

ENCLOSURE 1

SONGS ITS CONVERSION SUBMITTAL CONTENTS

**AMENDMENT APPLICATIONS 260 AND 246
SAN ONOFRE NUCLEAR GENERATING STATION UNITS 2 AND 3
TECHNICAL SPECIFICATIONS CONVERSION TO NUREG-1432, REV. 3.0 PLUS
SELECTED APPROVED TRAVELERS**

Attachment 1 of the submittal for the conversion of the current Technical Specifications (CTS) to the ITS for SONGS consists of the following fifteen volumes:

Volume Title

1. ITS Chapter 1.0, Use and Application
2. ITS Chapter 2.0, Safety Limits (SLs)
3. ITS Section 3.0, Limiting Condition for Operation (LCO) Applicability and Surveillance Requirement (SR) Applicability
4. ITS Section 3.1, Reactivity Control Systems
5. ITS Section 3.2, Power Distribution Limits
6. ITS Section 3.3, Instrumentation
7. ITS Section 3.4, Reactor Coolant System (RCS)
8. ITS Section 3.5, Emergency Core Cooling Systems (ECCS)
9. ITS Section 3.6, Containment Systems
10. ITS Section 3.7, Plant Systems
11. ITS Section 3.8, Electrical Power Systems
12. ITS Section 3.9, Refueling Operations
13. ITS Chapter 4.0, Design Features
14. ITS Chapter 5.0, Administrative Controls
15. Generic Determination of No Significant Hazards Considerations and Environmental Assessment

Volumes 1 through 14

Volumes 1 through 14 provide the details and justification to support the proposed changes. Each volume corresponds to a Chapter, Section, or Specification of NUREG-1432, Rev. 3.0. Each volume contains the required information to review the conversion to ITS, and include the following:

- Individual ITS Specifications in:
 - ITS Chapter (Volumes 1, 2, and 13);
 - Section (Volume 3); or
 - Specification (Volumes 4 through 12 and 14) order.
- Relocated/Deleted CTS Specifications (if applicable); and
- ISTS Specifications not adopted in the SONGS ITS (if applicable). Note that SONGS Units 2 and 3 are digital plants, thus the Analog Specifications are not adopted and will not be included in the submittal. In addition, SONGS Units 2 and 3 are designed with an Atmospheric type of containment, so the non-Atmospheric Specifications in Section 3.6 are also not included in the submittal.

The information for each of the above three types of specifications is organized as follows:

CTS Markup and Discussion of Changes (DOCs) (applicable only to Individual ITS Specifications and Relocated/Deleted CTS Specifications)

This section contains a markup of the CTS pages, either for CTS pages associated with an Individual ITS Specification or for Relocated/Deleted CTS Specifications, and the DOCs from the CTS.

The CTS markup pages for each ITS Specification are normally in numerical order. However, more than one CTS Specification is sometimes used in the generation of an ITS Specification. In this case, the CTS pages that are the major contributor to the ITS Specification are shown first, followed by the remaining associated CTS pages in numerical order.

The left-hand margin of the CTS markup pages includes a cross-reference to the equivalent ITS requirement. The upper right-hand corner of the CTS markup pages is annotated with the ITS Specification number to which it applies. Items on the CTS markup pages that are addressed in other proposed ITS Chapters, Sections, or Specifications are annotated with a reference to the appropriate ITS Chapter, Section, or Specification.

The CTS markup pages are annotated with an alphanumeric designator to identify the differences between the CTS and the proposed ITS. The designator corresponds to a DOC, which provides the description and justification of the change. The DOCs are located directly following the associated CTS markup for each Chapter or Section (Volumes 1, 2, 3, and 13) or each Specification (Volumes 4 through 12 and 14).

Each proposed change to the CTS is classified into one of the following categories:

<u>Designator</u>	<u>Category</u>
A	ADMINISTRATIVE CHANGES - Changes to the CTS that do not result in new requirements or change operational restrictions or flexibility. These changes are supported in aggregate by a single generic NSHC.
M	MORE RESTRICTIVE CHANGES - Changes to the CTS that result in added restrictions or reduced flexibility. These changes are supported in aggregate by a single generic NSHC.
R	RELOCATED SPECIFICATIONS - Changes to the CTS that relocate specifications that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii). These changes are supported in aggregate by a single generic NSHC.
LA	REMOVED DETAIL CHANGES - Changes to the CTS that eliminate detail and relocate the detail to a licensee-controlled document. Typically, this involves details of system design and function, or procedural detail on methods of conducting a Surveillance Requirement. These changes are supported in aggregate by a single generic NSHC. In addition, the generic type of removed detail change is identified in italics at the beginning of the DOC.
L	LESS RESTRICTIVE CHANGES - Changes to the CTS that result in reduced restrictions or added flexibility. These changes are supported either in aggregate by a generic NSHC that addresses a particular category of less restrictive change, or by a specific NSHC if the change does not fall into one of the eight categories of less restrictive changes. If the less restrictive change is covered by a generic NSHC, the category of the change is identified in italics at the beginning of the DOC.

The DOCs are numbered sequentially within each letter designator for each ITS Chapter, Section, or Specification.

The CTS Bases pages are replaced in their entirety by the proposed SONGS ITS Conversion Bases, and CTS markup pages are not provided in the ITS submittal.

ISTS Markup and Justification for Deviations (JFDs) (applicable only to Individual ITS Specifications and ISTS Specifications not adopted in the SONGS ITS Conversion)

This section contains a markup of the NUREG-1432, Rev. 3.0, ISTS pages, either for ISTS pages associated with an Individual ITS Specification or ISTS Specifications not adopted in the SONGS ITS, and JFDs from the ISTS. The ISTS pages are annotated with a numeric designator to identify the differences between the ISTS and the proposed ITS. The designator corresponds to a JFD, which provides the justification for the difference. The JFDs are located directly following the associated ISTS markup for each Chapter or Section (Volumes 1, 2, 3, and 13) or each Specification (Volumes 4 through 12 and 14). The ISTS markup pages are also annotated to show the incorporation of NRC-approved generic changes (Technical Specification Task Force (TSTF) change travelers) that are applicable to the SONGS ITS.

The left-hand margin of the ISTS markup pages includes a cross-reference to the equivalent CTS requirement.

ISTS Bases Markup and JFDs (applicable only to Individual ITS Specifications and ISTS Specifications not adopted in the SONGS ITS)

This section contains a markup of the NUREG-1432, Rev. 3.0, ISTS Bases pages, either for ISTS Bases pages associated with an Individual ITS Specification or ISTS Specifications not adopted in the SONGS ITS, and JFDs from the ISTS Bases. The ISTS Bases pages are annotated with a numeric designator to identify the differences between the ISTS Bases and the proposed ITS Bases. The designator corresponds to a JFD, which provides the justification for the difference. The JFDs are located directly following the associated ISTS Bases markup for each Chapter or Section (Volumes 1, 2, 3, and 13) or each Specification (Volumes 4 through 12 and 14). The ISTS Bases markup pages are also annotated to show the incorporation of NRC-approved generic changes (TSTF change travelers) that are applicable to the SONGS ITS Bases. The volumes for ITS Chapters 1.0, 4.0, and 5.0 do not include this section, because NUREG-1432, Rev. 3.0, does not include any Bases for these Chapters.

Determination of NSHC (applicable only to Individual ITS Specifications and Relocated/Deleted CTS Specifications)

This section contains the determination in accordance with 10 CFR 50.91(a)(1) using the criteria of 10 CFR 50.92(c) to support a finding of NSHC. For those

changes covered by a generic NSHC, those generic NSHCs are located in Volume 15. For those less restrictive changes that do not fall into one of the generic less restrictive categories, a specific NSHC evaluation has been performed. Each evaluation is annotated to correspond to the DOC discussed in the NSHC. For those ITS Chapters, Sections, or Specifications for which the less restrictive DOCs all fall into a generic category, a statement that there are no specific NSHCs is provided.

Volume 15

Volume 15 contains the majority of the evaluations required by 10 CFR 50.91(a), which support a finding of No Significant Hazards Consideration (NSHC). Based on the inherent similarities in the NSHC evaluations, generic evaluations for a finding of NSHC have been written for the following categories of CTS changes:

- Administrative Changes
- More Restrictive Changes
- Relocated Specifications
- Removed Detail Changes
- Less Restrictive Changes - Category 1 - Relaxation of LCO Requirements
- Less Restrictive Changes - Category 2 - Relaxation of Applicability
- Less Restrictive Changes - Category 3 - Relaxation of Completion Time
- Less Restrictive Changes - Category 4 - Relaxation of Required Action
- Less Restrictive Changes - Category 5 - Deletion of Surveillance Requirement
- Less Restrictive Changes - Category 6 - Relaxation of Surveillance Requirement Acceptance Criteria
- Less Restrictive Changes - Category 7 - Relaxation of Surveillance Frequency
- Less Restrictive Changes - Category 8 - Deletion of Reporting Requirements

For those less restrictive changes that do not fall into one of the generic Less Restrictive Changes categories, specific NSHC evaluations have been performed and are provided in the applicable Chapter, Section, or Specification in Volumes 1 through 14.

In addition, Volume 15 contains an evaluation of environmental consideration in accordance with 10 CFR 51.21. It has been determined that the proposed license amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR

51.22(b), and no environmental impact statement or environmental assessment need be prepared in connection with the proposed license amendment.

ENCLOSURE 2

BEYOND SCOPE CHANGES

AMENDMENT APPLICATIONS 260 AND 246 SAN ONOFRE NUCLEAR GENERATING STATION UNITS 2 AND 3 TECHNICAL SPECIFICATIONS CONVERSION TO NUREG-1432, REV. 3.0 PLUS SELECTED APPROVED TRAVELERS

Beyond Scope Changes are those changes included in the Improved Technical Specifications (ITS) conversion submittal that are beyond the scope of the Improved Standard Technical Specifications (ISTS) as described in NUREG-1432, Rev. 3.0, and also beyond the scope of the SONGS Units 2 and 3 current Technical Specifications (CTS). The following is a list of the discussions of changes (DOCs) in Attachment 1 that are Beyond Scope Changes in the SONGS ITS conversion submittal:

- 1) CTS 3.1.5 includes two SRs related to CEA position indication, CTS SR 3.1.5.2 and SR 3.1.5.4. However, the LCO statement of CTS 3.1.5 does not specifically delineate position indication as being required for a CEA. It only requires OPERABILITY of a full length CEA and for all part and full length CEAs to be within the alignment limits. Furthermore, the LCO Section of the CTS 3.1.5 Bases does not describe indication as a necessary feature for the CEA to be OPERABLE. However, the CTS Bases for SR 3.1.5.2 provides a requirement that two of the three indicators for each CEA to be OPERABLE. In addition, CTS 3.1.5 does not provide any specific actions to take if one or more of the required CEA position indicators is inoperable. Consistent with the approach taken in the other PWR NUREGs (NUREGs-1430 and -1431), a new LCO has been provided for the CEA Position Indicators. (Refer to Attachment 1, Volume 4, ITS 3.1.15, DOCs A02 and L01)
- 2) The setpoint in SR 3.3.9.2 was changed from 4E2 cpm to 1.80E-5 $\mu\text{Ci/cc}$. The two values are equivalent so no technical change has resulted. This change is the result of SCE replacing the analog radiation monitor with a digital radiation monitor as approved by License Amendments 154 and 145 for Units 2 and 3 respectively. (Refer to Attachment 1, Volume 6, ITS 3.3.9, DOC A02).
- 3) The 1260 amp hour batteries have been removed from SONGS and all batteries are now the 1800 amp hour batteries. Therefore, the 1200 amp hour battery requirements are being deleted from the Technical Specifications. (Refer to Attachment 1, Volume 11, ITS 3.8.4, DOCs A02 and A05 and ITS 3.8.6, DOC A02)

Although not considered "Beyond Scope Changes" SCE has identified several changes which may require additional NRC Staff review. The following is a listing of those changes:

- 1) SCE is incorporating TSTF-422, Change in Technical Specifications End States (CE NPSD-1186). This affects multiple ITS Specifications.
- 2) SCE is incorporating TSTF-425, Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b. This affects multiple ITS Specifications.
- 3) SCE is incorporating TSTF-490, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec. (Refer to Attachment 1, Volume 7, ITS 3.4.16 DOC L01)
- 4) SCE is incorporating TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions. This affects multiple Instrumentation Section Specifications.

ENCLOSURE 3

DISPOSITION OF GENERIC CHANGES TO NUREG-1432, REV. 3.0

**AMENDMENT APPLICATIONS 260 AND 246
SAN ONOFRE NUCLEAR GENERATING STATION UNITS 2 AND 3
TECHNICAL SPECIFICATIONS CONVERSION TO NUREG-1432, REV. 3.0 PLUS SELECTED APPROVED TRAVELERS**

The following Nuclear Regulatory Commission (NRC)-approved (as of March 1, 2011) Technical Specification Task Force (TSTF) changes are adopted in whole or in part in the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Improved Technical Specifications (ITS) conversion submittal:

<u>TSTFs Adopted</u>		
<u>TSTF</u>	<u>Description of TSTF</u>	<u>ITS Section/Specification</u>
TSTF-372-A, Rev. 4	Addition of LCO 3.0.8, Inoperability of Snubbers	3.0.8
TSTF-400-A, Rev. 1	Clarify SR on Bypass of DG Automatic Trips	3.8.1 / (SR 3.8.1.13)
TSTF-412-A, Rev. 3	Provide Actions for One Steam Supply to Turbine Driven AFW/EFW Pump Inoperable	3.7.5
TSTF-422-A, Rev. 2	Change in Technical Specifications End States (CE NPSD-1186)	Multiple

<u>TSTFs Adopted</u>		
<u>TSTF</u>	<u>Description of TSTF</u>	<u>ITS Section/Specification</u>
TSTF-425-A, Rev. 3	Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b	Multiple
TSTF-439-A, Rev. 2	Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO	1.3, 3.6.6, 3.7.5, 3.8.1, and 3.8.9
TSTF-470, Rev. 0	Correct Title and References in PAM Instrumentation Bases	3.3.11 / (Table 3.3.11-1, Function #8 and Bases)
TSTF-471-A, Rev. 1	Eliminate use of term CORE ALTERATIONS in ACTIONS and Notes	1.1, 3.8.2, 3.8.5, 3.8.8, 3.8.10, 3.9.1, and 3.9.2
TSTF-475-A, Rev. 1	Control Rod Notch Testing Frequency and SRM Insert Control Rod Action	1.4
TSTF-479-A, Rev. 0	Changes to Reflect Revision of 10 CFR 50.55a	Specification 5.5.2.10 Bases 3.4.10, 3.4.14, 3.5.2, 3.6.6, 3.7.1, 3.7.2, 3.7.3, 3.7.5, and 3.8.1
TSTF-482-A, Rev. 0	Correct LCO 3.0.6 Bases	3.0.6 (Bases only)
TSTF-485-A, Rev. 0	Correct Example 1.4-1	1.4

<u>TSTFs Adopted</u>		
<u>TSTF</u>	<u>Description of TSTF</u>	<u>ITS Section/Specification</u>
TSTF-486-A, Rev. 2	Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)	3.1.4
TSTF-490-A, Rev. 0	Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec	1.1 and 3.4.16
TSTF-491-A, Rev. 2	Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications	3.7.2 and 3.7.3
TSTF-493-A, Rev. 4	Clarify Application of Setpoint Methodology for LSSS Functions	3.3.1, 3.3.5, 3.3.7, 3.3.8, and 3.3.9
TSTF-494, Rev. 1	Correct Bases Discussion of Figure B3.0-1 (Note that since this is a "T" traveler, a plant specific justification was provided.	3.0 (Bases only)
TSTF-497-A, Rev. 0	Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less	5.5.2.10
TSTF-501-A, Rev. 1	Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control	3.8.3
TSTF-513-A, Rev. 3	Revise PWR Operability Requirements and Actions for RCS Leakage Instrumentation	3.4.15

The following Nuclear Regulatory Commission (NRC)-approved (as of March 1, 2011) Technical Specification Task Force (TSTF) changes have previously been adopted into the SONGS Units 2 and 3 Technical Specifications.

<u>TSTF</u>	<u>Description of TSTF</u>	<u>Amendment Numbers (U2/U3)</u>
TSTF-369-A, Rev. 1	Removal of Monthly Operating Report and Occupational Radiation Exposure Report	195/186
TSTF-448-A, Rev. 3	Control Room Habitability	250/235
TSTF-449-A, Rev. 4	Steam Generator Tube Integrity	240/224
TSTF-487-A, Rev. 1	Relocate DNB Parameters to the COLR	251/237
TSTF-511-A, Rev. 0	Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26	255/241

The following NRC-approved (as of March 1, 2011) TSTF changes have not been included in the SONGS Units 2 and 3 ITS conversion submittal:

<u>TSTFs Approved - Not Adopting</u>		
<u>TSTF</u>	<u>Description of TSTF</u>	<u>Reason for Not Adopting</u>
TSTF-373-A, Rev. 2	Increase CIV Completion Time in accordance with CE-NPSD-1168	SONGS has approved, plant specific Completion Times.
TSTF-427-A, Rev. 2	Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY.	SCE has decided not to incorporate this new LCO 3.0.9 allowance.