

November 3, 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 RE: REVISE TECHNICAL SPECIFICATION  
3.6.3, "CONTAINMENT ISOLATION VALVES," SURVEILLANCE  
REQUIREMENTS (TAC NOS. MC5828 AND MC5829)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 201 to Facility Operating License No. NPF-10 and Amendment No. 192 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated February 3, 2005.

The amendments would modify Surveillance Requirements (SRs) 3.6.3.3 and 3.6.3.4, in TS 3.6.3, "Containment Isolation Valves," for containment isolation manual valves and blind flanges (CIVs) located inside and outside containment by adding a provision to exempt the CIVs that are locked, sealed, or otherwise secured from the valve position verification requirements in the SRs.

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 Donohew, Senior Project Manager  
Plant Licensing Branch G  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures: 1. Amendment No. 201 to NPF-10  
2. Amendment No. 192 to NPF-15  
3. Safety Evaluation

cc w/encls: See next page

November 3, 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 RE: REVISE TECHNICAL SPECIFICATION  
3.6.3, "CONTAINMENT ISOLATION VALVES," SURVEILLANCE  
REQUIREMENTS (TAC NOS. MC5828 AND MC5829)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 201 to Facility Operating License No. NPF-10 and Amendment No. 192 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated February 3, 2005.

The amendments would modify Surveillance Requirements (SRs) 3.6.3.3 and 3.6.3.4, in TS 3.6.3, "Containment Isolation Valves," for containment isolation manual valves and blind flanges (CIVs) located inside and outside containment by adding a provision to exempt the CIVs that are locked, sealed, or otherwise secured from the valve position verification requirements in the SRs.

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 Donohew, Senior Project Manager  
Plant Licensing Branch G  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures: 1. Amendment No. 201 to NPF-10  
2. Amendment No. 192 to NPF-15  
3. Safety Evaluation

cc w/encls: See next page

**DISTRIBUTION**

PUBLIC

LPLG r/f

GHill (4)

RidsOgcRp

GTaylor

CHaney/CHolden

DTerao

RidsNrrDipmlrob (TBoyce)

RidsRgn4MailCenter (TPruett)

RidsNrrPMJDonohew

RidsNrrLALFeizollahi

RidsAcrcAcnwMailCenter

RidsNrrDipmDpr

**TSs: (AMD. 201) ML053110364/(AMD.192) ML053110368 NRR-100**

**ACCESSION NO: ML052780467**

**PKG.: ML052780499**

**NRR-058**

OFFICE	LPLG/PM	LPLG/LA	IROB-A/SC	OGC	LPLG/BC
NAME	JDonohew	LFeizollahi	TBoyce	MSpencer	DTerao
DATE	11/2/05	11/2/05	10/20/2005	10/31/2005	11/3/05

OFFICIAL RECORD COPY

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. 201  
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 February 3, 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. 201, 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.

FOR THE NUCLEAR REGULATORY COMMISSION

**/RA/**

David Terao, Chief  
Plant Licensing Branch G  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: November 3, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 201

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

3.6-13

3.6-14

INSERT

3.6-13

3.6-14

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. 192  
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 February 3, 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. 192, 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.

FOR THE NUCLEAR REGULATORY COMMISSION

**/RA/**

David Terao, Chief  
Plant Licensing Branch G  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: November 3, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 192

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

3.6-13  
3.6-14

INSERT

3.6-13  
3.6-14



SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 201 TO FACILITY OPERATING LICENSE NO. NPF-10  
AND AMENDMENT NO. 192 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 February 3, 2005 (Agencywide Documents and Access Management System Accession No. ML050380403), Southern California Edison Company (the licensee) requested changes to the Technical Specifications (TSs) for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The proposed changes would revise Surveillance Requirements (SRs) 3.6.3.3 and 3.6.3.4, in TS 3.6.3, "Containment Isolation Valves," for containment Isolation manual valves and blind flanges (CIVs) located inside and outside containment, by adding a provision to exempt CIVs that are locked, sealed, or otherwise secured from the position verification requirements. The licensee stated that this proposed change, which provides some relaxation for valve position verification in SRs 3.6.3.3 and 3.6.3.4, would potentially reduce the occupational dose received by SONGS, Units 2 and 3, operations personnel conducting these surveillances.

The proposed TS changes are consistent with (1) the Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) Standard TS Change Traveler, TSTF-45, Revision 2 (TSTF-45), "Exempt Verification of CIVs (Containment Isolation Valves) That Are Locked, Sealed, or Otherwise Secured," which was approved by the NRC on July 26, 1999; and (2) the improved standard TSs in NUREG-1432, Revision 3, "Standard Technical Specifications (STSS), Combustion Engineering Plants," dated March 2004.

## 2.0 REGULATORY EVALUATION

In 10 CFR 50.36, the NRC issued a rule and established its regulatory requirements related to the content of TSs. In doing so, the NRC emphasized those matters related to the prevention of accidents and mitigation of consequences of such accidents. As recorded in the Statements of Consideration, Technical Specifications for Facility Licenses: Safety Analysis Reports

(33 FR 18610, December 17, 1968), the NRC noted that licensees are expected to incorporate into their plant TSs those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity. Pursuant to 10 CFR 50.36, TSs are required to include items in five specific categories related to station operation. Specifically, those categories include: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls.

Although the rule does not specify the particular requirements to be included in a plant's TSs, the NRC staff has issued improved standard TSs in NUREG-1432 for Combustion Engineering (CE) plants, such as SONGs, Units 2 and 3, that meet 10 CFR 50.36.

In its application, the licensee has proposed to implement NUREG-1432, as modified by TSTF-45. These changes were incorporated in Revision 3 of NUREG-1432.

### 3.0 TECHNICAL EVALUATION

The CIVs are not being modified in this amendment. In its application, the licensee proposed the following changes to SRs 3.6.3.3 and 3.6.3.4, which require verification of valve position for CIVs located outside and inside containment, respectively:

1. SR 3.6.3.3 is modified by the addition of the words "and not locked, sealed, or otherwise secured" between the words "located outside containment" and "and is required." The proposed wording is consistent with that in NUREG-1432, Revision 3, as modified by TSTF-45. The surveillance frequency for SR 3.6.3.3 is not being changed by this amendment.
2. SR 3.6.3.4 is modified by the addition of the words "and not locked, sealed, or otherwise secured" between the words "located inside containment" and "and required." The proposed wording is consistent with that in NUREG-1432, Revisions 3, as modified by TSTF-45. The surveillance frequency for SR 3.6.3.4 is not being changed by this amendment.

The licensee stated that the design basis of the CIVs is not affected by the proposed change to SRs 3.6.3.3 and 3.6.3.4, and that the proposed wording of the change regarding verification of valves is identical to that approved by the NRC in TSTF-45 and, subsequently, added to NUREG-1432, Revision 3. Adding the words "and not locked, sealed, or otherwise secured" to SRs 3.6.3.3 and 3.6.3.4 will exclude those valves that are locked, sealed, or otherwise secured in the closed position from the verification requirement specified in these SRs. Because the SRs are intended to ensure verification of valve positions that could be inadvertently repositioned, it is not necessary to check the CIVs that are locked, sealed, or otherwise secured because these valves were verified to be in the correct position when they were locked, sealed, or secured. Additionally, the proposed change is consistent with changes already incorporated in other SONGS TSs on valves for the same reasons (e.g., emergency core cooling system valves (SR 3.5.2.3), auxiliary feedwater system valves (SR 3.7.5.1), and salt water cooling system valves (SR 3.7.8.1)).

The licensee has administrative controls that govern position verification for locked, sealed, or otherwise secured valves and blind flanges such that there is a very low probability that unacceptable alignment can occur. Since it is improbable that a locked, sealed, or otherwise secured valve could be inadvertently re-positioned, and because valve positions of such valves for important systems are verified at least once each refueling outage, the addition of the above stated phrases do not significantly reduce safety and, as stated by the licensee, should reduce the occupational dose received by personnel while conducting these surveillances. In addition the licensee has stated that administrative controls currently in place at SONGS will continue to provide assurance that normally closed manual containment isolation devices that are locked, sealed or otherwise secured, are administratively controlled to remain in the required position.

Based on this, the NRC staff concludes that the proposed changes to SRs 3.6.3.3 and 3.6.3.4, do not change the intent of the SRs to determine if LCO 3.6.3 is being met and, therefore, the proposed changes to SRs 3.6.3.3 and 3.6.3.4 are in conformance with 10 CFR 50.36. Based on this conclusion, the NRC staff concludes that the proposed amendments are acceptable.

#### 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 on March 1, 2005 (70 FR 9996). 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 Contributors: G. Taylor  
J. Donohew

Date: November 3, 2005

San Onofre Nuclear Generating Station

Units 2 and 3

cc:

Mr. Daniel P. Breig, Plant Manager  
Nuclear Generation  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P. O. Box 128  
San Clemente, CA 92674-0128

Mr. Douglas K. Porter  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

Mr. David Spath, Chief  
Division of Drinking Water and  
Environmental Management  
P. O. Box 942732  
Sacramento, CA 94234-7320

Chairman, Board of Supervisors  
County of San Diego  
1600 Pacific Highway, Room 335  
San Diego, CA 92101

Eileen M. Teichert, Esq.  
Supervising Deputy City Attorney  
City of Riverside  
3900 Main Street  
Riverside, CA 92522

Mr. Gary L. Nolff  
Power Projects/Contracts Manager  
Riverside Public Utilities  
2911 Adams Street  
Riverside, CA 92504

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

Mr. Michael Olson  
San Diego Gas & Electric Company  
P.O. Box 1831  
San Diego, CA 92112-4150

Mr. Ed Bailey, Chief

Radiologic Health Branch  
State Department of Health Services  
Post Office Box 997414 (MS7610)  
Sacramento, CA 95899-7414

Resident Inspector/San Onofre NPS  
c/o U.S. Nuclear Regulatory Commission  
Post Office Box 4329  
San Clemente, CA 92674

Mayor  
City of San Clemente  
100 Avenida Presidio  
San Clemente, CA 92672

Mr. James T. Reilly  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

Mr. James D. Boyd, Commissioner  
California Energy Commission  
1516 Ninth Street (MS 31)  
Sacramento, CA 95814

Mr. Ray Waldo, Vice President  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92764-0128

Mr. Brian Katz  
Vice President, Nuclear Oversight and  
Regulatory Affairs.  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92764-0128

Mr. Steve Hsu  
Department of Health Services  
Radiologic Health Branch  
MS 7610, P.O. Box 997414  
Sacramento, CA 95899

August 2005