

September 14, 2005

Mr. Harold B. Ray
Executive Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 -
ISSUANCE OF AMENDMENTS ON ZIRLO™ CLAD FUEL (TAC NOS. MC4243
AND MC4244)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 199 to Facility Operating License No. NPF-10 and Amendment No. 190 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated August 26, 2004, as supplemented by letter dated July 18, 2005.

The amendments revise Technical Specification (TS) 4.2.1, "Fuel Assemblies," and TS 5.7.1.5, "Core Operating Limits Report (COLR)," to implement ZIRLO™ fuel rod cladding material into the fuel design for SONGS, Units 2 and 3.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Jack N. Donohew, Senior Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures: 1. Amendment No. 199 to NPF-10
2. Amendment No. 190 to NPF-15
3. Safety Evaluation

cc w/encls: See next page

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TS:(199) ML052570317

TS:(190) ML052570319

ACCESSION NO: ML052570659

NRR-058

***See memo dated 08/10/05**

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SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.199
License No. NPF-10

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated August 26, 2004, as supplemented by letter dated July 18, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 199, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance including the addition of the statements in the licensee's letter of August 26, 2004, that the licensee will calculate the corrosion thickness for the fuel using the best estimate model described in CENPD-404-P-A and the corrosion thickness will remain below the maximum allowable corrosion limit of 100 microns to the San Onofre Nuclear Generating Station, Units 2 and 3, Updated Final Safety Analysis Report.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/
Daniel S. Collins, Acting Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: September 14, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 199

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

4.0-1
5.0-27

INSERT

4.0-1
5.0-27

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.190
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated August 26, 2004, as supplemented by letter dated July 18, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 190, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance including the addition of the statements in the licensee's letter of August 26, 2004, that the licensee will calculate the corrosion thickness for the fuel using the best estimate model described in CENPD-404-P-A and the corrosion thickness will remain below the maximum allowable corrosion limit of 100 microns to the San Onofre Nuclear Generating Station, Units 2 and 3, Updated Final Safety Analysis Report.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/
Daniel S. Collins, Acting Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: September 14, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 190

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

4.0-1
5.0-27

INSERT

4.0-1
5.0-27

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 199 TO FACILITY OPERATING LICENSE NO. NPF-10
AND AMENDMENT NO. 190 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 to the Nuclear Regulatory Commission (NRC) dated August 26, 2004 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML042430435), Southern California Edison Company (SCE or the licensee) requested changes to the operating licenses for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The supplement dated July 18, 2005 (ADAMS Accession No. ML052010272), provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on September 28, 2004 (69 FR 57991).

Per its August 26, 2004 submittal, the licensee requests the following amendments:

- Technical Specification (TS) 4.2.1, "Fuel Assemblies," adds reference to ZIRLO™ clad fuel and filler rods.
- TS 5.7.1.5, "Core Operating Limits Report (COLR)," adds the following references to the list of analytical methods used to determine the core operating limits:
 1. "Calculative Methods for the CE Nuclear Power Large Break LOCA [loss-of-coolant accident] Evaluation Model," CENPD-132, Supplement 4-P-A, August 2000, and

2. "Implementation of ZIRLO™ Cladding Material in CE [Combustion Engineering] Nuclear Power Fuel Assembly Designs," CENPD-404-P-A, November 2001.

The licensee has requested these changes to implement ZIRLO™ fuel rod cladding material into the fuel design at SONGS, Units 2 and 3. The NRC staff's evaluation follows.

2.0 REGULATORY EVALUATION

The fuel cladding is the first barrier against radioactive release in a nuclear power plant. For light-water nuclear power plants, the cladding material is made of zircaloy which is an alloy of zirconium. For better fuel performance, Westinghouse modified the Zircaloy-4 material into an alloy they named ZIRLO™.

OPTIN™ is the cladding material that has been used in Combustion Engineering (CE)-designed pressurized-water reactors (PWRs). OPTIN™ falls within the overall Zircaloy-4 material specification. Small amounts of oxide spalling have been observed on OPTIN™ clad fuel; therefore, a more robust cladding with respect to corrosion and dimensional stability is desired. Use of ZIRLO™ cladding has been widespread since its approval in 1991 for Westinghouse-designed plants. No spallation has been observed on ZIRLO™ clad fuel, and the oxidation is significantly reduced compared to that with Zircaloy-4. Westinghouse Electric company (formerly Combustion Engineering) is implementing ZIRLO™ cladding material into its fuel design for CE-designed PWRs including SONGS, Units 2 and 3.

Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR), Appendix K, "ECCS [Emergency Core Cooling System] Evaluation Models," describes the required and acceptable features of the evaluation models used for loss-of-coolant accidents (LOCAs). The NRC staff previously reviewed and approved the topical report CENPD-404-P-A, which allows use of ZIRLO™ cladding material in CE-designed PWRs. The approval was subject to plant-specific conditions which individual licensees must address in their submittal requesting approval for use of ZIRLO™. Section 3.0 of this safety evaluation (SE) includes a discussion of how SCE meets these conditions for SONGS, Units 2 and 3.

Topical report CENPD-404-P-A requires the use of specific versions of the Westinghouse ECCS performance evaluation models for CE-designed PWRs. These evaluation models are CENPD-132, Supplement 4-P-A, "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model," and CENPD-137, Supplement 2-P-A, "Calculative Methods for the ABB [Asea Brown Boveri]-CE Small Break LOCA Evaluation Model." SONGS, Units 2 and 3 already include CENPD-137 Supplement 2-P-A as part of their current licensing basis. To reference CENPD-132 Supplement 4-P-A, there are plant-specific conditions that SCE must meet. A discussion of how SCE meets these conditions for SONGS, Units 2 and 3 is provided in Section 3.0 of this SE.

3.0 TECHNICAL EVALUATION

3.1 CENPD-404-P-A, Condition 1

Condition 1 states: The corrosion limit, as predicted by the best-estimate model will remain below 100 microns for all locations of the fuel.

SCE states in its August 26, 2004, submittal that it will calculate the corrosion thickness using the best-estimate model described in CENPD-404-P-A and that it will remain below 100 microns for all locations of the fuel. By including topical report CENPD-404-P-A in TS 5.7.1.5, the licensee is required to comply with it as part of its operating licenses for SONGS, Units 2 and 3. SCE also states in its August 26, 2004, submittal that it will add the maximum allowable corrosion limit of 100 microns be added to the SONGS, Units 2 and 3 Updated Final Safety Analysis Report (UFSAR). This commitment from the licensee to add the two statements to the UFSAR has been made a requirement of the license amendment.

Once the above statements about (1) SCE will calculate the corrosion thickness using the best-estimate model described in CENPD-404-P-A and (2) the corrosion thickness will remain below the maximum allowable corrosion limit of 100 microns are in the UFSAR, any changes to these statements must be made in accordance with 10 CFR 50.59. Therefore, SCE may not remove these statements from their UFSAR without a license amendment pursuant to 10 CFR 50.90 prior to implementing a proposed change, if the change results in a design-basis limit (e.g., corrosion thickness) for a fission product barrier (e.g., fuel cladding) to be exceeded or altered. Based on the statements above, the staff is assured that the licensee will meet Condition 1 of CENPD-404-P-A.

3.2 CENPD-404-P-A, Condition 2

Condition 2 states: All the conditions listed in the SEs for all the CENPD methodologies used for ZIRLO™ fuel analysis will continue to be met, except that the use of ZIRLO™ cladding in addition to Zircaloy-4 cladding is now approved.

For SONGS, Units 2 and 3, TS 5.7.1.5 lists all of the approved methods for determining values for the COLR. The SCE Reload Topical Report (SCE-9801-P-A) is included in TS 5.7.1.5 for both units and was reviewed and approved by the NRC on June 2, 1999. SCE states in its July 18, 2005, supplement that the processes outlined in Section 4 of SCE-9801-P-A are used to implement all NRC safety evaluation report limitations in all topical reports listed in TS 5.7.1.5. Since SCE is required to comply with all topical reports listed in TS 5.7.1.5 as part of its operating licenses, the staff is assured that the licensee will meet Condition 2 of CENPD-404-P-A.

3.3 CENPD-404-P-A, Condition 3

Condition 3 states: All CENPD methodologies will be used only within the range for which ZIRLO™ data was acceptable and for which the verifications discussed in CENPD-404-P-A and responses to requests for additional information were performed.

SCE-9801-P-A outlines processes for complying with all methodology and computer-code limitations and restraints. As part of the NRC review of SCE-9801-P-A, a second topical report, CEN-635(S)-P, was reviewed that delineates all limitations on the CENPD analysis methodology and computer codes. Both SCE-9801-P-A and CEN-635(S)-P are listed in TS 5.7.1.5 for SONGS, Units 2 and 3. Since SCE is required to comply with all topical reports listed in TS 5.7.1.5 as part of its operating licenses, the staff is assured that the licensee will meet Condition 3 of CENPD-404-P-A.

3.4 CENPD-404-P-A, Condition 4

Condition 4 states: Until data is available demonstrating the performance of ZIRLO™ cladding in CENPD-designed plants, the fuel duty will be limited for each CENPD-designed plant with some provision for an adequate margin to account for variations in core design (e.g., cycle length, plant operating conditions, etc.). Details of this condition will be addressed on a plant-specific basis during the approval to use ZIRLO™ in a specific plant.

A common practice within the nuclear industry has been to present experimental fuel-rod corrosion data as plots of the maximum oxide measured on a fuel rod versus the fuel-rod average burnup. This can be misleading because for a given burnup and cladding type, the corrosion can vary substantially due to other factors such as the coolant inlet temperature, the coolant flow rate, the power-peaking factors, adjacent rod powers, and the time taken to achieve the burnup. Westinghouse has identified an alternative to presenting corrosion data as a function of burnup called the Fuel Duty Index (FDI) and later the Modified Fuel Duty Index (FDIm). The FDIm model was briefly presented in CENPD-404-P-A, but the staff did not review that model as part of its review of the topical report. However, the staff acknowledged that the model appears to be a useful tool.

At the time CENPD-404-P-A was approved, there was extensive experience with ZIRLO™ cladding fuel in Westinghouse-designed plants but not CE-designed plants. However, Westinghouse showed that the most aggressive CE-designed plants were well within the database for the Westinghouse-designed plants. Therefore, the staff approved the use of ZIRLO™ cladding in CE-designed plants on a batch basis and imposed a restriction that the fuel duty be limited to that previously experienced by CE-designed plants with some provision for an adequate margin to accommodate variations in core design until data for actual ZIRLO™ performance in a CE core has been obtained.

In its July 18, 2005, supplemental letter, SCE committed to restrict the FDIm of each ZIRLO™ clad fuel pin to 110 percent of the established SONGS plant-specific FDIm limit of 586. A fraction of the fuel pins in up to eight assemblies will be allowed to attain 120 percent of the SONGS plant-specific FDIm limit. The staff finds it acceptable that SCE may exceed its established FDIm limit as stated due to the fact that ZIRLO™ cladding exhibits better corrosion resistance than OPTIN™. The baseline FDIm for SONGS will remain unchanged during the process of collecting additional data to support increasing the FDIm. The restriction on the FDIm for SONGS will be lifted only after consultation with the NRC. CE 16x16 ZIRLO™ oxide measurement data used to compare with the expected behavior will be shared with the NRC. SCE committed to meeting the 100 micron oxide limit regardless of the limit imposed on the FDIm. The NRC staff finds that this meets Condition 4 of CENPD-404-P-A, and is acceptable.

3.5 CENPD-404-P-A, Condition 5

Condition 5 states: The burnup limit for this approval is 60 GWd/MTU (Gigawatt days per metric ton).

SCE states that the maximum allowable burnup limit of 60 GWd/MTU will be added to the SONGS, Units 2 and 3 UFSAR. In accordance with 10 CFR 50.59, SCE shall obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a proposed change if the change results in a design-basis limit (e.g., burnup limit) for a fission-product barrier (e.g., fuel cladding) to be exceeded or altered. Based on this, the NRC staff is assured that the licensee will meet Condition 5 of CENPD-404-P-A.

3.6 CENPD-132, Supplement 4-P-A Conditions

In the SE for CENPD-132, Supplement 4-P-A, the NRC staff stated that the 1999 evaluation model described in the topical report (1999 EM) is acceptable for licensing applications for CENPD-designed PWRs subject to the limitations discussed. Those limitations and how they are met by SCE for SONGS, Units 2 and 3 are discussed in the following sections.

3.6.1 Reactor Water Storage Tank (RWST) Temperature

CENPD-132, Supplement 4-P-A, states that each licensee who uses the 1999 EM must ensure that the choice of the reactor water storage tank (RWST) temperature for safety injection and containment spray provides a bounding peak cladding temperature (PCT) result for the large break loss-of-coolant accident (LBLOCA) events.

The licensee states in its July 18, 2005, letter that the LBLOCA analysis will include an RWST temperature study. Its study will analyze the minimum and maximum RWST temperatures and the temperature that yields the highest PCT will be used in the break-spectrum analysis for the limiting fuel design. The NRC staff finds that this meets the related requirement in CENPD-132, Supplement 4-P-A, and is acceptable.

3.6.2 Safety Injection Pump (SIP) Actuation Time

CENPD-132, Supplement 4-P-A, shows a parametric study to show the impact of the SIP actuation time. The results of the study show that the SIP actuation during early reflood, based on the safety injection actuation signal and delay time, is the preferred actuation time.

SCE submitted details in its July 18, 2005, letter to demonstrate that the analysis performed in CENPD-132, Supplement 4-P-A, is applicable to all CE-designed PWRs and therefore applicable to SONGS, Units 2 and 3. Therefore, the NRC staff concludes that the preferred SIP actuation is during early reflood, is applicable to SONGS, Units 2 and 3, and is, therefore, acceptable.

3.6.3 Worst Single Failure Study

CENPD-132, Supplement 4-P-A, requires that each applicant referencing this topical report must determine a plant-specific worst single failure of the ECCS.

In its July 18, 2005, supplemental letter, SCE stated that its LBLOCA analysis will include a study of the plant-specific worst single failure of the ECCS. The study will analyze failure of an emergency diesel generator, failure of a low-pressure safety injection pump, failure of a high-pressure safety injection pump, and no failure. The failure that yields the highest PCT will be used in the break-spectrum analysis of the limiting fuel design. The NRC staff finds that this meets the related requirement in CENPD-132, Supplement 4-P-A, and is acceptable.

3.7 Conclusions

Based on the above evaluation, the NRC staff concludes that the licensee has demonstrated that it has met the plant-specific conditions given in the NRC staff's SE approving CENPD-404-P-A. Based on this, the NRC staff further concludes that the licensee's application to use ZIRLO™ clad fuel and filler rods at SONGS, Units 2 and 3 meets Appendix K of 10 CFR Part 50, and, therefore, the proposed amendments are acceptable.

In Amendment Nos. 197 and 188, issued July 19, 2005, for SONGS Units 2 and 3, respectively, the NRC approved changes to TS 5.7.1.5, "Core Operating Limits Report (COLR)," that re-organized the listing of NRC-approved analytical methods listed in TS 5.7.1.5.b and removed the revision numbers and dates of these methods. Those amendments also approved the listing of analytical methods in TS 5.7.1.5.b without their revision numbers or dates. Prior to the August 26, 2004, amendment request reviewed in this SE, CENPD-132, "Calculative Methods for the C-E Large Break LOCA Evaluation Model," was already included in the TS 5.7.1.5.b list of approved analytical methods. Hence, no changes to the SONGS Units 2 or 3 TSs are required to include CENPD-132, Supplement 4-P-A, dated August 2000, in TS 5.7.1.5.b, which is discussed in Section 3.6 of this SE. However, because an earlier version of CENPD-404-P-A, dated November 2001, was not previously included in TS 5.7.1.5.b, it is being added by the current amendments; however, it is being listed without the document date in a manner consistent with the changes to the TSs approved in Amendment Nos. 197 and 188.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding published September 28, 2004 (69 FR 57991). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR

51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the 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 Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: V. Klein
J. Donohew

Date: September 14, 2005

San Onofre Nuclear Generating Station
Units 2 and 3

cc:

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