

**From:** N. Kaly Kalyanam  
**To:** Derrick.Mercurio@sce.com; Linda Conklin  
**Date:** 04/18/2007 2:56:31 PM  
**Subject:** Re: PCN 556-RAI Related to Criticality Analysis & TS/LCS/Bases Changes

Derrick,

Please see below two more issues that need to be discussed.

Please let me know if you can get your engineers ready for a call on Thursday, say 3.00 PM, our time, OR Friday, April 20, at 11.00 AM, our time?

Thanks

Kaly

Followup RAI to Question 6 - CEA Life Time Analysis

CEAs were credited in the criticality analysis. How long do you have to take this credit? How do you know that the neutron absorber (AgInCd) inventory in the CEAs is sufficient as this credit is needed?

The questions are also applied to the GT- Inserts with the neutron absorber of B-10. In addition, confirmed that the credit of GT-Inserts was previously approved by NRC for the criticality analysis.

One more issue to be discussed with the licensee. The issue is as follows.

Section 4.5 of the criticality analysis report specifies the limitations for locations of fuel assemblies in the spent fuel pools to meet the reactivity requirements used in the criticality analysis. Discuss the control programs and plant procedures to assure that the the worst fuel misloading case is limited to the single assembly misloading event, which is the worst design basis event considered in the criticality analysis.

>>> <Derrick.Mercurio@sce.com> 04/17/2007 6:29 PM >>>

Kaly,

Because we need to change the TS pages, SCE will be submitting a supplement to the Amendment Request which will include a revision to PCN 556. All changes will be marked with a rev bar in the margin and will be labeled "Rev. 1." That should make it easy to review. We will also state in the cover letter that the revision does not affect the "no significant hazards determination."

Since the answer to question 4 requires a revision to the criticality analysis provided in Attachment L of the April 28, 2006 submittal, Revision 1 to PCN 556 will include the criticality analysis as Revision 2, dated April 2007. This change also affects the proposed Reference on page 4.0-100-64, as the April 28, 2006 letter will no longer be appropriate. The Reference will be:

"Spent Fuel Pool Criticality Analysis, (with no Boraflex and Credit for

Soluble Boron), Southern California Edison, San Onofre Nuclear Generating Station Units 2 and 3, Revision 2, April 2007."

The attached file contains the draft answers to the 15 questions. However, because of the need to revise the PCN and submit a supplement to the Amendment Applications, we now anticipate making the formal submittal on or before April 30, 2007.

(See attached file: PCN556 Sup 1 DRAFT.doc)

Please let us know if you have any questions.

Derrick Mercurio  
San Onofre  
949/368-7562

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