

ATTACHMENT 1

VOLUME 15

SAN ONOFRE NUCLEAR GENERATING STATION

IMPROVED TECHNICAL SPECIFICATIONS CONVERSION

GENERIC DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION AND ENVIRONMENTAL ASSESSMENT

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
ADMINISTRATIVE CHANGES

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve reformatting, renumbering, and rewording of Current Technical Specifications (CTS) with no change in intent. These changes, since they do not involve technical changes to the CTS, are administrative.

This type of change is connected with the movement of requirements within the current requirements, or with the modification of wording that does not affect the technical content of the CTS. These changes also include non-technical modifications of requirements to conform to TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Standard Technical Specifications," or provide consistency with the Improved Standard Technical Specifications in NUREG-1432. Administrative changes are not intended to add, delete, or relocate any technical requirements of the CTS.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change involves reformatting, renumbering, and rewording the CTS. The reformatting, renumbering, and rewording process involves no technical changes to the CTS. As such, this change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed change will not impose any new or eliminate any old requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

- 3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The proposed change will not reduce a margin of safety because it has no effect on any safety analyses assumptions. This change is administrative in nature. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
MORE RESTRICTIVE CHANGES

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve adding more restrictive requirements to the Current Technical Specifications (CTS) by either making current requirements more stringent or by adding new requirements that currently do not exist.

These changes include additional requirements that decrease allowed outage times, increase the Frequency of Surveillances, impose additional Surveillances, increase the scope of Specifications to include additional plant equipment, increase the Applicability of Specifications, or provide additional actions. These changes are generally made to conform to NUREG-1432 and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change provides more stringent Technical Specification requirements for the facility. These more stringent requirements do not result in operations that significantly increase the probability of initiating an analyzed event, and do not alter assumptions relative to mitigation of an accident or transient event. The more restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed change does impose different Technical Specification requirements. However, these changes are consistent with the assumptions in the safety analyses and licensing basis. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

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

Response: No.

The imposition of more restrictive requirements either has no effect on or increases the margin of plant safety. As provided in the discussion of change, each change in this category is, by definition, providing additional restrictions to enhance plant safety. The change maintains requirements within the safety analyses and licensing basis. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
RELOCATED SPECIFICATIONS

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve relocating Current Technical Specification (CTS) Limiting Conditions for Operations (LCOs) to licensee controlled documents.

SCE has evaluated the CTS using the criteria set forth in 10 CFR 50.36. Specifications identified by this evaluation that did not meet the retention requirements specified in the regulation are not included in the ITS. These specifications have been relocated from the CTS to either the Licensee Controlled Specification (LCS), which is currently incorporated by reference into the Updated Final Safety Analysis Report (UFSAR) or the UFSAR.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change relocates requirements and Surveillances for structures, systems, components, or variables that do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications as identified in the Application of Selection Criteria to the SONGS Technical Specifications. The affected structures, systems, components or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirements and Surveillances for these affected structures, systems, components, or variables will be relocated from the CTS to the LCS, which is currently incorporated by reference into the UFSAR, thus it will be maintained pursuant to 10 CFR 50.59. The UFSAR is subject to the change control provisions of 10 CFR 50.59 and 10 CFR 50.71(e). In addition, the affected structures, systems, components, or variables are addressed in existing surveillance procedures which are also controlled by 10 CFR 50.59, and are subject to the change control provisions imposed by plant administrative procedures, which endorse applicable regulations and standards. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or change in the methods governing normal plant operation. The proposed change will not impose or eliminate any requirements, and adequate control of existing requirements will be maintained. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The proposed change will not reduce a margin of safety because it has no significant effect on any safety analyses assumptions, as indicated by the fact that the requirements do not meet the 10 CFR 50.36 criteria for retention. In addition, the relocated requirements are moved without change, and any future changes to these requirements will be evaluated per 10 CFR 50.59.

NRC prior review and approval of changes to these relocated requirements, in accordance with 10 CFR 50.92, will no longer be required. This review and approval does not provide a specific margin of safety that can be evaluated. However, the proposed change is consistent with NUREG-1432, issued by the NRC, which allows revising the CTS to relocate these requirements and Surveillances to a licensee controlled document. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS GENERIC CHANGES

10 CFR 50.92 EVALUATION FOR REMOVED DETAIL CHANGES

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve moving details out of the Current Technical Specifications (CTS) and into the Technical Specifications Bases, the Updated Final Safety Analysis Report (UFSAR), the Containment Leakage Rate Testing (CLRT) Program, the Licensee Controlled Specifications (LCS), or other documents under regulatory control, such as the Offsite Dose Calculation Manual (ODCM), the Quality Assurance Program (QAP), the Inservice Testing (IST) Program, the Inservice Inspection (ISI) Program, and the Surveillance Frequency Control Program (SFCP). The removal of this information is considered to be less restrictive because it is no longer controlled by the Technical Specification change process. Typically, the information moved is descriptive in nature and its removal conforms to NUREG-1432 for format and content.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change relocates certain details from the CTS to other documents under regulatory control. The Technical Specification Bases and the LCS, which is currently incorporated by reference into the UFSAR, will be maintained in accordance with 10 CFR 50.59. In addition to 10 CFR 50.59 provisions, the Technical Specification Bases are subject to the change control provisions in the Administrative Controls Chapter of the ITS. The UFSAR is subject to the change control provisions of 10 CFR 50.59 and 10 CFR 50.71(e). Other documents are subject to controls imposed by the ITS or other regulations. Since any changes to these documents will be evaluated, no significant increase in the probability or consequences of an accident previously evaluated will be allowed. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operations. The proposed change will not impose or

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

eliminate any requirements, and adequate control of the information will be maintained. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. In addition, the details to be moved from the CTS to other documents are not being changed. Since any future changes to these details will be evaluated under the applicable regulatory change control mechanism, no significant reduction in a margin of safety will be allowed. A significant reduction in the margin of safety is not associated with the elimination of the 10 CFR 50.90 requirement for NRC review and approval of future changes to the relocated details. Not including these details in the Technical Specifications is consistent with NUREG-1432, issued by the NRC, which allows revising the Technical Specifications to relocate these requirements and Surveillances to a licensee controlled document controlled by 10 CFR 50.59, 10 CFR 50.71(e), or other Technical Specification controlled or regulation controlled documents. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 1
RELAXATION OF LCO REQUIREMENTS

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve relaxation of the Current Technical Specification (CTS) Limiting Conditions for Operation (LCOs) by the elimination of specific items from the LCO or Tables referenced in the LCO, or the addition of exceptions to the LCO.

These changes reflect the Standard Technical Specifications (ISTS) approach to provide LCO requirements that specify the protective conditions that are required to meet safety analysis assumptions for required features. These conditions replace the lists of specific devices used in the CTS to describe the requirements needed to meet the safety analysis assumptions. The ITS also includes LCO Notes which allow exceptions to the LCO for the performance of testing or other operational needs. The ITS provides the protection required by the safety analysis, and provides flexibility for meeting the conditions without adversely affecting operations since equivalent features are required to be OPERABLE. The ITS is also consistent with the plant current licensing basis, as may be modified in the discussion of individual changes. These changes are generally made to conform with NUREG-1432, and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change provides less restrictive LCO requirements for operation of the facility. These less restrictive LCO requirements do not result in operation that will significantly increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event in that the requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the current safety analyses and licensing basis. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The proposed change does impose different requirements. However, the change is consistent with the assumptions in the current safety analyses and licensing basis. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

The imposition of less restrictive LCO requirements does not involve a significant reduction in the margin of safety. As provided in the discussion of change, this change has been evaluated to ensure that the current safety analyses and licensing basis requirements are maintained. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 2
RELAXATION OF APPLICABILITY

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve relaxation of the applicability of Current Technical Specification (CTS) Limiting Conditions for Operation (LCOs) by reducing the conditions under which the LCO requirements must be met.

CTS requirements are being eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing its intended safety function. Deleting applicability requirements that are indeterminate or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the ITS may be satisfied by exiting the applicability which takes the plant out of the conditions that require the safety system to be OPERABLE.

This change provides the protection required by the safety analyses, and provides flexibility for meeting limits by restricting the application of the limits to the conditions assumed in the safety analyses. The ITS is also consistent with the plant current licensing basis, as may be modified in the discussion of individual changes. The change is generally made to conform with NUREG-1432, and has been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change relaxes the conditions under which the LCO requirements for operation of the facility must be met. These less restrictive applicability requirements for the LCOs do not result in operation that will significantly increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event in that the requirements continue to ensure that process variables, structures, systems, and components are maintained in the MODES and other specified conditions assumed in the safety analyses and licensing basis. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The proposed change does impose different requirements. However, the requirements are consistent with the assumptions in the safety analyses and licensing basis. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

The relaxed applicability of LCO requirements does not involve a significant reduction in the margin of safety. As provided in the discussion of change, this change has been evaluated to ensure that the LCO requirements are applied in the MODES and specified conditions assumed in the safety analyses and licensing basis. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 3
RELAXATION OF COMPLETION TIME

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve relaxation of the Completion Times for Required Actions in the Current Technical Specifications (CTS).

Upon discovery of a failure to meet a Limiting Condition for Operation (LCO), the ITS specifies times for completing Required Actions of the associated Conditions. Required Actions of the associated Conditions are used to establish remedial measures that must be taken within specified Completion Times. These times define limits during which operation in a degraded condition is permitted. Adopting Completion Times from the ITS is acceptable because the Completion Times take into account the OPERABILITY status of the redundant systems of required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a Design Basis Accident (DBA) occurring during the repair period. In addition, the ITS provides consistent Completion Times for similar conditions. These changes are generally made to conform with NUREG-1432, and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change relaxes the Completion Time for a Required Action. Required Actions and their associated Completion Times are not initiating conditions for any accident previously evaluated, and the accident analyses do not assume that required equipment is out of service prior to the analyzed event. Consequently, the relaxed Completion Time does not significantly increase the probability of any accident previously evaluated. The consequences of an analyzed accident during the relaxed Completion Time are the same as the consequences during the existing Completion Time. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the method governing normal plant operation. The Required Actions and associated Completion Times in the ITS have been evaluated to ensure that no new accident initiators are introduced. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

The relaxed Completion Time for a Required Action does not involve a significant reduction in the margin of safety. As provided in the discussion of change, the change has been evaluated to ensure that the allowed Completion Time is consistent with safe operation under the specified Condition, considering the OPERABILITY status of the redundant systems of required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a DBA occurring during the repair period. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS GENERIC CHANGES

10 CFR 50.92 EVALUATION FOR LESS RESTRICTIVE CHANGES – CATEGORY 4 RELAXATION OF REQUIRED ACTION

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve relaxation of the Required Actions in the Current Technical Specifications (CTS).

Upon discovery of a failure to meet a Limiting Condition for Operation (LCO), the ITS specifies Required Actions to complete for the associated Conditions. Required Actions of the associated Conditions are used to establish remedial measures that must be taken in response to the degraded conditions. These actions minimize the risk associated with continued operation while providing time to repair inoperable features. Some of the Required Actions are modified to place the plant in a MODE in which the LCO does not apply. Adopting Required Actions from NUREG-1432 is acceptable because the Required Actions take into account the OPERABILITY status of redundant systems of required features, the capacity and capability of the remaining features, and the compensatory attributes of the Required Actions as compared to the LCO requirements. These changes are generally made to conform with NUREG-1432, and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change relaxes Required Actions. Required Actions and their associated Completion Times are not initiating conditions for any accident previously evaluated, and the accident analyses do not assume that required equipment is out of service prior to the analyzed event. Consequently, the relaxed Required Actions do not significantly increase the probability of any accident previously evaluated. The Required Actions in the ITS have been developed to provide appropriate remedial actions to be taken in response to the degraded condition considering the OPERABILITY status of the redundant systems of required features, and the capacity and capability of remaining features while minimizing the risk associated with continued operation. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The Required Actions and associated Completion Times in the ITS have been evaluated to ensure that no new accident initiators are introduced. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The relaxed Required Actions do not involve a significant reduction in the margin of safety. As provided in the discussion of change, this change has been evaluated to minimize the risk of continued operation under the specified Condition, considering the OPERABILITY status of the redundant systems of required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a Design Basis Accident (DBA) occurring during the repair period. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 5
DELETION OF SURVEILLANCE REQUIREMENT

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve deletion of Surveillance Requirements in the Current Technical Specifications (CTS).

The CTS require safety systems to be tested and verified OPERABLE prior to entering applicable operating conditions. The ITS eliminates unnecessary CTS Surveillance Requirements that do not contribute to verification that the equipment used to meet the Limiting Condition for Operation (LCO) can perform its required functions. Thus, appropriate equipment continues to be tested in a manner and at a frequency necessary to give confidence that the equipment can perform its assumed safety functions. These changes are generally made to conform with NUREG-1432, and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change deletes Surveillance Requirements. Surveillances are not initiators to any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The equipment being tested is still required to be OPERABLE and capable of performing the accident mitigation functions assumed in the accident analyses. As a result, the consequences of any accident previously evaluated are not significantly affected. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The remaining Surveillance Requirements are consistent with industry practice, and are considered sufficient to prevent the removal of the subject Surveillances from creating a new or different type of

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

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

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

Response: No.

The deleted Surveillance Requirements do not result in a significant reduction in the margin of safety. As provided in the discussion of change, the change has been evaluated to ensure that the deleted Surveillance Requirements are not necessary for verification that the equipment used to meet the LCO can perform its required functions. Thus, appropriate equipment continues to be tested in a manner and at a frequency necessary to give confidence that the equipment can perform its assumed safety function. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 6
RELAXATION OF SURVEILLANCE REQUIREMENT ACCEPTANCE CRITERIA

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve the relaxation of Surveillance Requirements acceptance criteria in the Current Technical Specifications (CTS).

The CTS require safety systems to be tested and verified OPERABLE prior to entering applicable operating conditions. The ITS eliminates or relaxes the Surveillance Requirement acceptance criteria that do not contribute to verification that the equipment used to meet the Limiting Condition for Operation (LCO) can perform its required functions. For example, the ITS allows some Surveillance Requirements to verify OPERABILITY under actual or test conditions. Adopting the ITS allowance for "actual" conditions is acceptable because required features cannot distinguish between an "actual" signal or a "test" signal. Also included are changes to CTS requirements that are replaced in the ITS with separate and distinct testing requirements that when combined, include OPERABILITY verification of all components required in the LCO for the features specified in the CTS. Adopting this format preference in the ITS is acceptable because Surveillance Requirements that remain include testing of all previous features required to be verified OPERABLE. Changes that provide exceptions to Surveillance Requirements to provide for variations that do not affect the results of the test are also included in this category. These changes are generally made to conform with NUREG-1432, and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change relaxes the acceptance criteria of Surveillance Requirements. Surveillances are not initiators to any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The equipment being tested is still required to be OPERABLE and capable of performing the accident mitigation functions assumed in the accident analyses. As a result, the consequences of any accident previously evaluated are not significantly affected. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The relaxed acceptance criteria for Surveillance Requirements do not result in a significant reduction in the margin of safety. As provided in the discussion of change, the relaxed Surveillance Requirement acceptance criteria have been evaluated to ensure that they are sufficient to verify that the equipment used to meet the LCO can perform its required functions. Thus, appropriate equipment continues to be tested in a manner that gives confidence that the equipment can perform its assumed safety function. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 7
RELAXATION OF SURVEILLANCE FREQUENCY

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve the relaxation of Surveillance Frequencies in the Current Technical Specifications (CTS).

CTS and ITS Surveillance Frequencies specify time interval requirements for performing Surveillance tests. Increasing the time interval between Surveillance tests in the ITS results in decreased equipment unavailability due to testing which also increases equipment availability. In general, the ITS contain Surveillance Frequencies that are consistent with industry practice or industry standards for achieving acceptable levels of equipment reliability. Adopting testing practices specified in the ITS is acceptable based on similar design, like-component testing for the system application and the availability of other ITS requirements which provide regular checks to ensure limits are met. Relaxation of Surveillance Frequency can also include the addition of Surveillance Notes which allow testing to be delayed until appropriate unit conditions for the test are established, or exempt testing in certain MODES or specified conditions in which the testing can not be performed.

Reduced testing can result in a safety enhancement because the unavailability due to testing is reduced, and reliability of the affected structure, system or component should remain constant or increase. Reduced testing is acceptable where operating experience, industry practice, or the industry standards such as manufacturers' recommendations have shown that these components usually pass the Surveillance when performed at the specified interval, thus the Surveillance Frequency is acceptable from a reliability standpoint. Surveillance Frequency changes to incorporate alternate train testing have been shown to be acceptable where other qualitative or quantitative test requirements are required that are established predictors of system performance. Surveillance Frequency extensions can be based on NRC-approved topical reports. The NRC staff has accepted topical report analyses that bound the plant-specific design and component reliability assumptions. These changes are generally made to conform with NUREG-1432, and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS GENERIC CHANGES

The proposed change relaxes Surveillance Frequencies. The relaxed Surveillance Frequencies have been established based on achieving acceptable levels of equipment reliability. Consequently, equipment that could initiate an accident previously evaluated will continue to operate as expected, and the probability of the initiation of any accident previously evaluated will not be significantly increased. The equipment being tested is still required to be OPERABLE and capable of performing any accident mitigation functions assumed in the accident analyses. As a result, the consequences of any accident previously evaluated are not significantly affected. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

The relaxed Surveillance Frequencies do not result in a significant reduction in the margin of safety. As provided in the discussion of change, the relaxation in the Surveillance Frequency has been evaluated to ensure that it provides an acceptable level of equipment reliability. Thus, appropriate equipment continues to be tested at a Frequency that gives confidence that the equipment can perform its assumed safety function when required. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 8
DELETION OF REPORTING REQUIREMENTS

Southern California Edison (SCE) is converting the San Onofre Nuclear Generating Station (SONGS) TS (developed based on NUREG-1432, Rev. 0) to Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. Some of the proposed changes involve the deletion of requirements in the Current Technical Specifications (CTS) to send reports to the NRC.

The CTS includes requirements to submit reports to the NRC under certain circumstances. However, the ITS eliminates these requirements for many such reports and, in many cases, relies on the reporting requirements of 10 CFR 50.73 or other regulatory requirements. The ITS changes to reporting requirements are acceptable because the regulations provide adequate reporting requirements, or the reports do not affect continued plant operation. Therefore, this change has no effect on the safe operation of the plant. These changes are generally made to conform with NUREG-1432, and have been evaluated to not be detrimental to plant safety.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change deletes reporting requirements. Sending reports to the NRC is not an initiator of any accident previously evaluated. Consequently, the probability of any accident previously evaluated is not significantly increased. Sending reports to the NRC has no effect on the ability of equipment to mitigate an accident previously evaluated. As a result, the consequences of any accident previously evaluated is not significantly affected. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
GENERIC CHANGES**

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

Response: No.

The deletion of reporting requirements does not result in a significant reduction in the margin of safety. The ITS eliminates the requirements for many such reports and, in many cases, relies on the reporting requirements of 10 CFR 50.73 or other regulatory requirements. The change to reporting requirements does not affect the margin of safety because the regulations provide adequate reporting requirements, or the reports do not affect continued plant operation. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change 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."

ENVIRONMENTAL ASSESSMENT

Southern California Edison (SCE) has evaluated this license amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. SCE has determined that this license amendment meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria.

- (i) The amendment involves no significant hazards consideration.

As demonstrated in the generic and specific Determination of No Significant Hazards Considerations, this proposed amendment does not involve a significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed amendment does not affect the generation of any radioactive effluents, and does not affect any of the permitted effluent release paths.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not cause radiological exposure in excess of the dose criteria for restricted and unrestricted access specified in 10 CFR 20. Individual worker exposures will be maintained within acceptable limits by the San Onofre Nuclear Generating Station (SONGS) Radiation Protection Program.

Therefore, pursuant to 10 CFR 51.22 (b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.