



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

January 9, 2018

Mr. Thomas J. Palmisano
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 1, 2, AND 3 -
ISSUANCE OF AMENDMENTS TO CHANGE THE DEFUELED TECHNICAL
SPECIFICATIONS TO REFLECT PERMANENT REMOVAL OF SPENT FUEL
FROM THE SPENT FUEL POOLS (CAC NOS. L53157, L53158, AND L53159)**

Dear Mr. Palmisano:

The U.S. Nuclear Regulatory Commission (NRC) has issued the enclosed Amendment No. 169 to Facility Operating License No. DPR-13, Amendment No. 237 to Facility Operating License No. NPF-10, and Amendment No. 230 to Facility Operating License No. NPF-15 for the San Onofre Nuclear Generating Station (SONGS), Units 1, 2, and 3, respectively. The amendments consist of changes to the SONGS Facility Operating Licenses and Technical Specifications (TS) in response to your application dated December 15, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16355A014). These changes reflect the removal of all spent nuclear fuel from the SONGS, Units 2 and 3, spent fuel pools and its transfer to dry cask storage within an onsite independent spent fuel storage installation (ISFSI). The changes also make conforming revisions to the SONGS, Unit 1, TS and combine them with the SONGS, Units 2 and 3, TS. These changes will more fully reflect the permanently shutdown status of the decommissioning facility, as well as the reduced scope of structures, systems, and components necessary to ensure plant safety once all spent fuel has been permanently moved to the SONGS ISFSI, an activity which is currently scheduled for completion in 2019.

The NRC staff has determined that its documented safety evaluation does not contain Sensitive Unclassified Non-Safeguards Information (SUNSI) pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390, "Public inspections, exemptions, requests for withholding." In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

T. Palmisano

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A copy of the related Safety Evaluation is provided in Enclosure 4. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice. If you have any questions, please contact me at 301-415-3178, or via e-mail at marlayna.vaaler@nrc.gov.

Sincerely,

/RA/

Marlayna G. Vaaler, Project Manager
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety and Safeguards

Docket Nos. 50-206, 50-361, and 50-362

Enclosures:

1. Amendment No. 169 to DPR-13
2. Amendment No. 237 to NPF-10
3. Amendment No. 230 to NPF-15
4. Safety Evaluation

cc w/encls: Distribution via Listserv

T. Palmisano

- 2 -

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 -
ISSUANCE OF AMENDMENTS TO CHANGE THE DEFUELED TECHNICAL
SPECIFICATIONS TO REFLECT PERMANENT REMOVAL OF SPENT FUEL
FROM THE SPENT FUEL POOLS (CAC NOS. L53157, L53158, AND L53159)
[JANUARY 9, 2018]

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OFFICE	NMSS/RDB/PM	NMSS/DUWP/LA	OGC/NLO	NMSS/RDB/BC
NAME	MVaaler	CHolston	SClark*	BWatson
DATE	12/8/2017	12/18/2017	1/8/2018	1/9/2018

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**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

DOCKET NO. 50-206

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 169
License No. DPR-13

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for a license amendment filed by the Southern California Edison Company and the San Diego Gas and Electric Company (the licensee), dated December 15, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and applicable portions of the Commission's regulations set forth in 10 CFR Chapter I, and all required notifications to other agencies or bodies have been duly made;
 - B. Construction of San Onofre Nuclear Generating Station, Unit 1 (the facility) has been completed in conformity with Construction Permit No. CPPR-13 and the application, as amended; the provisions of the Act; and the regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended; the provisions of the Act; and the applicable rules and regulations of the Commission;
 - D. There is reasonable assurance (i) that the activities authorized by this amended license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with applicable portions of the Commission's regulations set forth in 10 CFR Chapter I;
 - E. The licensee is technically qualified to engage in the activities authorized by this license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;
 - F. The licensee has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;

Enclosure 1

- G. The issuance of this license will not be inimical to the common defense and security or to the health and safety of the public;
 - H. The issuance of this license is in accordance with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," of the Commission's regulations and all applicable requirements have been satisfied; and
 - I. The possession of source, byproduct, and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by changes to paragraph 2.C(2) of Facility Operating License No. DPR-13, which is hereby amended to read as follows:
- (2) Technical Specifications and Environmental Protection Plan
- The Technical Specifications contained in Appendix A, as revised through Amendment No. 169, are hereby incorporated in the license. Southern California Edison Company shall maintain the facility in accordance with the Technical Specifications.
3. This license amendment is effective as of the date Southern California Edison submits a written notification to the NRC that all spent nuclear fuel assemblies have been transferred out of the SONGS spent fuel pools and placed in storage within the onsite independent spent fuel storage installation, and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Bruce A. Watson, CHP, Chief
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety and Safeguards

Attachment:
Changes to Facility
Operating License No. DPR-13

Date of Issuance: January 9, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 169

TO FACILITY OPERATING LICENSE NO. DPR-13

DOCKET NO. 50-206

Replace the following pages of the Facility Operating License No. DPR-13 and Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License No DPR-13

REMOVE

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INSERT

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Technical Specifications

REMOVE

All pages
(including title page)

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4.0-1
5.0-1

chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

- (5) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This license shall be deemed to contain and is subject to the conditions specified in the Act and the applicable provisions of the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is not authorized to operate the facility as a nuclear reactor.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 169, are hereby incorporated in the license. Southern California Edison Company shall maintain the facility in accordance with the Technical Specifications.

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4.0 DESIGN FEATURES

4.3 Fuel Storage

Spent Fuel shall not be stored in the spent fuel pool.

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8.1 Each high radiation area as defined 10 CFR 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP) or equivalent.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable RWP or equivalent.

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty, radiation protection supervisor, or his or her designee. Doors shall remain locked except during periods of access by personnel under an approved RWP or equivalent that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the RWP or equivalent, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.



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SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 237
License No. NPF-10

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated December 15, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as supplemented; the provisions of the Act; and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Facility Operating License No. NPF-10 is hereby amended to read as follows:

Paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read:

2.C(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 237, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

Paragraph 2.C(26) of Facility Operating License No. NPF-10 is hereby amended to read:

2.C(26) Mitigation Strategy License Condition

Deleted by Amendment No. 237.

Paragraph 2.C(28) of Facility Operating License No. NPF-10 is hereby amended to read:

2.C(28) Deleted.

3. This license amendment is effective as of the date Southern California Edison submits a written notification to the NRC that all spent nuclear fuel assemblies have been transferred out of the SONGS spent fuel pools and placed in storage within the onsite independent spent fuel storage installation, and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Bruce A. Watson, CHP, Chief
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety and Safeguards

Attachment:
Changes to Facility
Operating License No. NPF-10

Date of Issuance: January 9, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 237

TO FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Facility Operating License No. NPF-10 and Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License No NPF-10

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Technical Specifications

REMOVE

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5.0-1

- (3) SCE, pursuant to the Act and 10 CFR Part 70, to possess at any time special nuclear material that was used as reactor fuel, in accordance with the limitations for storage, as described in the Final Safety Analysis Report, as supplemented and amended;
 - (4) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required; and possess any byproduct, source and special material as sealed neutron sources that was used for reactor startup;
 - (5) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
 - (6) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of San Onofre Nuclear Generating Station, Units 1 and 2 and by the decommissioning of San Onofre Nuclear Generating Station Unit 1.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Deleted
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 237, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- r. Plant-Specific Calculations for Compliance with 10 CFR Section 50.46 (II.K.3.31, SSER #1)

Deleted by Amendment No. 185

- s. Improving Licensee Emergency Preparedness (III.A.2, SSER#1, SSER #5)

Deleted by Amendment No. 185

- (20) Surveillance Program (Section 1.12, SSER #5)

Deleted by Amendment No. 185

- (21) Laboratory Instrumentation (Section 1.12, SSER #5)

Deleted by Amendment No. 185

- (22) Design Verification Program (Section 3.7.4, SSER #5)

Deleted by Amendment No. 185

- (23) Emergency Preparedness Conditions

Deleted by Amendment No. 185

- (24) RCS Depressurization System (PORV's)

Deleted by Amendment No. 185

- (25) Qualification of Auxiliary Feedwater (AFW) Pump Motor Bearings

Deleted by Amendment No. 185

- (26) Mitigation Strategy License Condition

Deleted by Amendment No. 237

(27) Deleted.

(28) Deleted.

- D. Exemptions to certain requirements of Appendices G, H and J to 10 CFR Part 50 are described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.

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4.0 DESIGN FEATURES

4.3 Fuel Storage

Spent Fuel shall not be stored in the spent fuel pool.

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

- 5.8.1 Each high radiation area as defined 10 CFR 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP) or equivalent.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable RWP or equivalent.

- 5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty, radiation protection supervisor, or his or her designee. Doors shall remain locked except during periods of access by personnel under an approved RWP or equivalent that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the RWP or equivalent, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

- 5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.
-



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WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 230
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated December 15, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as supplemented;, the provisions of the Act; and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Facility Operating License No. NPF-15 is hereby amended to read as follows:

Paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read:

2.C(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 230, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

Paragraph 2.C(27) of Facility Operating License No. NPF-15 is hereby amended to read:

2.C(27) Mitigation Strategy License Condition

Deleted by Amendment No. 230.

Paragraph 2.C(29) of Facility Operating License No. NPF-15 is hereby amended to read:

2.C(29) Deleted.

3. This license amendment is effective as of the date Southern California Edison submits a written notification to the NRC that all spent nuclear fuel assemblies have been transferred out of the SONGS spent fuel pools and placed in storage within the onsite independent spent fuel storage installation, and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Bruce A. Watson, CHP, Chief
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety and Safeguards

Attachment:
Changes to Facility
Operating License No. NPF-15

Date of Issuance: January 9, 2018

ATTACHMENT TO LICENSE AMENDMENT NO. 230

TO FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Facility Operating License No. NPF-15 and Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License No NPF-10

REMOVE

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INSERT

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7

Technical Specifications

REMOVE

All pages

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4.0-1
5.0-1

- (3) SCE, pursuant to the Act and 10 CFR Part 70, to possess at any time special nuclear material that was used as reactor fuel, in accordance with the limitations for storage, as described in the Final Safety Analysis Report, as supplemented and amended;
 - (4) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required; and possess any byproduct, source and special material as sealed neutron sources that was used for reactor startup;
 - (5) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
 - (6) SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of San Onofre Nuclear Generating Station, Units 1 and 2 and by the decommissioning of San Onofre Nuclear Generating Station Unit 1.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Deleted
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 230, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(27) Mitigation Strategy License Condition

Deleted by Amendment No. 230.

(28) Deleted.

(29) Deleted.

D. Exemptions to certain requirements of Appendices G, H and J to 10 CFR Part 50 are described in the Office of Nuclear Reactor Regulation's Safety Evaluation.

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4.0 DESIGN FEATURES

4.3 Fuel Storage

Spent Fuel shall not be stored in the spent fuel pool.

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8.1 Each high radiation area as defined 10 CFR 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP) or equivalent.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable RWP or equivalent.

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty, radiation protection supervisor, or his or her designee. Doors shall remain locked except during periods of access by personnel under an approved RWP or equivalent that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the RWP or equivalent, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.



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WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF
NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
RELATED TO AMENDMENT NO. 169 TO FACILITY OPERATING LICENSE NO. DPR-13
AND AMENDMENT NO. 237 TO FACILITY OPERATING LICENSE NO. NPF-10
AND AMENDMENT NO. 230 TO FACILITY OPERATING LICENSE NO. NPF-15
SOUTHERN CALIFORNIA EDISON COMPANY
SAN DIEGO GAS AND ELECTRIC COMPANY
THE CITY OF RIVERSIDE, CALIFORNIA
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3
DOCKET NOS. 50-206, 50-361, AND 50-362

1.0 INTRODUCTION

The San Onofre Nuclear Generating Station (SONGS), Units 1, 2 and 3, are decommissioning nuclear power reactor units located in San Diego County, California, approximately 62 miles southeast of Los Angeles, and approximately 51 miles northwest of San Diego, on an 84 acre site located entirely within the Camp Pendleton Marine Corps Base. The licensee, Southern California Edison (SCE), is the holder of Facility Operating License Nos. DPR-13 (Unit 1), NPF-10 (Unit 2) and NPF-15 (Unit 3), which were issued pursuant to the Atomic Energy Act of 1954, as amended, and Part 50, "Domestic Licensing of Production and Utilization Facilities," of Title 10 of the *Code of Federal Regulations* (10 CFR).

SONGS, Unit 1, was granted its provisional operating license by the U.S. Nuclear Regulatory Commission (NRC) on January 1, 1968 (Reference 1), and ceased operation on November 30, 1992 (Reference 2). The licensee completed defueling on March 6, 1993 (Reference 3), and maintained the unit in deferred decontamination, or SAFSTOR, until June 1999, when it initiated active decommissioning and dismantlement, or DECON (Reference 4). On December 28, 1993 (Reference 5), the NRC approved the Permanently Defueled Technical Specifications for SONGS, Unit 1. SCE submitted the proposed Decommissioning Plan for SONGS, Unit 1, on November 3, 1994 (Reference 6).

As a result of the 1996 revision to the regulations in 10 CFR 50.82, "Termination of license," the NRC replaced the requirement for a decommissioning plan with a requirement for a Post

Shutdown Decommissioning Activities Report (PSDAR). On August 28, 1996, the SONGS 1 Decommissioning Plan became the SONGS 1 PSDAR (61 FR 67079; December 19, 1996). On December 15, 1998 (Reference 7), SCE submitted an update to the PSDAR to the NRC, as required by 10 CFR 50.82(a)(7), in order to begin planning for the dismantlement and decommissioning of SONGS, Unit 1. Dismantlement of SONGS, Unit 1, is essentially complete and most of the structures and equipment have been removed and sent to a nuclear waste disposal facility. All of the SONGS, Unit 1, fuel is being stored in the onsite independent spent fuel storage installation (ISFSI), and the NRC has previously approved Technical Specifications (TS) that reflect the transfer of all SONGS, Unit 1, spent fuel into dry storage (Reference 8).

By letter dated June 12, 2013 (Reference 9), SCE submitted a certification to the NRC indicating its intention to permanently cease power operations at SONGS, Units 2 and 3, as of June 7, 2013, pursuant to 10 CFR 50.82(a)(1)(i). By letters dated June 28, 2013 (Reference 10), and July 22, 2013 (Reference 11), SCE submitted certifications of permanent removal of fuel from the Unit 3 and Unit 2 reactor vessels as of October 5, 2012, and July 18, 2013, respectively, pursuant to 10 CFR 50.82(a)(1)(ii). Upon docketing of these certifications, and pursuant to 10 CFR 50.82(a)(2), the SONGS, Units 2 and 3, facility operating licenses no longer authorize operation of the reactors or emplacement or retention of fuel into the reactor vessels. By letter dated September 23, 2014 (Reference 12), SCE submitted the PSDAR for SONGS, Units 2 and 3. The PSDAR outlines the decommissioning activities for SONGS, Units 2 and 3; the PSDAR was reviewed by the NRC staff in a letter dated August 20, 2015 (Reference 13).

By application dated December 15, 2016 (Reference 14), the licensee requested changes to the SONGS Facility Operating Licenses and TS to reflect the removal of all spent nuclear fuel from the SONGS, Units 2 and 3, spent fuel pools and its transfer to dry cask storage within an expanded onsite ISFSI. The changes also make conforming revisions to the SONGS, Unit 1, TS and combine them with the SONGS, Units 2 and 3, TS. These changes will more fully reflect the current status of the facility, as well as the reduced scope of structures, systems, and components necessary to ensure plant safety once all spent fuel has been permanently moved to the SONGS ISFSI, an activity which is currently scheduled for completion in 2019.

2.0 REGULATORY EVALUATION

This safety evaluation assesses the acceptability of the proposed SONGS ISFSI-Only TS. These TS would replace the current SONGS Permanently Defueled Technical Specifications (which were approved by the NRC on July 17, 2015 (Reference 15)) after all of the SONGS, Units 2 and 3, spent fuel has been transferred from the spent fuel pools (SFPs) to the expanded onsite ISFSI. The regulatory requirements and associated guidance on which the NRC based its acceptance and evaluation of the SONGS ISFSI-Only TS follows.

In 10 CFR 50.36, "Technical specifications," the Commission established its regulatory requirements related to the content of technical specifications. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences. Specifically, the Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity" (Reference 16). Pursuant to 10 CFR 50.36, TS are required to include items in the following five categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs);

(3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TS.

In September 1992, the NRC issued NUREG-1431, "Standard Technical Specifications Westinghouse Plants" (Reference 17), and NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants" (Reference 18), which were developed using the guidance and criteria contained in the Commission's Interim Policy Statement on Technical Specifications (Reference 19). Standard Technical Specifications (STS) were established as a model for developing improved TS for Westinghouse and Combustion Engineering plants, respectively. STS reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which was published in a "Split Report" issued to the Nuclear Steam Supply System (NSSS) Owners Groups in May 1988 (Reference 20). STS also reflect the results of extensive discussions concerning various drafts of STS, so that the application of the TS criteria would consistently reflect detailed system configurations and operating characteristics for all NSSS designs. As such, the generic TS Bases presented in NUREG-1431 and NUREG-1432 provide an abundance of information regarding the extent to which the STS present requirements that are necessary to protect public health and safety.

On July 22, 1993, the Commission published a Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (Reference 21) on the scope and purpose of TS for nuclear power plants. This Policy Statement included guidance criteria to be used in determining which of the LCOs and associated surveillances should remain in the TS. The Policy Statement established four criteria to define the scope of equipment and parameters to be included in the improved standard technical specifications. These criteria were developed for licenses authorizing operation and focused on instrumentation to detect degradation of the reactor coolant system pressure boundary, as well as on equipment or process variables that affect the integrity of fission product barriers during design-basis accidents (DBAs) or transients. The fourth criterion refers to the use of operating experience and probabilistic risk assessment to identify and include in the TS those structures, systems, and components shown to be significant to public health and safety. These criteria, codified by 10 CFR 50.36 (60 FR 36953; July 19, 1995)), are the source of the TS requirements for facilities licensed under 10 CFR Part 50. A general discussion of these considerations is provided below.

Criterion 1 at 10 CFR 50.36(c)(2)(ii)(A) states that TS LCOs must be established for "installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary." Since the SONGS facility no longer has fuel in the reactor and is no longer licensed to operate, this criterion is not applicable.

Criterion 2 at 10 CFR 50.36(c)(2)(ii)(B) states that TS LCOs must be established for a "process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." The purpose of this criterion is to capture those process variables that have initial values assumed in the DBA and transient analyses, and which are monitored and controlled during power operation. Since the SONGS facility no longer has fuel in the reactor vessels and is no longer licensed to operate, this criterion is not applicable.

Criterion 3 at 10 CFR 50.36(c)(2)(ii)(C) states that TS LCOs must be established for "structures, systems, or components that are part of the primary success path and which function or actuate

to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.” The intent of this criterion is to capture into the TS those structures, systems, and components that are part of the primary success path of a safety sequence analysis. The primary success path of a safety sequence analysis consists of combinations and sequences of equipment needed to operate (including consideration of the single failure criterion), so that the plant response to DBAs and transients limits the consequences of these events to within the appropriate acceptance criteria. Since fuel will have been removed from the spent fuel pools at the SONGS facility prior to implementation of this amendment, this criterion is not applicable.

Criterion 4 at 10 CFR 50.36(c)(2)(ii)(D) states that TS LCOs must be established for structures, systems, and components which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. The intent of this criterion is that risk insights and operating experience be factored into the establishment of appropriate TS LCOs. Since fuel will have been removed from the spent fuel pools at the SONGS facility prior to implementation of this amendment, this criterion is not applicable.

10 CFR 50.36(c)(6), “Decommissioning,” applies only to nuclear power reactor facilities that have submitted the certifications required by 10 CFR 50.82(a)(1). For such facilities, TS involving safety limits, limiting safety system settings, and limiting control system settings; limiting conditions for operation; surveillance requirements; design features; and administrative controls will be developed on a case-by-case basis.

Addressing administrative controls, 10 CFR 50.36(c)(5) states that administrative controls “are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.” The particular administrative controls to be included in the TS, therefore, are the provisions that the Commission deems essential for the safe operation of the facility that are not already covered by other regulations. Accordingly, the NRC staff has determined that administrative control requirements that are not specifically required under Section 50.36(c)(5), and which are not otherwise necessary to obviate the possibility of an abnormal situation, or an event giving rise to an immediate threat to the public health and safety, may be relocated to more appropriate documents (e.g., the Quality Assurance (QA) Program, Licensee Controlled Specifications (LCS), Physical Security Plan (PSP), or Emergency Plan (EP)), which are subject to their own regulatory controls, such as 10 CFR 50.54(a) for QA programs and 10 CFR 50.59, “Changes, tests, and experiments.” Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(5), the particular details of these controls may be relocated to other licensee-controlled documents, where the 10 CFR 50.59 change evaluation process ensures that the licensee is providing adequate regulatory control.

The QA program is a logical candidate for the relocation of administrative controls due to the requirements imposed by regulations such as Appendix B, “Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” to 10 CFR Part 50, the existing NRC-approved QA plans and commitments to industry QA standards, and the established QA program change control process in 10 CFR 50.54(a). In addition, the LCS are part of the SONGS, Units 2 and 3, Updated Final Safety Analysis Report (UFSAR), and are therefore also subject to the requirements of 10 CFR 50.59. NRC Administrative Letter (AL) 95-06, “Relocation of Technical Specification Administrative Controls Related to Quality Assurance”

(Reference 22), provides guidance to licensees requesting amendments that relocate administrative controls to NRC-approved QA program descriptions, where subsequent changes are controlled pursuant to 10 CFR 50.54(a). NRC AL 95-06 provides specific guidance in the areas of: (1) independent safety engineering groups, (2) reviews and audits, (3) procedure review process, and (4) records and record retention. Some of the TS relocations requested by SCE as part of the establishment of ISFSI-Only TS for SONGS are specifically discussed in AL 95-06, while others are similar in nature to those discussed in the AL. Relocations not specifically discussed in AL 95-06 are evaluated with respect to the appropriateness of the relocation. Editorial changes are allowed without basis by 10 CFR 50.54(a)(3), and therefore are not explicitly evaluated in this safety evaluation report.

In addition, AL 95-06 states that for the procedure review process, relocation should be to a QA plan that contains a commitment to process procedures and procedure changes in accordance with an accepted standard to American National Standards Institute (ANSI) N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants" (Reference 23). However, as part of the NRC's approval of the SONGS Defueled Quality Assurance Plan (DQAP) (Reference 24), the commitment to ANSI N18.7 was deleted. Regardless of this change, the NRC staff determined that relocation of site-specific TS requirements regarding the establishment, implementation and maintenance of procedures to the QA plan remains acceptable because the change control process of 10 CFR 50.54(a) will still govern any future changes to these requirements, as described in AL 95-06.

On February 9, 1996 (Reference 25), the NRC issued amendments to SONGS, Units 2 and 3, which consisted of changes to the TS and the license conditions that converted the previous custom TS (CTS) to the improved TS (ITS), and relocated certain requirements to other licensee-controlled documents. The current proposed amendments delete the portions of the previous SONGS, Units 2 and 3, TS that are no longer applicable to a permanently defueled facility with all irradiated fuel in dry storage within an ISFSI, while modifying the remaining portions to correspond to the permanently defueled condition, consistent with STS.

3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of its proposed ISFSI-Only TS changes, as described in the application dated December 15, 2016.

3.1 Background

SONGS, Unit 1, has been permanently shutdown since November 30, 1992, and the final removal of fuel from its reactor vessel was completed on March 6, 1993. SONGS, Units 2 and 3, have been shutdown since January 2012, and SCE submitted certifications of permanent removal of fuel from the Unit 3 and Unit 2 reactor vessels as of October 5, 2012, and July 18, 2013, respectively. SONGS is authorized to possess and store irradiated nuclear fuel at the permanently shutdown and defueled SONGS facility. The spent fuel from SONGS, Unit 1, is stored in the onsite ISFSI and at the General Electric-Hitachi Nuclear Energy Americas, LLC, Morris Operation facility (Docket No. 72-01) located in Morris, Illinois. After the SONGS, Units 2 and 3, reactors were shutdown, all fuel assemblies were removed from the reactor vessels and placed in the SONGS SFPs. The licensee is currently in the process of preparing to transfer all of the remaining spent nuclear fuel from the SONGS SFPs to the

expanded onsite ISFSI. After all the irradiated fuel has been transferred from the SFPs to the SONGS ISFSI, many of the requirements in the current TS are inapplicable or are no longer appropriate. The licensee has proposed multiple changes to the SONGS technical specifications to reflect this change in the status of spent fuel storage.

In its application dated December 15, 2016, SCE requested that the NRC review and approve proposed ISFSI-Only TS for SONGS. The proposed amendments would modify the SONGS, Units 2 and 3, Facility Operating Licenses for consistency with the condition of all irradiated fuel in dry storage within the onsite ISFSI, as well as replace the existing SONGS Permanently Defueled Technical Specifications, which currently reflect spent fuel from SONGS, Units 1, 2, and 3, being stored in the SFPs and onsite ISFSI. Additional changes that SCE is requesting include conforming revisions to the SONGS, Unit 1, TS to combine them with the SONGS, Units 2 and 3, TS. The proposed changes modify the scope of the TS to reflect the reduced scope of structures, systems, and components necessary to ensure plant safety with all spent fuel in dry cask storage within the ISFSI. As discussed in the submittal, the remaining design basis accidents and transients analyzed in Chapter 15 of the SONGS, Units 2 and 3, UFSAR are either (1) no longer applicable for the condition where all spent nuclear fuel is transferred to dry cask storage within an ISFSI, or (2) do not rely on structures, systems or components or parameter limits described in the current TSs. There are no remaining design basis accidents or transients in Chapter 8 of the SONGS, Unit 1, Defueled Safety Analysis Report (DSAR). Each of the proposed changes is evaluated below based on the premise that the changes will not take effect until after all the spent nuclear fuel has been transferred to the SONGS ISFSI.

3.2 Facility Operating License Changes

The licensee proposed to eliminate License Condition 2.C.(26) for SONGS, Unit 2, and License Condition 2.C.(27) for SONGS, Unit 3, related to mitigation strategy. License Conditions 2.C.(26) and 2.C.(27) require the development and maintenance of strategies for addressing large fires and explosions which must address certain specified key areas. The NRC issued this license condition on July 26, 2007 (Reference 26), to incorporate the requirements for the Interim Compensatory Measures (ICM) Order EA-02-026, Section B.5.b mitigation strategies (Reference 27). Subsequently, 10 CFR 50.54(hh)(2) became effective on May 26, 2009 (74 FR 13969). The requirements in section 50.54(hh) set forth mitigation strategies and response procedure requirements for loss of large areas of the plant due to explosions or fire. However, as stated in 10 CFR 50.54(hh)(3), this section does not apply to a defueled reactor that has submitted the certification for permanent removal of fuel under 10 CFR 50.82(a). On November 28, 2011 (Reference 28), the NRC issued a letter that rescinded Item B.5.b of the ICM Order EA-02-26. Therefore, neither the ICM Order nor 10 CFR 50.54(hh) continue to apply to SONGS. Because 10 CFR 50.54(hh) does not apply to SONGS, and Item B.5.b of the ICM Order EA-02-26 has been rescinded, there is no longer a basis for requiring SONGS to develop and maintain mitigation strategies for addressing large fires and explosions. Based on the above, the proposed deletion of License Condition 2.C.(26) for SONGS, Unit 2, and License Condition 2.C.(27) for SONGS, Unit 3, is acceptable.

The licensee also proposed to eliminate License Condition 2.C.(28) for SONGS, Unit 2, and License Condition 2.C.(29) for SONGS, Unit 3, related to an aging management program for long-lived passive structures and components needed for safe storage of fuel in the SFPs. License Conditions 2.C.(28) and 2.C.(29) require that if all spent fuel has not been removed

from the SONGS SFPs by February 16, 2021, an aging-management program must be submitted for NRC approval, which includes those long-lived, passive structures and components that are needed to provide reasonable assurance of the safe condition of the spent fuel in the SFPs. Once approved, the program shall remain in effect for until such time that all spent fuel has been removed from the SFPs. However, after the SONGS SFPs are unloaded and all spent fuel is stored within the ISFSI, there is no longer reliance on any long-lived, passive structures at SONGS, Units 2 and 3, that are needed to provide reasonable assurance of the safe condition of the spent fuel. Therefore, there is no need for an aging management program for these long-lived, passive structures and components. In addition, these license conditions were predicated on spent fuel assemblies not having been removed from the SFPs by February 16, 2021. Because the proposed SONGS ISFSI-Only TS will not be implemented until after the date that the transfer of spent fuel from the SFPs to the ISFSI is complete, which is scheduled to occur in 2019, these license conditions are no longer necessary. Based on the above, the proposed deletion of License Condition 2.C.(28) for SONGS, Unit 2, and License Condition 2.C.(29) for SONGS, Unit 3, is acceptable.

3.3 Technical Specification Changes

The existing SONGS, Units 2 and 3, Permanently Defueled Technical Specifications (PDTs) contain LCOs that provide for appropriate functional capability of equipment required for the safe storage and management of irradiated fuel with fuel stored in a SFP. As such, the existing PDTs provide a level of control in excess of that needed for safe storage and management of irradiated fuel with fuel stored in an ISFSI. The majority of the existing TS are only applicable when irradiated fuel assemblies are within the SFP. Once all the spent fuel assemblies have been transferred to the ISFSI, all remaining LCOs (and associated Surveillance Requirements (SRs)) will no longer be applicable and are being proposed for deletion. The ISFSI-Only TS being proposed reflect the removal of all spent fuel from the SONGS SFPs; in addition, a new TS design requirement is being added that prohibits storage of spent fuel in the SFPs. The proposed changes will result in TS that will be applicable to SONGS after the last spent fuel assembly has been removed from the SFPs and placed within the ISFSI.

The licensee has proposed to delete PDTs Section 1.0, "Use and Application," which includes: "Definitions," "Logical Connectors," "Completion Times," and "Frequency." As will be discussed later in this safety evaluation, all the PDTs that use or refer to the definitions for actions, certified fuel handler, and operable – operability; logical connectors; completion times; or frequency, are to be deleted. As a result of the deletion of any reference to actions, certified fuel handler, and operable – operability; logical connectors; completion times; or frequency, they need not be defined in the PDTs. Therefore, the proposed deletion of the definitions of actions, certified fuel handler, and operable – operability; logical connectors; completion times; and frequency, which comprise all of PDTs Section 1.0, is administrative in nature and acceptable.

The licensee has proposed to delete PDTs Section 3.0, "LCO Applicability," which includes "Limiting Condition for Operation (LCO) Applicability," and "Surveillance Requirement (SR) Applicability." As will be discussed later in this safety evaluation, all the PDTs that use or refer to LCOs or SRs are to be deleted. Without any reference to LCOs or SRs there is no need for them to be defined in the PDTs. The proposed deletion of PDTs Section 3.0 in its entirety is administrative in nature, will have no impact on the continued safe storage and maintenance of spent fuel in the SONGS ISFSI, and is therefore acceptable.

The licensee has proposed to delete PDTS Section 3.1, "Plant Systems," which includes PDTS 3.1.1, "Fuel Storage Pool Water Level," PDTS 3.1.2, "Fuel Storage Pool Boron Concentration," and PDTS 3.1.3, "Spent Fuel Assembly Storage." PDTS 3.1.1 specifies the requirements to ensure that the minimum water level in the SFP meets the iodine decontamination factor assumptions used in the fuel handling accident (FHA) analysis of record, and provides surveillance and action requirements for not meeting the specification. PDTS 3.1.2 specifies the minimum boron concentration in the SFP during movement or storage of fuel assemblies in the SFP, and provides surveillance and action requirements for not meeting the specification. PDTS 3.1.3 specifies restrictions on the placement of fuel assemblies within the SFP, to ensure the reactivity (k_{eff}) of the SFP will always remain less than 1, assuming the pool is flooded with unborated water, and less than 0.95 assuming the pool is flooded with borated water, and provides surveillance and action requirements for not meeting the specification. Following the transfer of all spent fuel to the ISFSI, the SFPs will no longer be used for spent fuel storage. Additionally, as discussed below, the licensee is adding a limitation in the SONGS ISFSI-Only TS which prohibits storage of spent fuel in the SFPs. With spent fuel storage no longer allowed in the SFPs, the specifications included in PDTS Section 3.1 are no longer needed for the safe storage of spent fuel, so the proposed deletion is acceptable.

The licensee has proposed to modify PDTS Section 4.0, "Design Features," which includes PDTS 4.1, "Site," and PDTS 4.3, "Fuel Storage." PDTS 4.1 provides a description and diagrams of the Exclusion Area Boundary (EAB) and the Low Population Zone (LPZ) for SONGS, Units 2 and 3. The minimum distance from the center line of the reactor containment to the site exclusion radius is based on requirements contained in 10 CFR 100.3, "Definitions," regarding operating reactor accident dose analyses. Likewise, the LPZ is based on requirements in 10 CFR 100.3 that the LPZ is an area immediately surrounding the exclusion area in which protective measures could be taken following a serious accident. Because the SONGS, Units 2 and 3, operating licenses no longer authorize operation of the reactor, emplacement or retention of fuel in the reactor vessel, these design features are no longer needed; therefore, the proposed deletion of PDTS 4.1 is acceptable. In addition, the licensee notes that the EAB will remain part of the SONGS licensing basis, but under licensee control. Specifically, the EAB is described in the SONGS, Units 2 and 3, UFSAR, Offsite Dose Calculation Manual (ODCM), and the evaluation conducted for the ISFSI in accordance with 10 CFR 72.212, "Conditions of general license issued under § 72.210" (as the controlled area described in 10 CFR 72.106, "Controlled area of an ISFSI or [Monitored Retrievable Storage Installation] MRS"). Future changes to the EAB will be controlled by evaluations in accordance with 10 CFR 50.59, 10 CFR Part 20, "Standards for Protection Against Radiation," and 10 CFR 72.48, "Changes, tests, and experiments," as appropriate.

The licensee has proposed to modify PDTS 4.3, which currently provides a description and requirements regarding prevention of criticality of spent fuel in the SFP storage racks, prevention of SFP drainage, and spent fuel capacity limitations. Specifically, the licensee has proposed the replacement of the contents of PDTS 4.3 with the statement: "Spent Fuel shall not be stored in the spent fuel pool." Following the transfer of all spent fuel to the ISFSI, the SFPs will no longer be used for spent fuel storage. The licensee is adding a limitation in the ISFSI-Only TS which prohibits storage of spent fuel in the SFPs. With spent fuel storage no longer allowed in the SFPs, the specifications currently included in PDTS 4.3 are no longer needed; therefore, the proposed deletion is acceptable. The proposed revision to PDTS 4.3 also provides a prohibition against the storage of spent fuel in the SFPs, which supports the

licensee's other proposed changes and ensures that fuel will not be placed in a spent fuel pool that has had the associated regulatory controls removed, and is therefore acceptable. In addition, the licensee notes that PDTS 4.3 also refers to requirements in LCS 4.0.100, "Fuel Storage Patterns," including a specific date and revision number. LCS 4.0.100 includes a provision that no changes shall be made without NRC approval in conjunction with changes to PDTS 4.3.1. Accordingly, following NRC approval of the proposed SONGS ISFSI-Only TS changes, LCS 4.0.100 will be deleted as part of implementation of the resulting amendment.

The existing PDTS Section 5.0, "Administrative Controls," contains provisions relating to organization and management, qualifications, TS Bases Control, procedures, recordkeeping, reporting, and high radiation areas, as necessary to assure operation of the SONGS facility in a safe manner. After the transfer of all spent fuel from the SFPs to the ISFSI, all PDTSs in Section 5.0, with the exception of TS 5.8, "High Radiation Area," are proposed to be deleted in their entirety, as discussed in more detail below.

The licensee has proposed to relocate PDTS 5.1, "Responsibility," which provides a description and requirements regarding certain key operational management responsibilities, to the DQAP; except for PDTS 5.1.2, which specifies that the shift manager is responsible for the ultimate command decision authority for all unit activities. The transfer of the administrative controls in PDTS 5.1.1 is consistent with the guidance in AL 95-06, is an administrative change that does not modify any of the administrative controls, and is therefore acceptable. The position of shift manager described in PDTS 5.1.2 is a holdover from the control room function of supervising multiple functions at an operating nuclear power plant. With the limited requirements for supervision of the passive fuel storage at the ISFSI, or with respect to the decommissioning of the former power generation facility, the shift manager position is no longer required and the proposed deletion of PDTS 5.1.2 is acceptable.

The licensee has proposed to revise PDTS 5.2, "Organization," which provides a description and requirements regarding onsite and offsite organizations and facility staffing, by relocating to the DQAP PDTS 5.2.1, "Onsite and Offsite Organizations"; except for the portion of PDTS 5.2.1.d related to individuals who train certified fuel handlers, which will be deleted, and by deleting PDTS 5.2.2, "Facility Staff." PDTS 5.2.1 provides a general discussion of the site organization, which assures safe facility operations and safety of the nuclear fuel. PDTS 5.2.1.b states that organizational responsibilities and relationships shall be documented in the UFSAR. The licensee proposes to revise this section to include the SONGS, Unit 1, DSAR, in order to reflect combining the TS for SONGS Units 1, 2, and 3, as a result of moving to the ISFSI-Only TS. The transfer of the administrative controls in PDTS 5.2.1 is consistent with the guidance in AL 95-06, is an administrative change that modifies the administrative controls to provide increased clarity, and is therefore acceptable. The portion of PDTS 5.2.1 to be deleted specifies requirements for individuals who train certified fuel handlers. Following the transfer of all spent fuel to the ISFSI, and the new prohibition from placing fuel in the SFPs, there will no longer be a need for certified fuel handlers; therefore this proposed deletion is acceptable. PDTS 5.2.2 currently specifies the organizations and positions for activities affecting the safe storage of irradiated fuel in the SFPs. The licensee's DQAP addresses any necessary organizational requirements for the fuel being stored in the ISFSI. Therefore, the deletion of PDTS 5.2.2, after the fuel has been moved to the ISFSI will have no impact given the organizational requirements set forth in the licensee's DQAP, and is therefore acceptable.

The licensee has proposed the relocation of PDTS 5.3, "Facility Staff Qualifications," which provides a description and requirements regarding qualifications of the facility staff, to the DQAP; except for PDTS 5.3.2, related to the certified fuel handler training program, which will be deleted. The transfer of the administrative controls in PDTS 5.3.1 is consistent with the guidance in AL 95-06, is an administrative change that that does not modify and of the administrative controls, and is therefore acceptable. PDTS 5.3.2 specifies requirements for a certified fuel handler training program. The ISFSI is a passive system that does not rely on electrical power for heat transfer. Upon removal of the spent fuel from the SFPs, there are no remaining spent fuel assemblies to be monitored and there are no credible spent fuel related accidents that require the actions of a certified fuel handler to prevent occurrence or mitigate the consequences. As such, following the transfer of all spent fuel to the ISFSI, and the new ISFSI-Only TS 4.3 prohibition from storing spent fuel in the SFPs, there will no longer be a need for certified fuel handlers, which eliminates the need for the associated training program. Therefore, the proposed deletion of PDTS 5.3.2 is acceptable.

The licensee has proposed to delete PDTS 5.4, "Technical Specifications Bases Control Program," which provides a description and requirements regarding the administration of written procedures and the process for changes to the TS Bases. Currently, the TS Bases are all related to storage of spent fuel in the SFPs, specifically the requirements in PDTS 3.1.1, PDTS 3.1.2, and PDTS 3.1.3, which the licensee would delete as described previously. In addition, the licensee has proposed the deletion of the Permanently Defueled Technical Specification Bases themselves in their entirety. Following transfer of all spent fuel to the SONGS ISFSI, the SFPs will no longer be used for spent fuel storage. Since all the associated TS Bases will no longer be needed, there will no longer be a need for a TS Bases Control Program. As such, the proposed deletion of PDTS 5.4 in its entirety, as well as the TS Bases in their entirety, is administrative in nature, will have no impact on the continued safe storage and maintenance of spent fuel in the ISFSI, and is therefore acceptable.

The licensee has proposed the relocation of PDTS 5.5, "Procedures, Programs, and Manuals," which provides a description and requirements regarding programs and manuals that are to be established, implemented, and maintained, to the DQAP or LCS, as appropriate, except for PDTS 5.5.1.1.a, which is to be deleted. The transfer of the administrative controls in PDTS 5.5 is consistent with the guidance in AL 95-06, is an administrative change that that does not modify those portions of PDTS 5.5 being relocated, which include the ODCM, the Radioactive Effluent Controls Program, and the Storage Tank Radioactivity Monitoring Program, and is therefore acceptable. PDTS 5.5.1.1.a specifies procedures applicable to the safe storage of nuclear fuel recommended in Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)" (Reference 29), which addresses safety-related activities carried out during the operation phase of nuclear power plants, including wet storage of nuclear fuel in a SFP. Following the transfer of all spent fuel to the ISFSI, and the new ISFSI-Only TS 4.3 prohibition from storing spent fuel in the SFPs, the RG 1,33 QA requirements related to SFPs will no longer be needed; therefore the proposed deletion of PDTS 5.5.1.1.a is acceptable.

The licensee has proposed to relocate PDTS 5.7, "Reporting Requirements," which provides a description and requirements regarding reports that are to be submitted in accordance with 10 CFR 50.4, "Written communications," to the LCS in its entirety. The sections of PDTS 5.7 include PDTS 5.7.1, "Routine Reports," PDTS 5.7.1.2, "Annual Radiological Environmental Operating Report", and PDTS 5.7.1.3, "Radioactive Effluent Release Report." The reports

required by PDTs 5.7.1.2 provide summaries, interpretations, and analyses of trends regarding the results of the Radiological Environmental Monitoring Program for the annual reporting period. The material provided in these reports is consistent with the objectives outlined in the ODCM, and Section IV.B.2, Section IV.B.3, and Section IV.C of Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low as is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents," to 10 CFR Part 50. The reports required by PDTs 5.7.1.3 provide a summary of the quantities of radioactive liquid and gaseous effluents released from the facility. The reports also include a summary of the quantities of solid radioactive waste shipped from the facility directly to the disposal site, and quantities of solid radioactive waste shipped from the intermediary processor to the disposal site. The material provided in these reports is consistent with the objectives outlined in the ODCM, and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.I. These regulatory requirements will be maintained when PDTs 5.7 is transferred to the SONGS LCS, and the appropriate oversight and implementation controls will remain in place to ensure that the necessary reporting requirements are met in the ISFSI-only configuration. As such, the transfer of the requirements in PDTs 5.7 is an administrative change that does not modify any of the administrative controls, and is therefore acceptable.

The licensee has proposed to revise and retain PDTs 5.8, "High Radiation Area," which provides a description and requirements regarding controls applied to high radiation areas in place of the controls required by 10 CFR 20.1601(a) and (b) (as provided in 10 CFR 20.1601(c)), because the requirements will remain applicable with all spent fuel stored in the SONGS ISFSI. The revisions will change the term "Radiation Exposure Permit (REP)" to "Radiation Work Permit (RWP)," which reflects more commonly used language within the industry, and is an administrative change. In addition, the proposed changes allow an equivalent process to the RWP process to provide additional flexibility for future changes to the permitting process as the site moves through decommissioning. This change is consistent with the description of the RWP process in NUREG-1432, as well as the guidance in RG 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants" (Reference 30), and is therefore acceptable. The revisions to PDTs 5.8 will also allow a designee for the radiation protection supervisor, which provides additional flexibility and is consistent with NUREG-1432, and is therefore acceptable.

The administrative controls described in PDTs Section 5.0 that are required to be in place when decontamination and dismantlement activities of radioactive systems, structures, and components are being performed are designed to minimize the likelihood of an off-normal or accident event, and thereby the consequences of such an event. As such, the proposed changes to this section and relocation of certain requirements to the SONGS DQAP and LCS do not have an adverse impact on the remaining decommissioning activities or any of their postulated consequences because the requirements will continue to be controlled in accordance with NRC-approved change mechanisms such as 10 CFR 50.59 and 10 CFR 50.54(a). In addition to the above, other editorial changes were proposed by the licensee to facilitate the transfer of the PDTs requirements to the DQAP and to delete section numbers which were deleted by prior amendments. These changes are administrative in nature and are acceptable.

The licensee also proposed to make conforming changes to the SONGS, Unit 1, TS in order to combine them with the SONGS, Units 2 and 3, ISFSI-Only TS. These changes apply to Unit 1 TS Sections D1, D5, and D6, all of which have already been revised to reflect the removal of

fuel from the SONGS, Unit 1, SFP. According to the licensee's submittal, there are two main differences between the SONGS, Unit 1, TS and the SONGS, Units 2 and 3, TS. The first difference is that Unit 1 was a Westinghouse plant while Units 2 and 3 are Combustion Engineering Plants. In the operating phase, this meant that there were significant differences in the TS due to the design differences between Unit 1 and Units 2 and 3. However, in the ISFSI-only phase, the remaining TS requirements are administrative, and in many cases are consistent across the site. Therefore, combining the SONGS, Units 1, 2, and 3, TS from the two different designs will provide a consistent set of requirements for the entire facility.

The second difference is that while the SONGS, Units 2 and 3, TS went through an Improved Technical Specification conversion during the mid-1990s, SONGS, Unit 1, was permanently shutdown at that time, and the Unit 1 TS remain in a "custom" TS format. As a result, many administrative requirements that were relocated out of the Units 2 and 3 TS and placed in a licensee controlled document as part of the ITS conversion still appear in the Unit 1 TS. For SONGS, Units 2 and 3, most relocated requirements were placed in a document called the Licensee Controlled Specifications, which is incorporated by reference into the Units 2 and 3 UFSAR, Chapter 16, and therefore controlled under 10 CFR 50.59. Since the time of the original relocation, several of the administrative controls that had been relocated from SONGS, Units 2 and 3, TS to the LCS have been further relocated to procedures and program documents. This was justified on the basis that 10 CFR 50.59 generally does not apply to administrative requirements. In addition, 10 CFR 50.59(c)(4) provides that when applicable regulations establish more specific criteria for controlling certain changes, 10 CFR 50.59 does not also apply. For consistency with this approach, the licensee's proposed changes would relocate several administrative requirements from the SONGS, Unit 1, TS directly to procedures. This would provide a consistent approach for documenting, retaining, and evaluating changes to such requirements across all three SONGS units.

The NRC staff reviewed all of the proposed changes to the SONGS, Unit 1, TS, and although a specific discussion of each proposed change is not provided in this safety evaluation, the justification made for the subsequent deletions, revisions, and relocations to the Unit 1 TS described in the licensee's submittal are identical to those applied to Units 2 and 3. Therefore, given the description and analysis provided above for SONGS, Units 2 and 3, and in light of the fully dismantled condition of the SONGS, Unit 1, facility with storage of all associated spent fuel in the onsite ISFSI, the NRC staff has concluded that the conforming changes to the SONGS, Unit 1, TS are administrative in nature and acceptable.

3.4 Conclusion

Based on the NRC staff's review of the SONGS ISFSI-Only TS, as described above, the NRC staff concludes that the requirements of 10 CFR 50.36, pertaining to the prevention of accidents and the mitigation of accident consequences, are addressed in a satisfactory manner, considering the permanently shutdown and defueled status of the facility, and the proposed transfer of all remaining spent fuel from the SONGS SFPs to the ISFSI by 2019.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments to the SONGS 10 CFR Part 50 facility operating licenses include changes to requirements with respect to installation or use of a facility component located within the

protected area, as well as changes to recordkeeping, reporting, or administrative procedures or requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there have been no public comments on such finding, which was published in the *Federal Register* on February 14, 2017 (82 FR 10600). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22 (c)(9) and 10 CFR 51.22(c)(10)(ii). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 STATE CONSULTATION

On December 7, 2017, the NRC staff notified the California State officials, Mr. Ira Schneider, Senior Health Physicist, Medical, Academic and Pharmacy Licensing, Radiologic Health Branch, California Department of Public Health; and Mr. Robert Weisenmiller, California State Liaison Officer, Commissioner, California Energy Commission, regarding the proposed changes to the SONGS Technical Specifications to reflect the transfer of all spent fuel into dry cask storage at the onsite ISFSI, and the NRC staff's intent to approve the SONGS ISFSI-Only TS via license amendments. The California State officials responded via email on December 15, 2017, with no comments.

6.0 CONCLUSION

Based on its review of the proposed SONGS ISFSI-Only TS, the NRC staff finds that the proposed changes continue to meet the standards in 10 CFR 50.36. The changes proposed by this license amendment request will delete requirements that are rendered not applicable following the transfer of all spent nuclear fuel to the SONGS ISFSI, as well as relocate administrative controls consistent with NRC Administrative Letter 95-06. On the basis of its review, the NRC staff concluded that the licensee's request will adequately address the regulatory safety requirements for a permanently shutdown nuclear power facility with the spent nuclear fuel transferred to dry cask storage in an ISFSI. Therefore, the NRC staff concludes that the licensee's proposed SONGS ISFSI-Only Technical Specifications, as described in its letter dated December 15, 2016, are acceptable.

The NRC staff has also concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. Letter from the U.S. Nuclear Regulatory Commission, "Southern California Edison Company, et al, Docket No. 50-206, Issuance of Facility Operating License No.

DPR-13," dated September 26, 1991 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13309A138).

2. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket No. 50-206, Request for Exemption from Full Funding Requirements of 10 CFR 50.75(e)(1)(ii), San Onofre Nuclear Generating Station, Unit 1," dated November 30, 1992 (ADAMS Accession No. ML13319B040).
3. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket No. 50-206, Certification of Permanently Defueled Status, San Onofre Nuclear Generating Station, Unit 1," dated March 8, 1993 (ADAMS Accession No. ML13319B055).
4. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket No. 50-206, Post Shutdown Decommissioning Activities Report, San Onofre Nuclear Generating Station, Unit 1," dated December 15, 1998 (ADAMS Accession No. ML13319B111).
5. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "Issuance of Amendment No. 155 for Facility Operating License No. DPR-13, San Onofre Nuclear Generating Station, Unit No. 1, Permanently Defueled Technical Specifications (TAC No. M86377)," dated December 28, 1993 (ADAMS Accession No. ML13319B059).
6. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket No. 50-206, Proposed Decommissioning Plan, San Onofre Nuclear Generating Station, Unit 1," dated November 3, 1994 (ADAMS Accession No. ML13319B073).
7. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket No. 50-206, Post Shutdown Decommissioning Activities Report, San Onofre Nuclear Generating Station, Unit 1," dated December 15, 1998 (ADAMS Accession No. ML13184A353).
8. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "San Onofre Nuclear Generating Station, Unit 1 - Issuance of Amendment Upon Transfer of All Spent Fuel Storage From The Spent Fuel Pool Into Dry Cask Storage (TAC No. L52616)," dated September 22, 2004 (ADAMS Accession No. ML042660363).
9. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket Nos. 50-361 and 50-362, Certification of Permanent Cessation of Power Operations, San Onofre Nuclear Generating Station, Units 2 and 3," dated June 12, 2013 (ADAMS Accession No. ML131640201).
10. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket No. 50-362, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 3," dated June 28, 2013 (ADAMS Accession No. ML13183A391).

11. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket No. 50-361, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 2," dated July 22, 2013 (ADAMS Accession No. ML13204A304).
12. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket Nos. 50-361 and 50-362, Post-Shutdown Decommissioning Activities Report, San Onofre Nuclear Generating Station, Units 2 and 3," dated September 23, 2014 (ADAMS Accession No. ML14272A121).
13. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "San Onofre Nuclear Generating Station, Units 2 and 3 – Review of Post-Shutdown Decommissioning Activities Report (TAC NOS. MF4892 AND MF4893)," dated August 20, 2015 (ADAMS Accession No. ML15204A383).
14. Letter from Southern California Edison to the U.S. Nuclear Regulatory Commission, "Docket Nos. 50-361, 50-362, and 50-206, Amendment Applications 225, 272, and 257, Independent Spent Fuel Storage Installation (ISFSI) Only Technical Specifications, San Onofre Nuclear Generating Station, Units 1, 2, and 3," dated December 15, 2016 (ADAMS Accession No. ML16355A014).
15. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "San Onofre Nuclear Generating Station, Units 2 and 3 – Issuance of Amendment for Permanently Shutdown and Defueled Operating License and Technical Specifications (TAC NOS. MF3774 AND MF3775)," dated July 17, 2015 (ADAMS Accession No. ML15139A390).
16. NRC Final Rule, "Technical Specification for Facility Licenses; Safety Analysis Reports," dated December 17, 1968 (33 FR 18610).
17. NUREG-1431, "Standard Technical Specifications – Westinghouse Plants," Revision 0, dated September 1992.
18. NUREG-1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 0, dated September 1992.
19. SECY-93-067, "NRC Policy Issue Notation Vote on the Final Policy Statement on Technical Specifications Improvements," dated March 17, 1993 (ADAMS Accession No. ML15119A421).
20. Letter from the U.S. Nuclear Regulatory Commission to the Nuclear Steam Supply System Owners Groups, known as the "Split Report," dated May 9, 1988.
21. NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 22, 1993 (58 FR 39132).
22. NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995.

23. American National Standards Institute (ANSI) Standard N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," dated January 1976.
24. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "San Onofre Nuclear Generating Station, Units 1, 2, and 3 and the Independent Spent Fuel Storage Installation – Review of Changes to the Decommissioning Quality Assurance Program (TAC NOS. MF5215, MF5216, AND MF5217)," dated August 10, 2015 (ADAMS Accession No. ML15191A461).
25. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "Issuance of Amendment for San Onofre Nuclear Generating Station, Unit No. 2 (TAC No. M86191) and Unit No. 3 (TAC No. M86192)," dated February 9, 1996 (ADAMS Accession No. ML021990684).
26. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "San Onofre Nuclear Generating Station, Units 2 and 3 – Conforming License Amendments to Incorporate the Mitigation Strategies Required by Section B.5.b of Commission Order EA-02-026 (TAC NOS. MD4564 AND MD4565)," dated July 26, 2007 (ADAMS Accession No. ML072060009).
27. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "Issuance of Order for Interim Safeguards and Security Compensatory Measures for San Onofre Nuclear Generating Station, Units 2 and 3," dated February 25, 2002 (ADAMS Accession No. ML020490023).
28. Letter from the U.S. Nuclear Regulatory Commission to Southern California Edison, "Rescission or Partial Rescission of Certain Power Reactor Security Orders Applicable to Nuclear Plants," dated November 28, 2011 (ADAMS Accession No. ML111220447).
29. NRC Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," Revision 2, dated February 1978 (ADAMS Accession No. ML003739995).
30. NRC Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," Revision 1, dated May 2006 (ADAMS Accession No. ML061350096)

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