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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

October 3, 2008

Mr. Ross T. Ridenoure
Senior Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 –
SITE-SPECIFIC IMPLEMENTATION OF B.5.B PHASE 2 AND 3 MITIGATING
STRATEGIES TEMPORARY INSTRUCTION INSPECTION (NRC INSPECTION
REPORT 05000361/2008007 AND 05000362/2008007)

Dear Mr. Ridenoure:

On August 22, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed a site-specific implementation of B.5.b, Phase 2 and 3, temporary instruction team inspection of your San Onofre Nuclear Generating Station, Units 2 and 3. The enclosed report documents the team's results, which were discussed on August 22, 2008, with Mr. A. Hochevar and other members of your staff.

The inspection examined activities conducted under your license as they relate to the implementation of B.5.b, Phase 2 and 3, mitigating strategies, your compliance with the Commission's rules and regulations, and with the condition of your operating license. Within these areas, the inspection involved examination of selected procedures and records, observation of activities, and interviews with station personnel.

Based on the results of this inspection, no findings of significance were identified.

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Sincerely,

/RA/

Ryan E. Lantz, Chief
Operations Branch
Division of Reactor Safety

Dockets: 50-361; 50-362
Licenses: NPF-10; NPF-15

Nonpublic Enclosure:
Inspection Report 05000361/2008007; 05000362/2008007
w/Attachment: Supplemental Information

cc w/o enclosure:
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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 50-361, 50-362

Licenses: NPF-10, NPF-15

Report No.: 05000361/2008007; 05000362/2008007

Licensee: Southern California Edison Co. (SCE)

Facility: San Onofre Nuclear Generating Station, Units 2, 3

Location: 5000 S. Pacific Coast Hwy.
San Clemente, California

Dates: August 18-22, 2008

Inspectors: C. Osterholtz, Senior Resident Inspector, Projects Branch D
M. Parker, Senior Engineer, Office of Nuclear Reactor Regulation
M. Baquera, Reactor Inspector, Projects Branch D,

Approved By: Ryan E. Lantz, Chief
Operations Branch
Division of Reactor Safety

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SUMMARY OF FINDINGS

IR 05000361/2008007 and 05000362/2008007; 08/18/2008 - 08/22/2008; San Onofre Nuclear Generating Station; Temporary Instruction 2515/171, "Verification of Site Specific Implementation of B.5.b Phase 2 and 3 Mitigating Strategies."

This report covered a 5-day announced inspection in accordance with Temporary Instruction 2515/171, "Verification of Site Specific Implementation of B.5.b Phase 2 and 3 Mitigating Strategies." The inspection was conducted by a Region IV senior resident inspector, a Office of Nuclear Reactor Regulation inspector, and assistance was provided by one acting NRC site resident inspector. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations

No findings of significance were identified.

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Report Details

4. Other Activities

4OA5 Other Activities (Temporary Instruction 2515/171)

The objective of Temporary Instruction 2515/171, "Verification of Site-Specific Implementation of B.5.b Phase 2 & 3 Mitigating Strategies," is to verify that the commitments for implementing the Phase 2 and 3 strategies were completed by the licensee. The strategies for pressurized water reactors, such as San Onofre Nuclear Generating Station, are listed in Table 1 of the temporary instruction. Inspection of all strategies listed in Table 1 was necessary to complete this temporary instruction. The team discussed the strategies with plant staff, reviewed documentation, and, where appropriate, performed plant walk downs to evaluate whether the strategies could be implemented as stated in the licensee's submittals and the NRC safety evaluation report. For most strategies, this included verification that the strategy was feasible, procedures, and/or guidance had been developed, training had been provided to plant staff, and required equipment had been identified and staged. Specific details of the inspection activities are described below in the following sections.

.1 Program Reviews

a. Inspection Scope

Procedures: The team examined and discussed with various plant personnel all of the station's established guidelines and implementing procedures for the B.5.b mitigation strategies. The team assessed how the licensee coordinated and documented the interface and transition between existing off-normal and emergency operating procedures with the newly developed mitigation strategies. The team selected a number of mitigation strategies and conducted plant walk downs with equipment operators and licensed operators to examine the adequacy and completeness of the procedures; the familiarity of the operators with the procedure objectives and specific guidance; the staging and compatibility of equipment; and the practicality of the operator actions prescribed by the procedures, consistent with the postulated scenarios. The team also examined San Onofre Nuclear Generating Station's plans and guidance associated with coordination [REDACTED]

[REDACTED] coincident with implementation of the B.5.b mitigation strategies.

Engineering Evaluations and Calculations: The team reviewed the licensee's supporting engineering evaluations and calculations prepared as the basis to provide assurance that the [REDACTED]

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(b)(7)(F)

by Nuclear Energy Institute 06-12, "B.5.b Phase 2 & 3 Submittal Guideline," Revision 2, dated December 2006. The team discussed these calculations and evaluations with the responsible engineers, independently reviewed the adequacy of selected calculations and engineering assumptions, and conducted field verifications to compare the assumed configurations with the as-found and postulated bounding configurations.

(b)(7)(F)

Maintenance and Testing of Equipment: The team reviewed licensee plans and programs for periodic maintenance and testing of the equipment specified for B.5.b applications to ensure continued reliability and minimum unavailability.

(b)(7)(F)

b. Findings

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No findings of significance were noted.

(b)(7)(F)

.2 Individual Strategy Reviews

.2.1 (b)(7)(F)

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a. Inspection Scope

Through discussions with plant staff, review of documentation, and plant walk downs, the team examined the following areas of interest:

(b)(7)(F)

- Adequacy of guidance provided in the plant procedure(s)
- Adequacy of training provided to staff

b. Findings

No findings of significance were identified.

.2.2

(b)(7)(F)

a. Inspection Scope

Through discussions with plant staff, review of documentation, and plant walk downs, the team examined the following areas of interest:

(b)(7)(F)

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(b)(7)(F)

b. Findings

No findings of significance were identified. However,

(b)(7)(F)

.2.3

(b)(7)(F)

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a. Inspection Scope

Through discussions with plant staff, review of documentation, and plant walk downs, where appropriate, the team examined the following areas of interest:

(b)(7)(F)

- Adequacy of training and procedure guidance

b. Findings

No findings of significance were identified.

.2.4

(b)(7)(F)

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(b)(7)(F)

a. Inspection Scope

Through review of documentation, the team verified that these "Additional Site-Specific Strategies" were viable.

b. Findings

No findings of significance were identified.

.2.5

(b)(7)(F)

a. Inspection Scope

Through discussions with plant staff and review of documentation, the team verified that San Onofre Nuclear Generating Station had identified

(b)(7)(F)

b. Findings

No findings of significance were identified.

.2.6

(b)(7)(F)

a. Inspection Scope

Through discussions with plant staff and review of documentation, the team verified that San Onofre Nuclear Generating Station has the ability for

(b)(7)(F)

b. Findings

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No findings of significance were identified.

.2.7 (b)(7)(F)

a. Inspection Scope

Through discussions with plant staff and review of documentation, the team verified that San Onofre Nuclear Generating Station had

(b)(7)(F)

The team also verified that training had been provided to the appropriate staff.

b. Findings

No findings of significance were identified.

.2.8

(b)(7)(F)

a. Inspection Scope

Through discussions with plant staff and review of documentation, the team verified that San Onofre Generating Station had

(b)(7)(F)

The team verified that training has been developed and provided to the plant staff.

b. Findings

No findings of significance were identified. However, the team observed that

(b)(7)(F)

.2.9 (b)(7)(F)

a. Inspection Scope

Through discussions with plant staff and review of documentation, the team verified that San Onofre Nuclear Generating Station had

(b)(7)(F)

The team also verified training had been developed and provided to the plant staff.

b. Findings

No findings of significance were noted.

.2.10 (b)(7)(F)

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs where appropriate, the team examined the following areas of interest:

- (b)(7)(F)
-
-
-

- Adequacy of training and procedure guidance

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b. Findings

No findings of significance were identified.

.2.11 (b)(7)(F)

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs where appropriate, the team examined the following areas of interest:

- (b)(7)(F)

-

-

- Adequacy of training

b. Findings

No findings of significance were identified. However, the team did make the following observation regarding the (b)(7)(C)

(b)(7)(F)

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(b)(7)(F)

.2.12

(b)(7)(F)

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs, where appropriate, the team examined the following areas of interest:

- (b)(7)(F)
-
- Adequacy of training and procedure guidance

b. Findings

No findings of significance were identified. However, the team noted that

(b)(7)(F)

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.2.13

(b)(7)(F)

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs, where appropriate, the team examined the following areas of interest:

- (b)(7)(F)

-

-

-

-

- Adequacy of training

b. Findings

No findings of significance were identified. However, the team did make the following observation regarding the (b)(7)(F)

(b)(7)(F)

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(b)(7)(F)

.2.14

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs, where appropriate, the team examined the following areas of interest:

(b)(7)(F)

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- (b)(7)(F)
 -
- Adequacy of training and procedure guidance

b. Findings

No findings of significance were identified. However, the team did make the following observation regarding (b)(7)(F)

(b)(7)(F)

.2.15 (b)(7)(F)

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs, where appropriate, the team examined the following areas of interest:

- (b)(7)(F)
-
-
-

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- Equipment (valves, etc.) required to be operated to implement this strategy have been identified
- Adequacy of training and procedure guidance

b. Findings

No findings of significance were identified. However, the team did make the following observation regarding (b)(7)(C):

(b)(7)(F)

.2.16

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walk downs, where appropriate, the team examined the following areas of interest:

- (b)(7)(F)
-

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- (b)(7)(F)

-

-

-

-

- Adequacy of training

b. Findings

No findings of significance were identified.

- 2.17 Disposition of Site Specific Enhancement Strategies: Additional readily available measures and candidate enhancement strategies described in the safety evaluation report were documented by the licensee and reviewed by the staff. For those strategies determined to be viable, the licensee developed procedures and conducted training on their use.

a. Inspection Scope

(b)(7)(F)

(b)(7)(F)

A total of (b)(7)(F) mitigation strategies are identified. (b)(7)(F) are identified as implemented. The remaining (b)(7)(F) were to be listed for reference in appropriate guidance documents. The team sampled the (b)(7)(F) and confirmed that they were in fact either (b)(7)(F) or (b)(7)(F).

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b. Findings

No findings of significance were identified.

4OA6 Meetings, Including Exit

Exit Meeting Summary

On August 22, 2008, the team presented the preliminary inspection results to Mr. A. Hochevar and other San Onofre Nuclear Generating Station personnel. The team stated that they had reviewed proprietary information during the inspection and verified that all material had been returned to the licensee. The licensee acknowledged the inspection results as presented.

ATTACHMENT: SUPPLEMENTAL INFORMATION

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SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

R. Ridenoure, Vice President, Nuclear Generation
B. Ashbrook, Manager, Emergency Preparedness
D. Axline, Technical Specialist, Nuclear Regulatory Affairs
B. Corbett, Manager, Performance Improvement
J. Dahl, Manager, Design and Procedure Review
D. Ensminger, Manager, Fire Protection Services
J. Fee, Manager, Emergency Preparedness
S. Gardner, Engineer, Nuclear Regulatory Affairs
J. Hirsch, Manager, Maintenance
K. Johnson, Manager, Design Engineering
M. Johnson, Manager, Support Services
L. Kelly, Engineer, Nuclear Regulatory Affairs
M. Kelly, Engineer, Nuclear Regulatory Affairs
M. McBrearty, Compliance Engineer, Nuclear Regulatory Affairs
D. Pilmer, Project Manager, Nuclear Regulatory Affairs
N. Quigley, Manager, Mechanical/Nuclear Maintenance Engineering
J. Reilly, Vice-President, Engineering and Technical Services
R. Richter, Engineering Supervisor, Fire Protection
S. Root, Project Manager, Nuclear Regulatory Affairs
A. Scherer, Manager, Nuclear Regulatory Affairs
A. R. Shean, Manager, Nuclear Oversight
R. St. Onge, Manager, Maintenance and Systems Engineering
D. Pilmer, Project Manager, Nuclear Regulatory Affairs
K. K. Strand, Manager, Site Emergency Preparedness
T. Vogt, Manager, Special Projects
K. Wells, Engineer, NSSS Systems
D. Wilcoxin, Manager, Operations Training
C. Williams, Manager, Compliance
T. Yackle, Manager, Operations

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LIST OF DOCUMENTS REVIEWED

Calculations

CALCULATION	TITLE	REVISION
(b)(7)(F)		

A-2

Attachment

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Procedures

PROCEDURE	TITLE	REVISION
(b)(7)(F)		

A-3

Attachment

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PROCEDURE

TITLE

REVISION

(b)(7)(F)

Drawings and Diagrams

DRAWING

TITLE

REVISION

(b)(7)(F)

A-4

Attachment

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DRAWING

TITLE

REVISION

(b)(7)(F)

A-5

Attachment

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DRAWING

TITLE

REVISION

(b)(7)(F)

Notifications

(b)(7)(F)

Other Documents

(b)(7)(F)

SO123-0-A1, "Conduct of Operations", Revision 14

A-6

Attachment

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