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SUBJECT: Forwards revs to Amend Application 21 to License NPF-10,
 requesting addition of license condition for integrated
 living schedule. Corrections replaced word backfit w/plant
 capital mods, to avoid confusion.

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Attention: Mr. George W. Knighton, Director
PWR Project Directorate No. 7
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Gentlemen:

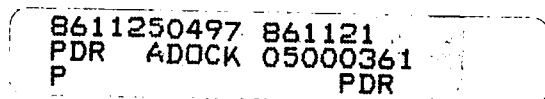
Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Reference: Letter, Mr. K. P. Baskin (SCE) to Mr. H. R. Denton, dated
August 28, 1986

The referenced letter transmitted Amendment Application No. 35 to Facility Operating License NPF-10 and Amendment Application No. 21 to Facility Operating License NPF-15 for SONGS 2 and 3, respectively. The amendment application included proposed change NPF-10/15-218. This proposed change was a request to add a new license condition for an Integrated Living Schedule (ILS). The proposed license condition and the supporting documentation made repeated reference to the term "backfits." Based upon telephone conversation with Mr. Rood, use of this term could create potential confusion with respect to 10 CFR 50.109 terminology. It was requested that SCE resubmit the proposed change utilizing a term different from backfits when referring generically to the schedules' inclusion of plant capital modifications. Accordingly, please find enclosed the revised request and supporting documentation with the term "backfit" replaced with the words "plant capital modifications." It is anticipated that this editorial change will address the expressed concerns.

If you have any further questions, please contact me.

Very truly yours,



M. O. Medford
for M. O. Medford

Manager of Nuclear Engineering
and Licensing

BRD:7720F

cc: Mr. H. Rood, NRC Project Manager
Mr. F. R. Huey, USNRC Senior Resident Inspector

bcc: (See attached sheet)

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DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-218

This is a request to add a new license condition relating to an Integrated Living Schedule (ILS) for plant capital modifications.

Existing License Conditions

No existing license condition

Proposed License Condition:

Unit 2: 2.C(26) "Integrated Living Schedule for Plant Capital Modifications"

The Southern California Edison Company (SCE) shall implement and maintain in effect the "Integrated Living Schedule Program Plan" ("The Plan") to be used for scheduling of plant capital modifications. The Plan shall be followed from and after the effective date of this amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedures. Changes to dates for completion of items identified in Schedules B or C do not require a license amendment.

Unit 3: 2.C(27) "Integrated Living Schedule for Plant Capital Modifications"

The Southern California Edison Company (SCE) shall implement and maintain in effect the "Integrated Living Schedule Program Plan" ("The Plan") to be used for scheduling of plant capital modifications. The Plan shall be followed from and after the effective date of this amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedures. Changes to dates for completion of items identified in Schedules B or C do not require a license amendment.

Description

The proposed license condition will establish the methodology to be used to determine the schedule for implementation of NRC required plant capital modifications for SONGS Units 2 and 3. The proposed license condition and The Plan (see Attachment "A") are consistent with the recommendations of Generic Letter 83-20 "Integrated Living Schedule for Implementation of Plant Modifications," which was dated May 9, 1983.

The establishment of The Plan will allow the implementation of NRC mandated plant capital modifications in a stable and controlled manner with the implementation of projects with the greatest potential for enhancing safety generally given highest priority. The Plan considers limited outage time and financial and manpower resources, while at the same time, considering implementation of plant capital modifications with the greatest safety significance. The Plan will establish three implementation schedules. Schedule A will include all items which have implementation dates required by NRC rules, orders or license conditions. Schedule B will include regulatory items of either generic or plant-specific origin which have been identified by the NRC and which SCE has agreed to implement. Schedule B will also include items perceived by SCE to be prospective NRC requirements and major projects mandated by regulatory agencies other than the NRC. Schedule C will include plant betterment items which enhance plant availability and safety that are identified and scheduled by SCE.

The proposed license condition will require SCE to establish and maintain The Plan. Regulatory required plant capital modifications will continue to be accomplished in the schedules specified by NRC rules, orders and license conditions. The establishment of The Plan and license condition does not allow mandated dates for completion of plant capital modifications (i.e., Schedule A) to be changed without NRC approval in accordance with NRC regulations. The Plan merely provides an administrative means for tracking and identifying scheduler implications of future regulatory items.

Safety Analysis

The proposed change described above shall be deemed to involve significant hazards considerations if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

The proposed change establishes an administrative means for tracking and scheduling NRC required plant modifications and licensee commitments. It does not affect the plant configuration nor NRC mandated schedules for implementation of modifications. Because the proposed license condition does not affect the plant configuration, no accident analyses are affected; therefore, the proposed change does not increase the probability or consequences of any previously evaluated accident.

2. Will operation of the facility in accordance with this proposed change create the probability of a new or different kind of accident from any accident previously evaluated.

Response: No

The proposed change will not alter the configuration of the plant or its operation; therefore, the proposed change does not create a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change is administrative and does not affect any accident analyses or involve any modification to the plant configuration; therefore, the proposed change does not involve a reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (1) relates to a purely administrative change; for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. The proposed change adds a new license condition requiring the establishment and maintenance of The Plan. The proposed change is administrative since this license condition will merely require that NRC mandated plant modifications and SCE commitments involving capital projects be tracked and scheduled. The license condition will not allow changes to be made to NRC mandated implementation dates without following existing NRC regulations for changes. Therefore, the proposed change is administrative in nature and similar to Example (1).

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT "A"

INTEGRATED LIVING SCHEDULE PROGRAM PLAN

INTEGRATED LIVING SCHEDULE PROGRAM PLAN
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

I. INTRODUCTION

This document provides the methodology to be used in determining the implementation schedule for regulatory required capital projects at San Onofre Units 2 and 3.

The program has as its goal the implementation of capital backfits in a stable, controlled manner with the implementation of projects with the greatest potential for enhancing the safe operation of the unit generally given highest priority. Projects of regulatory origin will be ranked using the Westinghouse Analytical Ranking Process to specifically determine the relative potential safety contribution of each plant capital modification. The safety ranking will then be used as a primary criterion in scheduling the projects.

The program reflects limited outage time, financial and manpower resources, while at the same time implementing those capital projects deemed necessary for enhanced plant safety. The plan provides for integration of all future regulatory required work into one comprehensive schedule and has built-in mechanisms for changes to the schedule when new modifications are identified or when key program milestones cannot be achieved due to considerations beyond the control of SCE.

II. SUMMARY OF PRIORITY DETERMINATION

The Integrated Living Schedule (ILS) is based on a priority determination to assist in maximizing the benefit derived from regulatory required capital projects. Since it is not always possible or beneficial to try to implement a large number of capital projects in a single outage, the ILS provides a mechanism for focusing attention on those projects of highest priority.

Regulatory related projects will be ranked using the Westinghouse Analytical Ranking Process. This process was approved for San Onofre Unit 1 by the NRC in their letter from D. G. Eisenhut, NRC, to K. P. Baskin, SCE, dated November 16, 1983. SCE will use the same methodology for SONGS 2 and 3. A description of the Westinghouse process was submitted to the NRC by letter dated September 2, 1983 from Kenneth P. Baskin to H. R. Denton.

III. SCHEDULING

Once the projects have been ranked they will be scheduled using normal scheduling methods. The projects ranked highest will first be evaluated to determine whether they can be implemented during the next scheduled refueling outage. Projects will continue to be selected from the top of the ranked lists and scheduled for the earliest outage in which

implementation constraints of a normal refueling outage have not been exceeded. These schedules will then be separated into three lists as described below:

Schedule A

All items which have implementation dates required by NRC Rules, Orders or License Conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have specific plant capital modifications identified and which SCE has agreed to implement, or items perceived by SCE as prospective NRC requirements, or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major NRC initiated issues that are necessary either to determine the effect of a generic issue or to determine any actions (plant capital modification or otherwise) necessary to resolve an NRC safety concern.

Schedule C

SCE initiated plant betterment projects.

Schedule A dates may be modified only with prior NRC approval in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to the NRC as described in Section V below. Schedule C dates are provided for information to allow the NRC to gain perspective on the current plant capital modification load and may be changed at SCE's discretion. Schedules A, B and C together provide the basis for assessing the overall effect of changes to schedules and serve as a departure point for discussion between the NRC and SCE regarding such changes, as discussed below.

IV. SCHEDULE MODIFICATIONS

An important aspect of SCE's planning effort is the recognition that the schedules will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that SCE finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond SCE's control. It is important that the procedure used by SCE for changing the schedules be documented.*/ In addition, the NRC must play a role in the oversight of the scheduling process (and must, in fact, judge the acceptability of proposed date changes in Schedule A). Accordingly, it is important that the NRC's role, and the interaction between the NRC and SCE be clearly defined, as discussed below.

*/ Schedules A, B and C will contain sufficient detail to identify those plant capital modifications with completion dates keyed to fuel cycle outages. The schedules may also contain specific dates (either calendar date or keyed to some other milestone) for major evaluations. In any case, a change in outage period shall not be considered a schedule change.

V. SOUTHERN CALIFORNIA EDISON COMPANY RESPONSIBILITIES

The Integrated Living Schedule requires that SCE monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

Southern California Edison will update Schedules A and B semi-annually and submit the revised schedules to the NRC beginning six months following NRC approval of the Plan. In addition to updating the schedules, SCE will:

- o Summarize progress in implementing NRC requirements concerning plant modifications.
- o Identify changes since the last report.
- o Summarize the reasons for schedule changes associated with Schedules A and B.
- o Indicate the expected percentage allocation of resources on Regulatory and Betterment projects for the next refueling or other outage.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications to the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or SCE actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- o Determine the priority of the project, or changed priority, using the Westinghouse Analytical Ranking Process.
- o Schedule the new or changed item to avoid rescheduling other items already well underway, if it can be reasonably achieved.
- o Alter Schedule B items before Schedule A items unless priorities indicate that a Schedule A project should be rescheduled by appropriate Commission procedures.
- o Select a schedule for the new or changed item which will help maintain an optimum integrated program of work.

As noted above, no changes will be made to Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after SCE has determined that rescheduling of lower priority work either will not significantly assist in scheduling Schedule A without change, or that the safety, cost or schedule penalties from rescheduling lower priority work significantly outweigh the change in a Schedule A completion date.

SCE will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When SCE determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

Work items in Schedule B may be rescheduled or work items may be added to Schedule B by SCE without NRC approval; however, SCE will inform the NRC Project Manager as early as possible when serious consideration is given to significantly changing the schedule or adding an item in Schedule B.

When SCE adopts a significant change for an item in Schedule B, it will provide the NRC written notification thereof, including the reasons therefore and information on any necessary compensatory actions. The NRC may request further explanation or discussion concerning such change. In this event, discussions will be initiated with the NRC Project Manager. However, SCE changes to scheduled dates will be effective unless subsequently modified by SCE.

Work items in Schedule C may be rescheduled or work items may be added to Schedule C by SCE without NRC notification. SCE will report changes to Schedule C items in its semi-annual update to be provided in accordance with Section V.A above. This schedule is provided for information purposes only and is intended to provide the NRC a better understanding of the unit's overall plant capital modification program.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the schedules are inevitable. Actions required by the NRC are discussed below:

A. Southern California Edison Originated Changes

1. Upon receipt from SCE of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to act on the request in accordance with applicable procedures.
2. If the request for a modification of Schedule A is denied, the NRC shall promptly inform SCE and provide the reasons for denial.

3. NRC consideration of SCE changes in non-Schedule A items is covered by V.B above.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with its overall regulatory responsibilities and, unless public health, safety, or interest require otherwise, will take into account the impact of such action on SCE's ability to complete effectively the items on Schedules A, B and C and, in consultation with SCE, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and SCE recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide SCE a reasonable opportunity to propose overall changes in the total integrated requirements. Any resulting changes in items in Schedule A will be approved by the NRC in accordance with established procedures, and will thereupon be reflected in a revised Schedule A submitted by SCE. SCE will inform the NRC of any resulting changes in Schedule B in accordance with Section V. above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in plant modifications. For issues on which the NRC requests scheduling information, these issues may be included in Schedule B in accordance with Sections II and III above. As for the case of NRC originated changes to Schedule A items, the NRC will provide SCE a reasonable opportunity to propose overall changes in the total ILS which would most effectively accommodate such issues. Any resulting changes in schedules will thereupon be reflected in revised Schedules submitted by SCE.

VIII. MODIFICATIONS TO THE PLAN

The licensee and the NRC recognize that the Plan itself may require future revision. Accordingly, if such a change is deemed necessary by SCE, a revised Plan may be submitted for NRC approval. The revised plan will become effective upon notification to SCE of NRC approval.