

NRR-PMDAPEm Resource

From: Wengert, Thomas
Sent: Thursday, September 11, 2014 2:56 PM
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Subject: SONGS - REVISED Draft RAI Concerning TS Section 5 "Administrative Controls" License Amendment Request (TAC Nos. MF2954 and MF2955)
Attachments: SONGS - Revised Draft RAI Concerning Section 5 LAR.pdf

By letter dated October 21, 2013, as supplemented by letters dated June 5 and August 11, 2014, Southern California Edison (SCE), proposed an amendment to modify the operating Technical Specifications (TSs) at San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, to be consistent with the current permanently shutdown and defueled status of the reactor. The amendments revise and remove certain requirements from the Section 5, "Administrative Controls," portions of the SONGS Units 2 and 3 TS that are no longer applicable to the units in a permanently defueled condition. Specifically, the amendments revise TS Sections 5.1, "Responsibility," 5.2, "Organization," and 5.3, "Facility Staff Qualifications," to reflect new staffing and training requirements for operating staff.

The NRC staff has determined that additional information is needed to complete its review. Attached is a revised Draft Request for Additional Information (RAI), based on a clarification call with the NRC staff held on September 3, 2014.

Please call me if you would like to set up a conference call to clarify this revised draft RAI.

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Options

Priority: Standard
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REVISED DRAFT REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST REGARDING CHANGES
TO THE ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL SPECIFICATIONS
SOUTHERN CALIFORNIA EDISON
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
DOCKET NOS. 50-361 AND 50-362

By letter dated October 21, 2013, as supplemented by letters dated June 5 and August 11, 2014, Southern California Edison (SCE), proposed an amendment to modify the operating TSs at San Onofre Nuclear Generating Station (SONGS), Units 2 and 3 to be consistent with the current permanently shutdown and defueled status of the reactor. The amendments revise and remove certain requirements from the Section 5, "Administrative Controls," portions of the SONGS Units 2 and 3 TS that are no longer applicable to the units in a permanently defueled condition. Specifically, the amendments revise TS Sections 5.1, "Responsibility," 5.2, "Organization," and 5.3, "Facility Staff Qualifications," to reflect new staffing and training requirements for operating staff.

The NRC staff has determined that additional information is needed to continue the review as discussed below.

Background for RAI #1:

SCE has proposed the following administrative requirements in the permanently defueled Technical Specifications:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 5.2.2-1.

Table 5.2.2-1
Minimum Shift Crew Composition

POSITION	MINIMUM STAFFING
Certified Fuel Handler	1*
Certified Operator	1

Note: The Certified Operator position may be filled by a Certified Fuel Handler.

*May be shared between Units 2 and 3.

However, the technical specification is silent as to the location of the crew. SCE has not proposed any other technical specification that addresses or restricts the location of the operations shift onsite. For a reactor authorized to operate, the regulations in 10 CFR 50.54(m) specify a minimum control room staffing level at all times. For a permanently shutdown and

defueled reactor, 10 CFR 50.54(m) is not applicable. There is no equivalent regulation that directly requires control room staffing for a permanently shutdown and defueled reactor. As such, it is conceivable that the control room at SONGS could be unoccupied for periods of time if the technical specifications, as proposed, were approved.

The NRC staff recognizes that management, oversight and control of spent fuel pool operations may not require a presence in the control room and resolution of most operational issues related to spent fuel pool (SFP) function may be more readily accomplished at the SFP location. Because of the robust design of the SFP and the low decay heat load of the stored fuel, events involving the SFP are expected to evolve slowly and continuous manning of the control room by the shift manager may not be necessary at all times. However, SCE has not fully justified its basis for proposing technical specifications that would permit no staffing presence in the control room.

Specifically;

- No discussion has been provided on how the operations staff would become aware of and respond to any control room alarms or instrument indications of abnormal conditions (such as off-normal radiation, fire, or electrical anomalies) if no one is present in the control room.
- The control room is a communications focal point. SCE has not addressed how communications are coordinated, both internally to the site and with external agencies (such as the NRC), without an operations crew present in the control room. Given a condition where the control room is not staffed, an explanation of the communications systems that would be used for coordination of activities and notifications, both onsite and with external agencies, should be provided. For example, how would SONGS receive an important security related notification from NRC that may be placed via the ENS system?

RAI-1

Please provide a comprehensive discussion and justification supporting the absence of a requirement for minimum control room staffing in the technical specifications. The discussion should specifically address how the current functions of the control room will be accomplished if the control room is not continuously staffed by qualified personnel.

RAI-2 (Revised)

Please provide an assessment that demonstrates the emergency plan functions can be conducted assuming the shift manager and/or the non-certified operator are absent from the control room and are at the most distant permitted locations from the control room. An evaluation that demonstrates that the operations staff can perform its emergency plan functions without a reduction in effectiveness to the emergency plan, given the staff may be anywhere in the protected area when compared to being present in the control room, similar to a 10 CFR 50.54(q)(3) evaluation per the guidance provided in Regulatory Guide 1.219, would be acceptable.