SOUTHERN CALIFORNIA
EDISON
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Brian Katz
Vice President

December 6, 2005

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

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
DOCKET NOs. 50-361 and 50-362
PROPOSED CHANGE NUMBER (PCN) 521
APPLICATION TO AMEND THE TECHNICAL SPECIFICATIONS TO DELETE THE REQUIREMENTS FOR FUEL HANDLING ISOLATION SIGNALS AND FUEL HANDLING BUILDING POST-ACCIDENT CLEANUP FILTER SYSTEMS

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) hereby requests an amendment to the Technical Specifications (TS) for the San Onofre Nuclear Generating Station, Units 2 and 3.

The proposed amendment will delete TS Limiting Condition For Operation (LCO) 3.3.10, "Fuel Handling Isolation Signal (FHIS)," and TS LCO 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System," and their associated Surveillance Requirements. The proposed amendment will also delete the Fuel Handling Building Post-Accident Cleanup Filter Systems from the Ventilation Filter Testing Program in administrative TS 5.5.2.12. SCE has concluded that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

SCE requests approval of the proposed License Amendment by November 30, 2006, with the amendment being implemented within 60 days of approval of this amendment request.

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

A001

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San Clemente, CA 92674-0128
949-368-9275
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If you should have any questions regarding this submittal, please contact Mr. Jack Rainsberry at 949-368-7420.

Sincerely,

Brian Katz

Enclosures:

1. Notarized affidavit
2. Licensee's evaluation of the proposed change

Attachments:

1. Description and Assessment of Proposed Change
2. Existing Technical Specification Pages, Unit 2
3. Proposed Technical Specification Changes, Unit 2
4. Revised Technical Specification Pages, Unit 2
5. Existing Technical Specification Pages, Unit 3
6. Proposed Technical Specification Changes, Unit 3
7. Revised Technical Specification Pages, Unit 3
8. Summary of Licensee Commitments

cc: B. S. Mallett, Regional Administrator, NRC Region IV,
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3
S. Y. Hsu, California Department of Health Services, Radiologic Health Branch

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use A Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	)	Docket No. 50-361 Amendment Application No. 239

SOUTHERN CALIFORNIA EDISON COMPANY, et al. pursuant to 10CFR50.90, hereby submit Amendment Application No. 239. This amendment application consists of Proposed Change Number (PCN) 521 to Facility Operating License NPF-10. PCN-521 is a request to delete Technical Specification (TS) 3.3.10, "Fuel Handling Isolation Signal (FHIS), TS 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System," and to remove the latter system from the Ventilation Filter Testing Program in TS 5.5.2.12 for San Onofre Nuclear Generating Station Unit 2.

State of California
County of San Diego

Brian Katz
Brian Katz, Vice President

Subscribed and sworn to (or affirmed) before me on this 6th day of December, 2005,

by Brian Katz,

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Mariane Sanchez
Notary Public

MARIANE SANCHEZ
Commission # 1375470
Notary Public - California
San Diego County
My Comm. Expires Oct 14, 2006

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use A Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)	Docket No. 50-362 Amendment Application No. 223

SOUTHERN CALIFORNIA EDISON COMPANY, et al. pursuant to 10CFR50.90, hereby submit Amendment Application No. 223. This amendment application consists of Proposed Change Number (PCN) 521 to Facility Operating License NPF-15. PCN-521 is a request to delete Technical Specification (TS) 3.3.10, "Fuel Handling Isolation Signal (FHIS), TS 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System," and to remove the latter system from the Ventilation Filter Testing Program in TS 5.5.2.12 for San Onofre Nuclear Generating Station Unit 3.

State of California
County of San Diego

Brian Katz
Brian Katz, Vice President

Subscribed and sworn to (or affirmed) before me on this 6th day of December, 2005,
by Brian Katz,

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Marianne Sanchez
Notary Public

MARIANE SANCHEZ
Commission # 1375470
Notary Public - California
San Diego County
My Comm. Expires Oct 14, 2006

PCN-521
ENCLOSURE 2
ATTACHMENT 1

DESCRIPTION AND ASSESSMENT OF PROPOSED CHANGE

LICENSEE'S EVALUATION

Subject: The proposed change is a request to delete Technical Specification 3.3.10, "Fuel Handling Isolation Signal (FHIS)," and Technical Specification 3.7.14 "Fuel Handling Building Post-Accident Cleanup Filter System," and to remove the Fuel Handling Building Post-Accident Cleanup Filter System from the Ventilation Filter Testing Program in Technical Specification 5.5.2.12.

1.0 DESCRIPTION

This letter is a request to amend Operating Licenses NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 & 3), respectively.

The proposed change would delete Technical Specification (TS) 3.3.10, "Fuel Handling Isolation Signal (FHIS)," and TS 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System," and would also remove the Fuel Handling Building Post-Accident Cleanup Filter System from the Ventilation Filter Testing Program in TS 5.5.2.12. This submittal demonstrates that the FHIS and the Fuel Handling Building Post-Accident Cleanup Filter System do not meet any of the four regulatory criteria of 10 CFR 50.36 for inclusion in the Technical Specifications.

2.0 PROPOSED CHANGE

The proposed change will delete TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)," and TS 3.7.14 "Fuel Handling Building Post-Accident Cleanup Filter System," and will remove the Fuel Handling Building Post-Accident Cleanup Filter System from the Ventilation Filter Testing Program in TS 5.5.2.12.

At this time SONGS 2 & 3 do not plan to implement modifications to physically remove the filters or charcoal adsorbers from the system design.

Southern California Edison (SCE) will implement a Licensee Controlled Specification (LCS) change to transfer the operability and functional requirements of the isolation and cleanup systems to the LCS. The required surveillances will include the current requirements to test the system operation, including automatic isolation on high radiation. In this transfer the Fuel Handling Building Post-Accident Cleanup Filter System (PACFS) Limiting Condition for Operation requirement for two operable systems will be reduced to one system operable during movement of irradiated fuel in the fuel building. Completion Times for both FHIS and PACFS inoperabilities will be revised from "Immediately" to "1 hour" to allow for orderly completion of the Required Action after discovery of inoperability. The Fuel Handling Building PACFS will be removed from the Ventilation Filter Testing Program of TS 5.5.2.12, and testing of the charcoal adsorbers and the high efficiency particulate air filters will no longer be required. The LCS for FHIS will continue to require the surveillances currently contained in SRs 3.3.10.1, 3.3.10.2, 3.3.10.3, 3.3.10.4, 3.3.10.5. The LCS for PACFS will continue to require the surveillances currently contained in SRs 3.7.14.1 and 3.7.14.3. This will ensure a conservative defense in depth position by testing the initiation function of the FHIS system.

The Fuel Handling Building (FHB) airborne radiation monitors 2RE7822G1 and 2RE7823G2 (Unit 2) and 3RE7822G1 and 3RE7823G2 (Unit 3) (all four together identified as 2(3)RE7822G1 and 2(3)RE7823G2) provide for the automatic isolation of the FHB Ventilation System. As noted in the following Section, automatic isolation of the FHB Ventilation System is not a required safety function. However, the operability function will be maintained by moving the operability requirements for these monitors into the LCS.

The deletion of TS 3.3.10 and TS 3.7.14 will affect TS Table of Contents pages iii, iv, vii, and viii. These pages will reflect that TS 3.3.10 and TS 3.7.14 and their Bases are deleted. Markups of the deleted Technical Specifications are provided in Enclosure 2 Attachments 3 and 6.

The TS Bases for TS 3.3.10 and TS 3.7.14 will be deleted. As SONGS has a Technical Specification Bases change control program, and because this proposed change is straightforward (i.e., deletion of entire sections), a markup of the affected Bases pages is not provided in this license amendment request.

This license amendment request documents that the potential radiological consequences of a design basis fuel handling accident inside the Fuel Handling Building (FHA-FHB), modeled without mitigation by the FHIS and the FHB PACFS, are within the guidelines of 10CFR100 for an individual at the Exclusion Area Boundary (EAB) and an individual at the Low Population Zone (LPZ) outer boundary, and are within the limits of 10CFR50, Appendix A, General Design Criterion 19 for a Control Room operator. Because these systems are not necessary for protection of members of the public and plant personnel, it is not appropriate to classify them as engineered safety features. Therefore, upon NRC approval of this amendment request, SCE intends to revise the Updated Final Safety Evaluation Report (Reference 7.1) to remove designations of these systems as engineered safety features.

3.0 BACKGROUND

The Fuel Handling Building Ventilation System (FHBVS) is designed to maintain a suitable environment for equipment operation and personnel access during normal operation. A subsystem, the FHB PACFS, is designed to mitigate the consequences of a release of radioactivity during normal operation and Anticipated Transients. On this basis, this subsystem is currently classified and designed as an Engineered Safety Features (ESF) air cleanup system. The design basis of the FHBVS is unchanged by this license amendment request. The FHBVS distributes air throughout the building from areas of low potential radioactivity to areas of higher potential activity. The design basis accident of interest for this system is the FHA-FHB. During fuel handling operations, a controlled space in the spent fuel pool area is maintained by closing the doors of the building. FHB airborne radiation monitors 2(3)RE7822G1 and 2(3)RE7823G2 will initiate isolation of the normal ventilation system and automatically initiate the filtration flow path upon detection of radioactivity released from a dropped fuel assembly.

4.0 TECHNICAL ANALYSIS

Updated Final Safety Analysis Report (UFSAR) Sections 15.7 and 15.10.7 document the various accidents that may occur inside the FHB. The event with the most severe offsite and control room radiological dose consequences is the FHA-FHB.

Per UFSAR Sections 15.7.3.4 and 15.10.7.3.4, the FHA-FHB dose analysis postulates the inadvertent dropping of a fuel assembly during fuel handling operations, and the consequent rupture of 60 fuel rods in the dropped assembly.

4.1 Current Licensing Basis FHA-FHB Dose Analysis

The current FHA-FHB analysis of record (AOR) was performed using the methodology described in SONGS UFSAR Sections 15.7.3.4, 15.10.7.3.4, Appendix 15B, Appendix 15.10.B (Reference 7.1) including the assumption that the FHB is open to the outside environment. The AOR uses the assumptions and

methodology of Regulatory Guide 1.25 (Reference 7.2) and Standard Review Plan 15.7.4 (Reference 7.4). Table 1 lists the primary assumptions and input parameters employed in the FHA-FHB dose AOR associated with the first 8 hours of the event as described in the UFSAR.

Consistent with the FHA-FHB dose AOR described in the UFSAR, the FHA-FHB dose analysis supporting this license amendment request does not model the generation of an Engineered Safety Feature Actuation System (ESFAS) fuel handling [building] isolation signal (FHIS). The FHB normal ventilation exhaust is assumed to remain in operation throughout the FHA-FHB event. In addition, consistent with the FHA-FHB dose AOR described in the UFSAR, the FHA-FHB dose analysis supporting this license amendment request does not credit iodine and aerosol removal by the filters present in the FHB PACFS.

The only differences between the FHA-FHB dose AOR described in the UFSAR and the FHA-FHB dose analysis supporting this license amendment request are in the following input parameters:

1) 1000 cfm of unfiltered in-leakage into the control room, rather than the 10 cfm modeled in the FHA-FHB dose AOR, and

2) 1.75 radial peaking factor (RPF), rather than the 1.71 RPF modeled in the FHA-FHB dose AOR.

Table 1 lists the primary assumptions and input parameters employed in the FHA-FHB dose analysis associated with the first 8 hours of the event.

The following assumptions reflect the discretionary conservatism of the analysis:

1) The fuel rod gap region is assumed to contain 12 percent of the fission product iodine inventory. This value is consistent with the current licensing basis. This value exceeds the 8 percent recommended by Regulatory Guide 1.183 (Reference 7.5) and Regulatory Guide 1.195 (Reference 7.6).

2) The spent fuel pool (SFP) water overall effective decontamination factor (DF) for iodine is assumed to be 100. This value is consistent with the current licensing basis. This value is smaller than the DF of 200 recommended by Regulatory Guide 1.183 and Regulatory Guide 1.195.

3) The total control room unfiltered inleakage rate is assumed to be 1000 cfm, representing 990 cfm of unfiltered inleakage via the control room envelope (CRE) boundary, plus 10 cfm of unfiltered inleakage due to control room ingress and egress. The assumed unfiltered inleakage rate exceeds the CRE inleakage rate of 259 cfm (including uncertainty) based on CRE tracer gas test results (Reference 7.7). The assumed unfiltered inleakage rate also greatly exceeds the 10 cfm modeled in the FHA-FHB dose analysis of record.

The FHA-FHB dose analysis assumes that failure of the fuel rods results in an instantaneous release of all the noble gas and iodine gap activity in each failed fuel rod into the spent fuel pool water. The iodine and noble gas bubbles released from the damaged fuel pins pass up through the 23 feet of SFP water covering the

damaged fuel. The iodine and noble gas released from the SFP water are assumed to collect in the FHB atmosphere and be exhausted to the environment within two hours.

The acceptance limits for offsite radiation exposure are contained in Standard Review Plan (SRP) Section 15.7.4 (Reference 7.4), which defines "well within" 10 CFR Part 100 to be 25% or less of the 10 CFR 100 values. The resulting values for offsite doses are listed in Table 2.

TABLE 1
INPUT PARAMETERS USED FOR CALCULATING FHA-FHB RADIOLOGICAL CONSEQUENCES

Source Term and FHB Parameters	Proposed Value	UFSAR (AOR) Value
Core Thermal Power, MWt	3,458	3,458
Time Between Plant Shutdown and Accident, hours	72	72
Radial Peaking Factor	1.75	1.71
Number of Damaged Fuel Rods	60	60
Fission Product Gases in Fuel Rod Gap Region, %		
Krypton-85	30	30
Other Noble Gases	10	10
Iodine	12	12
Fraction of Gap Activity Released to the Spent Fuel Pool Water, %	100	100
Minimum Water Depth Above Damaged Fuel Rods, feet	23	23
Spent Fuel Pool Water Decontamination Factors:		
Nobles Gases	1	1
Iodine	100	100
Airborne Iodine Forms, %		
Elemental	75	75
Organic	25	25
Fuel Handling Building model		
Fuel Handling [Building] Isolation Signal (FHIS)	Not modeled	Not modeled
FHB Post-Accident Cleanup Filter System iodine removal	Not modeled	Not modeled
Activity Release Duration from FHB, hours	2	2
FHB Net Free Volume, cubic feet	365,305	365,305
FHB Air Exhaust Flow Rate, cfm	25,581	25,581
Exclusion Area Boundary (EAB) Parameters (0 to 2 hours)	**Proposed Value**	**UFSAR (AOR) Value**
Atmospheric Dispersion Factor to EAB, sec/m^3	2.72e-4	2.72e-4
Thyroid Inhalation Dose Conversion Factors	ICRP-30	ICRP-30
EAB Breathing Rate, m^3/sec	3.47e-4	3.47e-4
EAB Occupancy Factor	1.0	1.0
Low Population Zone (LPZ) Parameters (0 to 8 hours)	**Proposed Value**	**UFSAR (AOR) Value**
Atmospheric Dispersion Factors to LPZ, sec/m^3	7.72e-6	7.72e-6
Thyroid Inhalation Dose Conversion Factors	ICRP-30	ICRP-30
LPZ Breathing Rate, m^3/sec	3.47e-4	3.47e-4
LPZ Occupancy Factor	1.0	1.0

TABLE 1 INPUT PARAMETERS USED FOR CALCULATING FHA-FHB RADIOLOGICAL CONSEQUENCES		
Control Room (CR) Parameters (0 to 8 hours)	**Proposed Value**	**UFSAR (AOR) Value**
Atmospheric Dispersion Factor to CR, sec/m^3	3.1e-3	3.1e-3
Thyroid Inhalation Dose Conversion Factors	ICRP-30	ICRP-30
CR Breathing Rate, m^3/sec	3.47e-4	3.47e-4
CR Occupancy Factor	1.0	1.0
CR Volume, cubic feet	266,920	266,920
CR Normal HVAC System Operation (0 to 3 minutes):		
Normal Operation Unfiltered Inflow Rate, cfm	5,820	5,820
Total Unfiltered Inleakage Rate, cfm	1,000	10
CR Isolation (switchover to CREACUS), minutes	3	3
CREACUS Operation (3 minutes to 8 hours):		
Filtered Inflow Rate, cfm	4,400	4,400
Filtered Recirculation Rate, cfm	59,869	59,869
Total Unfiltered Inleakage Rate, cfm	1,000	10
Inflow and Recirculation Filter Efficiencies, % Elemental Iodine Organic Iodide Particulates	 95 95 99	 95 95 99

Table 2 CALCULATED RADIOLOGICAL CONSEQUENCES		
Exclusion Area Boundary (0 to 2 hour dose)	**Dose**	**SRP 15.7.4 Limits**
Thyroid	18.8 Rem	75 Rem
Whole Body	< 0.1 Rem	6 Rem
Low Population Zone (event duration dose)	**Dose**	**SRP 15.7.4 Limits**
Thyroid	0.5 Rem	75 Rem
Whole Body	< 0.1 Rem	6 Rem
Control Room Operator (event duration dose)	**Dose**	**GDC-19 (and SRP 6.4) Limits**
Thyroid	9.3 Rem	30 Rem (equivalent to 5 Rem WB)
Whole Body	<0.1 Rem	5 Rem
Beta Skin	1.2 Rem	30 Rem (equivalent to 5 Rem WB)

The offsite dose consequences are within the SRP Section 15.7.4 limits of 75 Rem thyroid and 6 Rem whole body. The calculated offsite doses are higher than the doses currently documented in UFSAR Section 15.10.7.3.4 due to the modeling of a 1.75 RPF, rather than the 1.71 RPF currently modeled in the FHA-FHB dose AOR .

General Design Criterion 19 of 10 CFR Part 50 Appendix A specifies that adequate radiation protection is to be provided to permit access and occupancy of the control room under accident conditions without personnel exposures in excess of 5 Rem whole body (WB) or its equivalent to any part of the body for the duration of the accident. The SRP Section 6.4 (Reference 7.3) limits are 5 Rem whole body gamma and 30 Rem thyroid inhalation for the control room operator. The resulting values for control room operator doses are listed in Table 2. The control room doses are higher than the doses currently documented in UFSAR Section 15.10.7.3.4 due to differences in the following input parameters:

1) 1000 cfm of unfiltered in-leakage into the control room, rather than the 10 cfm modeled in the FHA-FHB dose AOR, and

2) 1.75 RPF, rather than the 1.71 RPF modeled in the FHA-FHB dose AOR.

Based on the evaluation, SCE concludes that the radiological consequences of removing both Technical Specifications 3.3.10, "Fuel Handling Isolation Signal (FHIS)," and 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System," remain acceptable.

4.2 Impact on Alternative Source Term FHA-FHB Dose Analysis

Full-scope implementation of the Alternative Source Term (AST) methodology requires re-analysis of the Updated Final Safety Analysis Report (UFSAR) Chapter 15 accident analyses, including the FHA-FHB. Pursuant to 10 CFR 50.90, Southern California Edison had previously submitted Amendment Application Numbers 231 and 215 for San Onofre Units 2 and 3, respectively. These amendment requests, referred to as Proposed Change Number PCN-555, would revise the SONGS 2 & 3 accident source term used in the design basis radiological consequences analyses (Reference 7.8).

Consistent with the scope of this license amendment request, the FHA-FHB AST dose analysis previously submitted with PCN-555 does not model the generation of an ESFAS FHIS. The FHB normal ventilation exhaust is assumed to remain in operation throughout the FHA-FHB event.

Consistent with the scope of this license amendment request, the FHA-FHB AST dose analysis previously submitted with PCN-555 does not credit iodine and aerosol removal by the filters present in the FHB PACFS.

Approval of this license amendment request will not alter the modeling in the FHA-FHB AST dose analysis. Consequently, approval of this license amendment request will not impact the FHA-FHB AST dose analysis previously submitted with PCN-555.

4.3 Technical Analysis Conclusion

The proposed change is to delete TS 3.3.10 and TS 3.7.14, and to remove the FHB PACFS from the Ventilation Filter Testing Program in TS 5.5.2.12. SONGS 2 and 3 will implement Licensee Controlled Specification changes to maintain a requirement for the operability of the FHBVS outside the requirements of the Ventilation Filter Testing Program of TS 5.5.2.12. These changes are justified by the fact that the FHA-FHB dose analysis demonstrates that

offsite and control room doses will remain within the acceptance criteria with no credit for FHIS actuation, and no credit for iodine and aerosol removal by the filters present in the FHB PACFS. Because these systems are not necessary for protection of members of the public and plant personnel, it is not appropriate to classify them as engineered safety features. Therefore, upon NRC approval of this amendment request, SCE intends to revise the Updated Final Safety Evaluation Report (Reference 7.1) to remove designations of these systems as engineered safety features.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

Southern California Edison has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendments," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

The Fuel Handling Building (FHB) Post-Accident Cleanup Filter System (PACFS) and its initiating radiation monitors are not involved in the initiation of any accidents. The PACFS is not credited with providing any supplemental filtration of releases from an accident occurring in the FHB. The PACFS was designed to provide an accident mitigation function by isolating the system and filtering the radioiodines that may be released from a damaged fuel assembly in the event of a Fuel Handling Accident (FHA). The charcoal adsorber was the primary component that supported this filtration function. However, the FHA dose consequences analysis has demonstrated that doses due to the FHA, to both the public and the control room operators, remain well within regulatory acceptance limits even assuming no credit for either isolation or filtration. The charcoal filtration function is not required and need not be tested. Thus, there is no required safety function provided by either the ventilation system or the airborne radiation monitor in the event of a fuel handling accident.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No.

The FHB PACFS and its initiating radiation monitors do not initiate any accidents. The PACFS was designed to provide an accident mitigation function by isolating the system and filtering the radioiodines that may be released from a damaged fuel assembly in the event of a Fuel Handling Accident. Analysis shows that the isolation and filtration functions are not required. The charcoal adsorber cannot influence any

accident initiators. The deletion of the Technical Specification requirements does not impact this conclusion and does not influence any new potential accident scenarios in any way.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

   Response: No.

The FHB PACFS and its initiating radiation monitors were designed to provide an accident mitigation function by filtering the radioiodines that may be released from a damaged fuel assembly in the event of a Fuel Handling Accident. Analysis of the FHA in the FHB demonstrates that the margin of safety provided by the Technical Specification requirement will not change. Since the control room charcoal adsorber is capable of accommodating the design basis loss of coolant accident fission product halogen loadings, which are more limiting than the fuel handling accident loadings, more than adequate design margin is available with respect to postulated FHA releases. The margin of safety, in terms of the dose limitations of 10CFR100 and 10CFR50 Appendix A, General Design Criterion 19, has not been significantly reduced.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Southern California Edison concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

5.2.1 10 CFR 50.36, "Technical Specifications"

10 CFR 50.36(c)(2)(ii) states: "A technical specification limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the following criteria:

"(A) *Criterion 1.* Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary."

The San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 & 3) Fuel Handling Isolation Signal (FHIS) instrumentation is used to detect airborne radioactivity resulting from a FHA-FHB, not to detect a degradation of the reactor coolant pressure boundary.

"(B) *Criterion 2.* A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier."

The SONGS 2 & 3 FHIS and FHB PACFS represent systems and not process variables, design features, or operating restrictions.

"(C) *Criterion 3.* A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier."

The SONGS 2 & 3 FHIS and PACFS are designed to mitigate the consequences of fuel rod failures caused by a fuel handling accident inside the FHB (FHA-FHB). The fuel rods are fission product barriers. However, the licensee has shown that the consequences of a postulated FHA-FHB are acceptable without credit for operation of the FHIS and PACFS. Therefore, the FHIS and PACFS are not part of the primary success path for accident response.

"(D) *Criterion 4.* A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety."

The licensee has shown that the FHIS and PACFS are not significant to public health and safety because these systems are not needed to mitigate the consequences of a FHA-FHB. Testing of the PACFS under the Ventilation Filter Testing Program is not required.

Therefore, the SONGS 2 & 3 FHIS and PACFS do not meet any of the four regulatory criteria for inclusion in the Technical Specifications and may be deleted from the Technical Specifications.

5.2.2 10 CFR 100.11, "Determination of exclusion area, low population zone, and population center distance" [for Stationary Power Reactor Site Applications Before January 10, 1997]

10 CFR 100.11(a) sets forth guidelines for the exposure of individuals at the boundaries of the exclusion area and low population zone to radiation released from hypothetical accidents at nuclear power plants. For the FHA-FHB at SONGS 2 & 3, analysis shows that these guidelines are met without any mitigation from the FHIS and PACFS. Therefore, deletion of the FHIS and PACFS from the SONGS 2 & 3 Technical Specifications would have no affect on individuals so exposed.

5.2.3 10 CFR 50, Appendix A, "General Design Criteria for Nuclear Power Plants"

General Design Criterion 19 – Control room

General Design Criterion 19 requires adequate radiation protection to permit access and occupancy of the control room under accident conditions, and sets forth dose limits for control room personnel for the duration of an accident. For the FHA-FHB at SONGS 2 & 3, analysis shows that these limits are met without any mitigation from

the FHIS and PACFS. Therefore, deletion of the FHIS and PACFS from the SONGS 2 & 3 Technical Specifications and discontinuation of PACFS filter testing would have no affect on personnel so exposed.

General Design Criterion 61 – Fuel storage and handling and radioactivity control

General Design Criterion 61 requires fuel storage and handling systems to be designed with appropriate containment, confinement and filtering systems. The proposed change would not implement design modifications to the FHIS and PACFS. Specifically, Southern California Edison does not plan to physically remove the filters or charcoal adsorbers from the PACFS design. The LCS will continue to require the surveillances currently contained in SRs 3.3.10.1, 3.3.10.2, 3.3.10.3, 3.3.10.4, 3.3.10.5, 3.7.14.1 and 3.7.14.3. The FHB airborne radiation monitors 2(3)RE7822G1 and 2(3)RE7823G2 will continue to provide for the automatic isolation of the FHB Ventilation System.

Moreover, for the FHA-FHB at SONGS 2 & 3, analysis has shown that regulatory limits and guidelines are met without any mitigation from the FHIS and PACFS. Therefore, deletion of the FHIS and PACFS from the SONGS 2 & 3 Technical Specifications would have no affect on "appropriate" system design.

5.2.4 Regulatory Requirements/Criteria Conclusion

In conclusion, based on the considerations discussed above, (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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

7.1 San Onofre Nuclear Generating Station (SONGS) 2 & 3, Updated Final Safety Analysis Report.

7.2 Regulatory Guide 1.25, "Assumptions Used for Evaluating the Potential Radiological Consequences of Fuel Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors," 1972.

7.3 NUREG-0800, US NRC Standard Review Plan Section 6.4.

7.4 NUREG-0800, US NRC Standard Review Plan Section 15.7.4.

7.5 Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Plants," July 2000.

7.6 Regulatory Guide 1.195, "Methods and Assumptions for Evaluating Radiological Consequences of Design Basis Accidents at Light-Water Nuclear Power Reactors," May 2003.

7.7 SCE Letter to U.S. Nuclear Regulatory Commission, "Docket Nos. 50-361 and 50-362, Response to Generic Letter 2003-01, 'Control Room Habitability', Tracer Gas Test Results, San Onofre Nuclear Generating Station Units 2 and 3", September 17, 2004.

7.8 San Onofre Nuclear Generating Station, Units 2 and 3, Docket Nos. 50-361 and 50-362, Proposed Change Number (PCN) 555, Alternative Source Term, is a request dated December 27, 2004 for full-scope implementation of the alternative source term described in Regulatory Guide 1.183.

8.0 PRECEDENT

By letter dated November 21, 2001, NRC staff approved license amendment number 176 for the Waterford Steam Electric Station, Unit 3, to delete TS 3.9.12, "Fuel Handling Building Ventilation System," and TS 3.3.3.1 requirements for the Fuel Storage Pool area radiation monitors. (TAC No. MB2462, ADAMS accession number ML013270214)

By letter dated December 12, 2003, NRC staff approved license amendment number 248 for Three Mile Island Unit 1 to delete the TS requirements for the auxiliary and fuel handling building air treatment system. (TAC No. MB6695, ADAMS accession number ML033140383)

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ENCLOSURE 2
ATTACHMENT 2

EXISTING TECHNICAL SPECIFICATION PAGES, UNIT 2

(continued)

(continued)

(continued)

3.3 INSTRUMENTATION

3.3.10 Fuel Handling Isolation Signal (FHIS)

LCO 3.3.10 One FHIS channel shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel in the fuel handling building.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Actuation Logic, Manual Trip, or required channel of gaseous radiation monitor inoperable during movement of irradiated fuel assemblies.	A.1	Place one OPERABLE Fuel Handling Building Post Accident Cleanup System train in operation.	Immediately
	OR		
	A.2	Suspend movement of irradiated fuel assemblies in the fuel handling building.	Immediately

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.3.10.1	Perform a CHANNEL CHECK on required FHIS radiation monitor channel.	12 hours
SR 3.3.10.2	Perform a CHANNEL FUNCTIONAL TEST on required FHIS radiation monitor channel. Verify radiation monitor setpoint Allowable Values: Airborne Gaseous: ≤ 6E4 cpm above background.	92 days
SR 3.3.10.3	----------NOTE---------- Testing of Actuation Logic shall include the actuation of each initiation relay and verification of the proper operation of each initiation relay. ---------- Perform a CHANNEL FUNCTIONAL TEST on required FHIS Actuation Logic channel.	18 months
SR 3.3.10.4	Perform a CHANNEL FUNCTIONAL TEST on required FHIS Manual Trip logic.	18 months
SR 3.3.10.5	Perform a CHANNEL CALIBRATION on required FHIS radiation monitor channel.	18 months

3.7 PLANT SYSTEMS

3.7.14 Fuel Handling Building Post-Accident Cleanup Filter System

LCO 3.7.14 Two Fuel Handling Building Post-Accident Cleanup Filter System trains shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel assemblies in the fuel building.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One Fuel Handling Building Post-Accident Cleanup Filter System train inoperable.	A.1	Restore Fuel Handling Building Post-Accident Cleanup Filter System train to OPERABLE status.	7 days
B. Required Action and Associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the fuel building.	B.1	Place OPERABLE Fuel Handling Building Post-Accident Cleanup Filter System train in operation.	Immediately
	OR		
	B.2	Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately

(continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two Fuel Handling Building Post-Accident Cleanup Filter System trains inoperable during movement of irradiated fuel assemblies in the fuel building.	C.1 Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.14.1	Operate each Fuel Handling Building Post-Accident Cleanup Filter System train for ≥ 10 continuous hours with the heaters operating.	31 days
SR 3.7.14.2	Perform required Fuel Handling Building Post-Accident Cleanup Filter System filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.14.3	Verify each Fuel Handling Building Post-Accident Cleanup Filter System train actuates on an actual or simulated actuation signal.	24 months

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.11 Steam Generator Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System." The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested per the methodology of ASTM D3803-1989 at 30°C and 70% relative humidity to show acceptable methyl iodide penetration; and

d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.

Note 1: Sample and injection points shall be qualified per ANSI N510-1975 unless manifolds have been qualified per ASME N510-1989. HEPA testing will be conducted with DOP aerosol or suitable alternate.

(continued)

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ENCLOSURE 2
ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION CHANGES, UNIT 2

(continued)

(continued)

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3.3 INSTRUMENTATION

3.3.10 Fuel Handling Isolation Signal (FHIS)

LCO 3.3.10 One FHIS channel shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel in the fuel handling building.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Actuation Logic, Manual Trip, or required channel of gaseous radiation monitor inoperable during movement of irradiated fuel assemblies.	A.1 Place one OPERABLE Fuel Handling Building Post Accident Cleanup System train in operation.	Immediately
	OR	
	A.2 Suspend movement of irradiated fuel assemblies in the fuel handling building.	Immediately

~~SURVEILLANCE REQUIREMENTS~~

~~SURVEILLANCE~~		~~FREQUENCY~~
~~SR 3.3.10.1~~	~~Perform a CHANNEL CHECK on required FHIS radiation monitor channel.~~	~~12 hours~~
~~SR 3.3.10.2~~	~~Perform a CHANNEL FUNCTIONAL TEST on required FHIS radiation monitor channel. Verify radiation monitor setpoint Allowable Values:~~ ~~Airborne Gaseous: ≤ 6E4 cpm above background.~~	~~92 days~~
~~SR 3.3.10.3~~	~~NOTE~~ ~~Testing of Actuation Logic shall include the actuation of each initiation relay and verification of the proper operation of each initiation relay.~~ ~~Perform a CHANNEL FUNCTIONAL TEST on required FHIS Actuation Logic channel.~~	~~18 months~~
~~SR 3.3.10.4~~	~~Perform a CHANNEL FUNCTIONAL TEST on required FHIS Manual Trip logic.~~	~~18 months~~
~~SR 3.3.10.5~~	~~Perform a CHANNEL CALIBRATION on required FHIS radiation monitor channel.~~	~~18 months~~

3.7 PLANT SYSTEMS

3.7.14 Fuel Handling Building Post-Accident Cleanup Filter System

LCO 3.7.14 Two Fuel Handling Building Post-Accident Cleanup Filter System trains shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel assemblies in the fuel building.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Fuel Handling Building Post-Accident Cleanup Filter System train inoperable.	A.1 Restore Fuel Handling Building Post-Accident Cleanup Filter System train to OPERABLE status.	7 days
B. Required Action and Associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the fuel building.	B.1 Place OPERABLE Fuel Handling Building Post-Accident Cleanup Filter System train in operation. OR B.2 Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two Fuel Handling Building Post-Accident Cleanup Filter System trains inoperable during movement of irradiated fuel assemblies in the fuel building.	C.1 Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.14.1	Operate each Fuel Handling Building Post-Accident Cleanup Filter System train for ≥ 10 continuous hours with the heaters operating.	31 days
SR 3.7.14.2	Perform required Fuel Handling Building Post-Accident Cleanup Filter System filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.14.3	Verify each Fuel Handling Building Post-Accident Cleanup Filter System train actuates on an actual or simulated actuation signal.	24 months

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.11 Steam Generator Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems~~,~~ "Control Room Emergency Air Cleanup System."~~ and "Fuel Handling Building Post-accident Cleanup Filter System."~~ The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested per the methodology of ASTM D3803-1989 at 30°C and 70% relative humidity to show acceptable methyl iodide penetration; and

d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.

Note 1: Sample and injection points shall be qualified per ANSI N510-1975 unless manifolds have been qualified per ASME N510-1989. HEPA testing will be conducted with DOP aerosol or suitable alternate.

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ENCLOSURE 2
ATTACHMENT 4

REVISED TECHNICAL SPECIFICATION PAGES, UNIT 2

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5.5 Procedures, Programs, and Manuals (continued)

5.5.2.11 Steam Generator Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation system "Control Room Emergency Air Cleanup System." The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested per the methodology of ASTM D3803-1989 at 30°C and 70% relative humidity to show acceptable methyl iodide penetration; and

d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.

Note 1: Sample and injection points shall be qualified per ANSI N510-1975 unless manifolds have been qualified per ASME N510-1989. HEPA testing will be conducted with DOP aerosol or suitable alternate.

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ENCLOSURE 2
ATTACHMENT 5

EXISTING TECHNICAL SPECIFICATION PAGES, UNIT 3

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3.3 INSTRUMENTATION

3.3.10 Fuel Handling Isolation Signal (FHIS)

LCO 3.3.10 One FHIS channel shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel in the fuel handling building.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Actuation Logic, Manual Trip, or required channel of gaseous radiation monitor inoperable during movement of irradiated fuel assemblies.	A.1	Place one OPERABLE Fuel Handling Building Post Accident Cleanup System train in operation.	Immediately
	OR		
	A.2	Suspend movement of irradiated fuel assemblies in the fuel handling building.	Immediately

(continued)

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.3.10.1	Perform a CHANNEL CHECK on required FHIS radiation monitor channel.	12 hours
SR 3.3.10.2	Perform a CHANNEL FUNCTIONAL TEST on required FHIS radiation monitor channel. Verify radiation monitor setpoint Allowable Values: Airborne Gaseous: ≤ 6E4 cpm above background.	92 days
SR 3.3.10.3	----------NOTE---------- Testing of Actuation Logic shall include the actuation of each initiation relay and verification of the proper operation of each initiation relay. ---------- Perform a CHANNEL FUNCTIONAL TEST on required FHIS Actuation Logic channel.	18 months
SR 3.3.10.4	Perform a CHANNEL FUNCTIONAL TEST on required FHIS Manual Trip logic.	18 months
SR 3.3.10.5	Perform a CHANNEL CALIBRATION on required FHIS radiation monitor channel.	18 months

(continued)

3.7 PLANT SYSTEMS

3.7.14 Fuel Handling Building Post-Accident Cleanup Filter System

LCO 3.7.14 Two Fuel Handling Building Post-Accident Cleanup Filter System trains shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel assemblies in the fuel building.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One Fuel Handling Building Post-Accident Cleanup Filter System train inoperable.	A.1	Restore Fuel Handling Building Post-Accident Cleanup Filter System train to OPERABLE status.	7 days
B. Required Action and Associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the fuel building.	B.1	Place OPERABLE Fuel Handling Building Post-Accident Cleanup Filter System train in operation.	Immediately
	OR		
	B.2	Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately

(continued)

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two Fuel Handling Building Post-Accident Cleanup Filter System trains inoperable during movement of irradiated fuel assemblies in the fuel building.	C.1 Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.14.1	Operate each Fuel Handling Building Post-Accident Cleanup Filter System train for ≥ 10 continuous hours with the heaters operating.	31 days
SR 3.7.14.2	Perform required Fuel Handling Building Post-Accident Cleanup Filter System filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.14.3	Verify each Fuel Handling Building Post-Accident Cleanup Filter System train actuates on an actual or simulated actuation signal.	24 months

(continued)

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.11 Steam Generator (SG) Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System." The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested per the methodology of ASTM D3803-1989 at 30°C and 70% relative humidity to show acceptable methyl iodide penetration; and

d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.

Note 1: Sample and injection points shall be qualified per ANSI N510-1975 unless manifolds have been qualified per ASME N510-1989. HEPA testing will be conducted with DOP aerosol or suitable alternate.

(continued)

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ENCLOSURE 2
ATTACHMENT 6

PROPOSED TECHNICAL SPECIFICATION CHANGES, UNIT 3

(continued)

(continued)

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3.3 INSTRUMENTATION

3.3.10 Fuel Handling Isolation Signal (FHIS)

LCO 3.3.10 One FHIS channel shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel in the fuel handling building.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Actuation Logic, Manual Trip, or required channel of gaseous radiation monitor inoperable during movement of irradiated fuel assemblies.	A.1 Place one OPERABLE Fuel Handling Building Post Accident Cleanup System train in operation. OR A.2 Suspend movement of irradiated fuel assemblies in the fuel handling building.	Immediately Immediately

~~SURVEILLANCE REQUIREMENTS~~

~~SURVEILLANCE~~		~~FREQUENCY~~
~~SR 3.3.10.1~~	~~Perform a CHANNEL CHECK on required FHIS radiation monitor channel.~~	~~12 hours~~
~~SR 3.3.10.2~~	~~Perform a CHANNEL FUNCTIONAL TEST on required FHIS radiation monitor channel. Verify radiation monitor setpoint Allowable Values:~~ ~~Airborne Gaseous: ≤ 6E4 cpm above background.~~	~~92 days~~
~~SR 3.3.10.3~~	~~NOTE~~ ~~Testing of Actuation Logic shall include the actuation of each initiation relay and verification of the proper operation of each initiation relay.~~ ~~Perform a CHANNEL FUNCTIONAL TEST on required FHIS Actuation Logic channel.~~	~~18 months~~
~~SR 3.3.10.4~~	~~Perform a CHANNEL FUNCTIONAL TEST on required FHIS Manual Trip logic.~~	~~18 months~~
~~SR 3.3.10.5~~	~~Perform a CHANNEL CALIBRATION on required FHIS radiation monitor channel.~~	~~18 months~~

3.7 PLANT SYSTEMS

3.7.14 Fuel Handling Building Post-Accident Cleanup Filter System

LCO 3.7.14 Two Fuel Handling Building Post-Accident Cleanup Filter System trains shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel assemblies in the fuel building.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Fuel Handling Building Post-Accident Cleanup Filter System train inoperable.	A.1 Restore Fuel Handling Building Post-Accident Cleanup Filter System train to OPERABLE status.	7 days
B. Required Action and Associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the fuel building.	B.1 Place OPERABLE Fuel Handling Building Post-Accident Cleanup Filter System train in operation. OR B.2 Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two Fuel Handling Building Post-Accident Cleanup Filter System trains inoperable during movement of irradiated fuel assemblies in the fuel building.	C.1 Suspend movement of irradiated fuel assemblies in the fuel building.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.14.1	Operate each Fuel Handling Building Post-Accident Cleanup Filter System train for ≥ 10 continuous hours with the heaters operating.	31 days
SR 3.7.14.2	Perform required Fuel Handling Building Post-Accident Cleanup Filter System filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.14.3	Verify each Fuel Handling Building Post-Accident Cleanup Filter System train actuates on an actual or simulated actuation signal.	24 months

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.11 Steam Generator (SG) Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems~~,~~ "Control Room Emergency Air Cleanup System."~~ and "Fuel Handling Building Post-accident Cleanup Filter System."~~ The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested per the methodology of ASTM D3803-1989 at 30°C and 70% relative humidity to show acceptable methyl iodide penetration; and

d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.

Note 1: Sample and injection points shall be qualified per ANSI N510-1975 unless manifolds have been qualified per ASME N510-1989. HEPA testing will be conducted with DOP aerosol or suitable alternate.

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ENCLOSURE 2
ATTACHMENT 7

REVISED TECHNICAL SPECIFICATION PAGES, UNIT 3

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5.5 Procedures, Programs, and Manuals (continued)

5.5.2.11 Steam Generator (SG) Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation system "Control Room Emergency Air Cleanup System." The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (see Note 1); and

c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested per the methodology of ASTM D3803-1989 at 30°C and 70% relative humidity to show acceptable methyl iodide penetration; and

d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.

Note 1: Sample and injection points shall be qualified per ANSI N510-1975 unless manifolds have been qualified per ASME N510-1989. HEPA testing will be conducted with DOP aerosol or suitable alternate.

(continued)

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ENCLOSURE 2
ATTACHMENT 8

SUMMARY OF LICENSEE COMMITMENTS

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 Jack Rainsberry at 949-368-7420.

REGULATORY COMMITMENT	DUE DATE
SCE will implement the approved amendment	Within 60 days of approval of this amendment request
SCE will revise the Technical Specification (TS) Bases to delete the Bases for TS 3.3.10 and TS 3.7.14	Within 60 days of approval of this amendment request
SCE will implement a Licensee Controlled Specification (LCS) change to add the operability and functional requirements of the isolation and cleanup systems to the LCS. The required surveillances will include the current requirements to test the system operation, including automatic isolation on high radiation. In this transfer the Fuel Handling Building Post-Accident Cleanup Filter System (PACFS) Limiting Condition for Operation requirement for two operable systems will be reduced to one system operable during movement of irradiated fuel in the fuel building. Completion Times for both FHIS and PACFS inoperabilities will be revised from "Immediately" to "1 hour" to allow for orderly completion of the Required Action after discovery of inoperability. The filtration Surveillance Requirement (SR) for testing of the charcoal adsorbers and the high efficiency particulate air (HEPA) filters will be deleted. The LCS for the Fuel Handling Isolation Signal will continue to require the surveillances currently contained in SRs 3.3.10.1, 3.3.10.2, 3.3.10.3, 3.3.10.4, 3.3.10.5. The LCS for PACFS will continue to require the surveillances currently contained in SRs 3.7.14.1 and 3.7.14.3.	Within 60 days of approval of this amendment request