



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

May 20, 2020

EA-14-140

Mr. Doug Bauder  
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: CORRECTION OF TYPOGRAPHICAL ERRORS - ISSUANCE OF  
AMENDMENT NOS. 225 AND 230, TO FACILITY OPERATING LICENSE NO.  
NPF-15 FOR THE SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3,  
DATED MAY 20, 2020

Dear Mr. Bauder:

On January 5, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15027A221 (pkg.)), the U.S. Nuclear Regulatory Commission (NRC) issued a confirmatory order and conforming Amendment No. 232 to Facility Operating License No. NPF-10 and Amendment No. 225 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. The confirmatory order and conforming amendments are in response to a letter from Southern California Edison (SCE or the licensee) dated August 28, 2013 (ADAMS Accession No. ML13242A277), as supplemented by letters dated December 31, 2013, May 15, 2014, and February 10, 2015 (ADAMS Accession Nos. ML14007A496, ML14139A424, and ML15044A047, respectively). The confirmatory order and conforming amendments permit security personnel at SONGS to transfer, receive, possess, transport, import, and use certain firearms and large capacity ammunition feeding devices not previously permitted to be owned or possessed under Commission authority, notwithstanding certain local, State, or Federal firearms laws, including regulations that prohibit such actions.

A typographical error was identified in Amendment No. 225, Unit 3 (NPF-15) (ADAMS Accession No. ML15027A230) in provision 2.B.(6) on page 7. Provision 2.B.6 incorrectly states the following:

- (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.

Amendment No. 225 for Unit 3 has nothing to do with possession of byproduct or special nuclear material. Further, no changes to license provision 2.B.(6) were proposed by SCE in the request that lead to Amendment 225. Provision 2.B.(6) applies to such byproduct and special nuclear materials as may be produced by the operation of SONGS Units 1 and 3 not Units 1 and 2, as well as and by the decommissioning of SONGS Unit 1.

The license was changed, as reflected in the wording of provision 2.B.(6) before the issuance of Amendment No. 225, as follows:

- (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 3 and by the decommissioning of San Onofre Nuclear Generating Station Unit 1.

On January 9, 2018 (ADAMS Accession No. ML17345A657), the NRC issued 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 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 (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 2020.

However, a typographical error was identified in Amendment No. 230 for Unit 3 (NPF-15). Specifically, on page 7, provision D of the license, a period was introduced after the words "Safety Evaluation" making "Report." hang at the beginning of the next page, page 8, and thereby making it appear to not be part of a sentence. Provision D, as issued via amendment No. 230, spans two pages in the license, with the page break coming mid-sentence. Provision D, in Amendment No. 230 for Unit 3, incorrectly states the following:

- 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.

This correction is needed because Provision D continues with page 8, as follows:

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.

The license was changed, as reflected in the wording of provision D, page 7, before the issuance of Amendment No. 230, as follows:

- 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

It can be demonstrated that the errors were introduced inadvertently in license amendment Nos. 225 and 230, were not requested by the licensee in its applications, and that the erroneous changes were not addressed in the notice to the public nor reviewed by the staff. Under these circumstances, the changes that introduced the typographical errors were not proper amendments to the license because they were neither addressed in the notices nor reviewed, and correction of the typographical error is not a "change" to the staff's determination of no significant hazards or conclusions in its safety evaluation reports (ADAMS Nos. ML15027A239

and ML17345A657 (enclosure 4)), respectively. The changes introduced by the errors were in fact improperly made.

Accordingly, consistent with guidance (ADAMS Accession No. ML103260096) and Staff Requirements Memorandum dated December 17, 1996 (ADAMS Accession No. ML003754054), the typographical errors are corrected by this letter, instead of an amendment to the license.

A copy of the changed pages with the typographical errors corrected for License No NPR-15 is enclosed and is effective immediately.

If you have any questions, please contact me.

Sincerely,

Amy M. Snyder, Senior 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  
Enclosure:  
License NPF-15 Typographical Corrections

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SUBJECT: CORRECTION OF TYPOGRAPHICAL ERRORS - ISSUANCE OF  
AMENDMENT NOS. 225 AND 230, TO FACILITY OPERATING LICENSE NO.  
NPF-15 FOR THE SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3,  
**DATE: May 20, 2020**

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**ADAMS Accession No. ML20133J906**

\* via email

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ENCLOSURE: TYPOGRAPHICAL CORRECTIONS TO PAGE 3 and 7 OF  
NRC LICENSE NO. NPR-15 (UNIT 3, SAN ONOFRE GENERATING STATION)

- (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 3 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. 231, 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