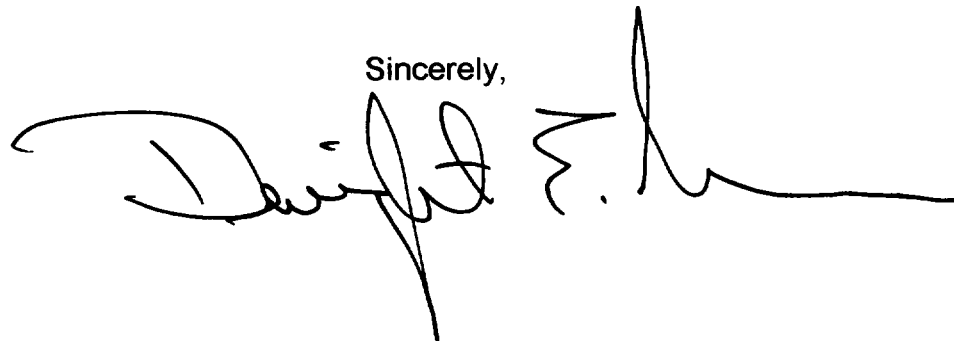
Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verification. Attachment 2 provides the existing TS pages marked-up to show the proposed changes. Attachment 3 provides revised clean technical specification pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal.

Southern California Edison requests approval of the proposed License Amendment by July 15, 2001, with the amendment being implemented within 60 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated California Official.

If you should have any questions regarding this submittal, please contact Mr. Jack L. Rainsberry (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. L. Rainsberry", written in a cursive style.

Attachment: 1. Description and Assessment
2. Proposed Technical Specification Changes
3. Revised Technical Specification Pages
4. Regulatory Commitments

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
L. Raghavan, NRC project Manager, San Onofre Units 2 & 3
S. Y. Hsu, Department of Health Services, Radiologic Health Branch

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-361
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 2 of the San Onofre Nuclear)	No. 205
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 205. This Amendment Application consists of Proposed Change Number 523 (PCN 523) to Facility Operating License No. NPF-10.

PCN 523 is a request to delete Technical Specification 5.5.2.2, "Post Accident Sampling Program" and revise 5.5.2.8, "Primary Coolant Sources Outside Containment Program," using the Consolidated Line Item Improvement Process. This request would also delete License Condition 2.C(19)i, "Post-Accident Sampling System (NUREG-0737 Item II.B.3)."

Subscribed on this 11 day of Jan, 2001.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: 

Dwight E. Nunn
Vice President
Engineering & Technical Services

State of California

County of San Diego

On 01/11/01 before me, Frances M. Cherber,
personally appeared Dwight E. Nunn, personally known
to me to be the person whose name is subscribed to the within instrument and
acknowledged to me that he executed the same in his authorized capacity, and that by
his signature on the instrument the person, or the entity upon behalf of which the
person acted, executed the instrument.

WITNESS my hand and official seal.



Signature

Frances M. Cherber

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-362
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 3 of the San Onofre Nuclear)	No. 190
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,
hereby submit Amendment Application No. 190. This Amendment Application consists of
Proposed Change Number 523 (PCN 523) to Facility Operating License No. NPF-15.

PCN 523 is a request to delete Technical Specification 5.5.2.2, "Post Accident Sampling
Program" and revise 5.5.2.8, "Primary Coolant Sources Outside Containment Program,"
using the Consolidated Line Item Improvement Process. This request would also delete
License Condition 2.C(17)d, "Post-Accident Sampling System (NUREG-0737 Item
II.B.3)."

Subscribed on this 11 day of Jan., 2001.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn

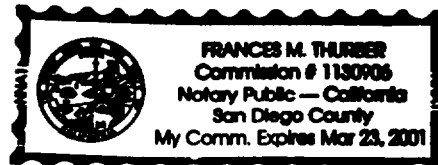
Dwight E. Nunn
Vice President
Engineering & Technical Services

State of California

County of San Diego

On 01/11/01 before me, Frances M. Thurber
personally appeared Dwight E. Nunn, personally known
to me to be the person whose name is subscribed to the within instrument and
acknowledged to me that he executed the same in his authorized capacity, and that by his
signature on the instrument the person, or the entity upon behalf of which the person
acted, executed the instrument.

WITNESS my hand and official seal.



Signature Frances M. Thurber

ATTACHMENT 1 DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed license amendment deletes the program requirements of Technical Specification (TS) 5.5.2.2, "Post Accident Sampling Program," for San Onofre Units 2 and 3. The proposed license amendment also revises TS 5.5.2.8, "Primary Coolant Sources Outside Containment," to reflect the elimination of the Post Accident Sampling System (PASS). The proposed license amendment also deletes License Conditions, 2.C(19)i for Unit 2 and 2.C(17)d for Unit 3, "Post-Accident Sampling System (NUREG-0737 Item II.B.3)."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this technical specification improvement was announced in the Federal Register on October 31, 2000, as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Southern California Edison has reviewed the safety evaluation published on October 31, 2000 as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., CE NPSD-1157, Revision 1, "Technical Justification for the Elimination of the Post-Accident Sampling System From the Plant Design and Licensing Bases for CEOG Utilities," dated May 5, 1999, as supplemented by letter dated April 14, 2000). Southern California Edison has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to San Onofre, Units 2 and 3 and justify this amendment for the incorporation of the changes to the San Onofre Technical Specifications.

2.2 Optional Changes and Variations

Southern California Edison is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

1. As described in the model safety evaluation published on October 31, 2000, the elimination of the TS and other regulatory requirements for PASS result in additional changes to the TS. These changes are the deletion of License Conditions, 2.C(19)j for Unit 2 and 2.C(17)e for Unit 3, "Post-Accident Sampling System (NUREG-0737 Item II.B.3)." The changes are necessary due to the removal of the TS section on PASS. The changes do not revise technical requirements beyond that addressed by the NRC staff in the model safety evaluation published on October 31, 2000
2. The San Onofre TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. Systems with post-accident sampling piping are specifically listed in TS 5.5.2.8 as falling under the scope of this requirement. As described in the staff's model safety evaluation published on October 31, 2000, Southern California Edison is proposing to add the following phrase to the reference to PASS in TS 5.5.2.8; "until such time as a modification eliminates the post-accident sampling piping as a potential leakage path."

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

Southern California Edison has reviewed the proposed no significant hazards consideration determination published on October 31, 2000 as part of the CLIIP. Southern California Edison has concluded that the proposed determination presented in the notice is applicable to San Onofre and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in Federal Register on October 31, 2000 for this technical specification improvement, plant-specific verifications were performed as follows:

1. Southern California Edison will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in emergency plan implementing procedures and implemented with the implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been established for San Onofre at radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability is described in emergency plan implementing procedures and has been implemented. The capability for classifying fuel damage events is considered a regulatory commitment.
3. Southern California Edison has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in our emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

4. ENVIRONMENTAL EVALUATION

Southern California Edison has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. Southern California Edison has concluded that the staff's findings presented in that evaluation are applicable to San Onofre and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2

PROPOSED LICENSE AND TECHNICAL SPECIFICATION CHANGE (MARK-UP)

ATTACHMENT 2A

SAN ONOFRE UNIT 2 (MARK-UP)

-10-

h. Reactor Coolant System Vents (II.B .1), SSER #1 , SSER #4)

By May 1, 1982, SCE shall provide procedures or procedure guidelines for reactor coolant gas vent system operation and testing.

i. ~~Post-Accident Sampling System (NUREG-0737 Item II.B.3)~~

~~The PASS shall be operable and the post-accident sampling program shall be implemented as described in the SCE letter of April 14, 1983, and revised by SCE letter of October 2, 1992. Deleted~~

j. Safety Valve Test Requirements (II.D.1, SSER #1)

SCE shall conform to the results of the EPRI test program. By April 1, 1982, SCE shall provide confirmation of the adequacy of the San Onofre 2 RCS safety valves based on a preliminary review of generic test program results. By July 1, 1982, SCE shall provide evidence supported by test of safety valve functionality for expected operating and accident (non-ATWS) conditions. The testing shall demonstrate that the valves will open and reclose under the expected flow conditions. By July 1, 1982, SCE shall provide an evaluation of the adequacy of the associated piping and supports at San Onofre 2.

k. Direct Indication of Safety Valve Position (II.D.3, SSER #1)

Prior to exceeding five (5) percent power, the safety valve position indication system shall be environmentally and seismically qualified consistent with the component or system to which it is attached, and documentation of this shall be provided.

l. AFW Pump 48-hour Endurance Test (II.E.1.1, SSER #1)

Prior to exceeding five (5) percent power, SCE shall conduct a 48-hour endurance test of all auxiliary feedwater pumps.

5.5 Procedures, Programs, and Manuals

5.5.2.1.1 Licensee-initiated changes to the ODCM: (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2.2 ~~Post-Accident Sampling Program~~

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, particulate, in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:~~

- ~~a. Training of personnel;~~
- ~~b. Procedures for sampling and analysis; and~~
- ~~c. Provisions for maintenance of sampling and analysis equipment.~~ Deleted

5.5.2.3 Radioactive Effluent Controls Program

This program conforming to 10 CFR 50.36a provides for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by operating procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 CFR 20, Appendix B, Table II, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;

(continued)

5.5 Procedures, Programs, and Manuals

5.5.2.7 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)

The program shall include:

- a. The limits for the concentrations of hydrogen and oxygen in the Gaseous Radwaste System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and
- b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank and fed into the gaseous radwaste vent system is less than the amount that would result in a whole body exposure of greater than or equal to 0.5 rem to any individual in the unrestricted area, in the event of an uncontrolled release of the tanks contents; and
- c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Waste Management System is less than the amount that would result in concentrations less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.2.8 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include high pressure safety injection recirculation, the shutdown cooling system, the reactor coolant sampling system (post-accident sampling piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), the containment spray system, the radioactive waste gas system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), and the liquid radwaste

(continued)

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.8 Primary Coolant Sources Outside Containment Program (continued)

system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path). The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.2.9 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containment, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. Program itself is relocated to the LCS.

5.5.2.10 Inservice Inspection and Testing Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components and Code Class CC and MC components including applicable supports. The program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program itself is located in the LCS.

5.5.2.11 Steam Generator (SG) Tube Surveillance Program

This program provides controls for monitoring SG tube degradation. Each SG shall be demonstrated OPERABLE by meeting the requirements of Specification 5.5.2.11 and by meeting an augmented inservice inspection program based on a modification of Regulatory Guide 1.83, Revision 1, which includes at least the following:

- a. SG Sample Selection and Inspection

Each SG shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of SG specified in Table 5.5.2.11-1 and 5.5.2.11-2.

- b. SG Tube Sample Selection and Inspection

The SG tube and sleeve minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 5.5.2.11-1 and 5.5.2.11-2. The inservice inspection of SG tubes and sleeves shall be performed at the frequencies specified in Specification 5.5.2.11.e and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 5.5.2.11.f. The tubes selected for each inservice inspection shall include at least 3% of the total

(continued)

ATTACHMENT 2B

SAN ONOFRE UNIT 3 (MARK-UP)

(17) NUREG-0737 Conditions (Section 22)

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. Procedures for Transients and Accidents (I.C.1, SSER #1, SSER #2, SSER #5)

Emergency procedures based on guidelines approved by the NRC shall be implemented prior to startup following the first refueling outage that occurs six months or more after NRC approval of the guidelines.

b. Procedures for Verifying Correct Performance of Operating Activities (I.C.6, SSER #1)

Prior to fuel loading, SCE shall implement a system for verifying the correct performance of operating activities, and shall keep the System in effect thereafter.

c. Control Room Design Review (I.D.1, SSER #1)

The control room modifications identified as required in Section 22, Item I.D.1 of Supplement No. 1 to the SER shall be installed and made operational on the schedules identified for each modification in Supplement No. 1 to the SER.

d. ~~Post Accident Sampling System (NUREG-0737 Item II.B.3)~~

~~The PASS shall be operable and the post-accident sampling program shall be implemented as described in the SCE letter of April 14, 1983, and revised by SCE letter of October 2, 1992. Deleted~~

e. Direct Indication of Safety Valve Position (II.D.3, SSER #1)

The safety valve position indication system shall be environmentally and seismically qualified consistent with the component or system to which it is attached, and documentation of this shall be maintained.

f. AFW Pump 48-hour Endurance Test (II.E.1.1, SSER #11)

Prior to exceeding five (5) percent power, SCE shall conduct a 48-hour endurance test of all auxiliary feedwater pumps. The results of the test shall be submitted to the NRC staff.

5.5 Procedures, Programs, and Manuals

5.5.2.1.1 Licensee-initiated changes to the ODCM: (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2.2 ~~Post-Accident Sampling Program~~

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, particulate, in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:~~

- ~~a. Training of personnel;~~
- ~~b. Procedures for sampling and analysis; and~~
- ~~c. Provisions for maintenance of sampling and analysis equipment.~~ Deleted

5.5.2.3 Radioactive Effluent Controls Program

This program conforming to 10 CFR 50.36a provides for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by operating procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 CFR 20, Appendix B, Table II, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;

(continued)

5.5 Procedures, Programs, and Manuals

5.5.2.7 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)

The program shall include:

- a. The limits for the concentrations of hydrogen and oxygen in the Gaseous Radwaste System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and
- b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank and fed into the gaseous radwaste vent system is less than the amount that would result in a whole body exposure of greater than or equal to 0.5 rem to any individual in the unrestricted area, in the event of an uncontrolled release of the tanks contents; and
- c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Waste Management System is less than the amount that would result in concentrations less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.2.8 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include high pressure safety injection recirculation, the shutdown cooling system, the reactor coolant sampling system (post-accident sampling piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), the containment spray system, the radioactive waste gas system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), and the liquid radwaste

(continued)

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.8 Primary Coolant Sources Outside Containment Program (continued)

system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path). The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.2.9 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containment, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. Program itself is relocated to the LCS.

5.5.2.10 Inservice Inspection and Testing Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components and Code Class CC and MC components including applicable supports. The program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. Program itself is located in the LCS.

5.5.2.11 Steam Generator (SG) Tube Surveillance Program

This program provides controls for monitoring SG tube degradation. Each SG shall be demonstrated OPERABLE by meeting the requirements of Specification 5.5.2.11 and by meeting an augmented inservice inspection program based on a modification of Regulatory Guide 1.83, Revision 1, which includes at least the following:

- a. SG Sample Selection and Inspection

Each SG shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of SG specified in Table 5.5.2.11-1 and 5.5.2.11-2.

- b. SG Tube Sample Selection and Inspection

The SG tube and sleeve minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 5.5.2.11-1 and 5.5.2.11-2. The inservice inspection of SG tubes and sleeves shall be performed at the frequencies specified in Specification 5.5.2.11.e and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 5.5.2.11.f. The tubes selected for each inservice inspection shall include at least 3% of the total

(continued)

ATTACHMENT 3

PROPOSED LICENSE AND TECHNICAL SPECIFICATION PAGES

ATTACHMENT 3A

SAN ONOFRE UNIT 2 (CLEAN)

-10-

h. Reactor Coolant System Vents (II.B .1), SSER #1 , SSER #4)

By May 1, 1982, SCE shall provide procedures or procedure guidelines for reactor coolant gas vent system operation and testing.

i. Deleted

j. Safety Valve Test Requirements (II.D.1, SSER #1)

SCE shall conform to the results of the EPRI test program. By April 1, 1982, SCE shall provide confirmation of the adequacy of the San Onofre 2 RCS safety valves based on a preliminary review of generic test program results. By July 1, 1982, SCE shall provide evidence supported by test of safety valve functionality for expected operating and accident (non-ATWS) conditions. The testing shall demonstrate that the valves will open and reclose under the expected flow conditions. By July 1, 1982, SCE shall provide an evaluation of the adequacy of the associated piping and supports at San Onofre 2.

k. Direct Indication of Safety Valve Position (II.D.3, SSER #1)

Prior to exceeding five (5) percent power, the safety valve position indication system shall be environmentally and seismically qualified consistent with the component or system to which it is attached, and documentation of this shall be provided.

l. AFW Pump 48-hour Endurance Test (II.E.1.1, SSER #1)

Prior to exceeding five (5) percent power, SCE shall conduct a 48-hour endurance test of all auxiliary feedwater pumps.

5.5 Procedures, Programs, and Manuals

5.5.2.1.1 Licensee-initiated changes to the ODCM: (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2.2 Deleted

5.5.2.3 Radioactive Effluent Controls Program

This program conforming to 10 CFR 50.36a provides for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by operating procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 CFR 20, Appendix B, Table II, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;

(continued)

5.5 Procedures, Programs, and Manuals

5.5.2.7 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)

The program shall include:

- a. The limits for the concentrations of hydrogen and oxygen in the Gaseous Radwaste System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and
- b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank and fed into the gaseous radwaste vent system is less than the amount that would result in a whole body exposure of greater than or equal to 0.5 rem to any individual in the unrestricted area, in the event of an uncontrolled release of the tanks contents; and
- c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Waste Management System is less than the amount that would result in concentrations less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.2.8 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include high pressure safety injection recirculation, the shutdown cooling system, the reactor coolant sampling system (post-accident sampling piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), the containment spray system, the radioactive waste gas system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), and the liquid radwaste

(continued)

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.8 Primary Coolant Sources Outside Containment Program (continued)

system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path). The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.2.9 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containment, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. Program itself is relocated to the LCS.

5.5.2.10 Inservice Inspection and Testing Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components and Code Class CC and MC components including applicable supports. The program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program itself is located in the LCS.

5.5.2.11 Steam Generator (SG) Tube Surveillance Program

This program provides controls for monitoring SG tube degradation. Each SG shall be demonstrated OPERABLE by meeting the requirements of Specification 5.5.2.11 and by meeting an augmented inservice inspection program based on a modification of Regulatory Guide 1.83, Revision 1, which includes at least the following:

- a. SG Sample Selection and Inspection

Each SG shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of SG specified in Table 5.5.2.11-1 and 5.5.2.11-2.

- b. SG Tube Sample Selection and Inspection

The SG tube and sleeve minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 5.5.2.11-1 and 5.5.2.11-2. The inservice inspection of SG tubes and sleeves shall be performed at the frequencies specified in Specification 5.5.2.11.e and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 5.5.2.11.f. The tubes selected for each inservice inspection shall include at least 3% of the total

(continued)

ATTACHMENT 3B

SAN ONOFRE UNIT 3 (CLEAN)

(17) NUREG-0737 Conditions (Section 22)

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. Procedures for Transients and Accidents (I.C.1, SSER #1, SSER #2, SSER #5)

Emergency procedures based on guidelines approved by the NRC shall be implemented prior to startup following the first refueling outage that occurs six months or more after NRC approval of the guidelines.

b. Procedures for Verifying Correct Performance of Operating Activities (I.C.6, SSER #1)

Prior to fuel loading, SCE shall implement a system for verifying the correct performance of operating activities, and shall keep the System in effect thereafter.

c. Control Room Design Review (I.D.1, SSER #1)

The control room modifications identified as required in Section 22, Item I.D.1 of Supplement No. 1 to the SER shall be installed and made operational on the schedules identified for each modification in Supplement No. 1 to the SER.

d. Deleted

e. Direct Indication of Safety Valve Position (II.D.3, SSER #1)

The safety valve position indication system shall be environmentally and seismically qualified consistent with the component or system to which it is attached, and documentation of this shall be maintained.

f. AFW Pump 48-hour Endurance Test (II.E.1.1, SSER #11)

Prior to exceeding five (5) percent power, SCE shall conduct a 48-hour endurance test of all auxiliary feedwater pumps. The results of the test shall be submitted to the NRC staff.

5.5 Procedures, Programs, and Manuals

5.5.2.1.1 Licensee-initiated changes to the ODCM: (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2.2 Deleted

5.5.2.3 Radioactive Effluent Controls Program

This program conforming to 10 CFR 50.36a provides for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by operating procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 CFR 20, Appendix B, Table II, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM;

(continued)

5.5 Procedures, Programs, and Manuals

5.5.2.7 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)

The program shall include:

- a. The limits for the concentrations of hydrogen and oxygen in the Gaseous Radwaste System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and
- b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank and fed into the gaseous radwaste vent system is less than the amount that would result in a whole body exposure of greater than or equal to 0.5 rem to any individual in the unrestricted area, in the event of an uncontrolled release of the tanks contents; and
- c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Waste Management System is less than the amount that would result in concentrations less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.2.8 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include high pressure safety injection recirculation, the shutdown cooling system, the reactor coolant sampling system (post-accident sampling piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), the containment spray system, the radioactive waste gas system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path), and the liquid radwaste

(continued)

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.8 Primary Coolant Sources Outside Containment Program (continued)

system (post-accident sampling return piping only until such time as a modification eliminates the post-accident piping as a potential leakage path). The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

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Each SG shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of SG specified in Table 5.5.2.11-1 and 5.5.2.11-2.

- b. SG Tube Sample Selection and Inspection

The SG tube and sleeve minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 5.5.2.11-1 and 5.5.2.11-2. The inservice inspection of SG tubes and sleeves shall be performed at the frequencies specified in Specification 5.5.2.11.e and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 5.5.2.11.f. The tubes selected for each inservice inspection shall include at least 3% of the total

(continued)

ATTACHMENT 4

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Southern California Edison in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Jack L. Rainsberry (949) 368-7420.

REGULATORY COMMITMENTS	Due Date/Event
Southern California Edison will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be initiated in emergency plan implementing procedures and implemented with the implementation of the License amendment. Establishment of contingency plans is considered a regulatory commitment.	Implemented with amendment
The capability for classifying fuel damage events at the Alert level threshold has been established for San Onofre at radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability is described in emergency plan implementing procedures and has been implemented. The capability for classifying fuel damage events is considered a regulatory commitment.	Complete
Southern California Edison has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in our site procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete