

June 28, 2016

GL2016-01

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: **Docket Nos. 50-206, 50-361, and 50-362**
Response to Generic Letter 2016-01
San Onofre Nuclear Generating Station Units 1, 2 and 3

Reference: 1) NRC Generic Letter 2016-01: Monitoring of Neutron-Absorbing
Materials in Spent Fuel Pools, dated April 7, 2016

Dear Sir or Madam:

This is in response to the Generic Letter 2016-01 (Reference 1) request to submit information, or provide references to previously docketed information, which demonstrates that credited neutron-absorbing materials in the Spent Fuel Pool (SFP) of power reactors and the fuel storage pool, reactor pool, or other wet locations designed for the purpose of fuel storage are in compliance with the licensing and design basis, and with applicable regulatory requirements, and that there are measures in place to maintain this compliance.

Generic Letter 2016-01 is addressed to all nuclear power reactors with a license issued under Title 10 of the Code of Federal Regulations (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," except those that have permanently ceased operations with all reactor fuel removed from onsite SFP storage. The Generic Letter requested that a response be provided in 210 days.

Generic Letter 2016-01 is not applicable to San Onofre Nuclear Generating Station (SONGS) Unit 1 as there is no longer any spent fuel in wet storage at SONGS Unit 1. The generic Letter is applicable to SONGS Units 2 and 3. The enclosure provides Southern California Edison's (SCE's) response to Generic Letter 2016-01 for SONGS Units 2 and 3.

This letter does not contain any commitments.

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June 28, 2016

If there are any questions, please call Mr. Jim Kay, Manager, Nuclear Regulatory Affairs, at (949) 368-7418.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 28, 2016.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Kay", with a stylized flourish at the end.

Enclosure: Response to Generic Letter 2016-01: Monitoring of Neutron-Absorbing Materials in Spent Fuel Pools

cc: M. Dapas, Regional Administrator, NRC Region IV
M. G. Vaaler, NRC Project Manager, San Onofre Unit s 1, 2 and 3
J. E. Whitten, Region IV, Branch Chief, Fuel Cycle and Decommissioning Branch

Enclosure

Response to Generic Letter 2016-01:
Monitoring of Neutron-Absorbing
Materials in Spent Fuel Pools

RESPONSE TO NRC GENERIC LETTER 2016-01: MONITORING OF NEUTRON-ABSORBING MATERIALS IN SPENT FUEL POOLS

REQUESTED INFORMATION

The NRC requested information in the following five areas for use in verifying compliance:

- (1) a description of the neutron-absorbing material credited in the SFP NCS analysis of record (AOR) and its configuration in the SFP;
- (2) a description of the surveillance or monitoring program used to confirm that the credited neutron-absorbing material is performing its safety function, including the frequency, limitations, and accuracy of the methodologies used;
- (3) a description of the technical basis for determining the interval of surveillance or monitoring for the credited neutron-absorbing material;
- (4) a description of how the credited neutron-absorbing material is modeled in the SFP NCS AOR and how the monitoring or surveillance program ensures that the actual condition of the neutron-absorbing material is bounded by the NCS AOR; and
- (5) a description of the technical basis for concluding that the safety function for the credited neutron-absorbing material in the SFP will be maintained during design-basis events.

As stated in Generic Letter 2016-01, the NRC will accept responses based on categorization. SONGS Units 2 and 3 fall into Category 1.

Category 1 describes power reactors that do not credit neutron-absorbing materials other than soluble boron in the AOR. In some cases, no neutron-absorbing material is present in the spent fuel storage racks, and in other cases, credit for the neutron-absorbing material has been removed through a regulatory action (e.g., approved license amendment). Those addressees may submit a response letter confirming that no neutron-absorbing materials other than soluble are currently credited to meet NRC subcriticality requirements in the SFP.

Amendment No. 213 to Facility Operating License No. NPF-10 and Amendment No. 205 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively, dated September 27, 2007 (ML072550175), consisted of changes to the Technical Specifications to increase the minimum allowed boron concentration of the spent fuel pool and allow credit for soluble boron, guide tube inserts made from borated stainless steel, and Fuel Storage Patterns in place of Boraflex.

Although Boraflex was initially installed as a neutron absorbing material, it is no longer credited in the AOR. Use of borated stainless steel guide tube inserts is allowed by the amendments described above but has not been necessary at SONGS Units 2 and 3. No guide tube inserts are currently in use. As described in the amendments above, in the unlikely event that use of guide tube inserts become necessary, an associated monitoring program would be required.