SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

Dwight E. Nunn
Vice President

May 8, 1996

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Amendment Application Nos. 157 and 141
Change to Technical Specification 3.9.4 "Shutdown Cooling (SDC) and Coolant Circulation -- High Water Level" and Technical Specification 3.9.5, "Shutdown Cooling (SDC) and Coolant Circulation -- Low Water Level"
San Onofre Nuclear Generating Station
Units 2 and 3

References:
1) **Letter from Mel B. Fields (NRC) to Harold B. Ray (Edison) dated February 15, 1995; Subject: Issuance of Amendment for San Onofre Nuclear Generating Station, Unit No. 2 (TAC No. M90057) and Unit 3 (TAC No. M90058)**

2) **Proposed Change Number 402, Submitted by letter from R. M. Rosenblum (Edison) to Document Control Desk (NRC) dated July 28, 1994, and Supplemented by letters dated January 30, and February 13, 1995; Subject: Request to revise Technical Specification (TS) 3.9.8.1 "Shutdown Cooling and Coolant Circulation -- High Water Level," TS 3.9.8.2 "Shutdown Cooling and Coolant Circulation -- Low Water Level," and the Refueling Operations, Bases: 3/4.9.8 "Shutdown Cooling and Coolant Circulation."**

Enclosed are Amendment Application Numbers 157 and 141 to Facility Operating Licenses NPF-10 and NPF-15, respectively, for the San Onofre Nuclear Generating Station Units 2 and 3. These amendment applications consist of Proposed Change Number 458 (PCN-458). PCN 458 is a request to revise the Unit 2 Amendment No. 127 and the Unit 3 Amendment No. 116 approved Technical Specification (TS) 3.9.4 and TS 3.9.5. Revisions to the Bases B 3.9.4 and B 3.9.5 are provided for information.

The purpose of TS 3.9.4 and TS 3.9.5 is to ensure that: 1) sufficient cooling is available to remove decay heat from the Reactor Coolant System, 2) water in the reactor vessel is maintained below 140°F, and 3) sufficient coolant circulation is maintained in the reactor core to minimize boron stratification leading to a boron dilution incident.

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While not affecting the purpose of the TSs, PCN 458 requests changes which will facilitate testing of Low Pressure Safety Injection System components and will permit additional flexibility in scheduling maintenance on the shutdown cooling system.

The specific requests made by PCN-458 are as follows:

1) Reduce the water level in the reactor cavity when two loops of shutdown cooling (SDC) are required from 23 feet to 20 feet above the reactor pressure vessel flange,

2) Increase the time a required loop of the SDC system may be removed from service from up to 1 hour per 8-hour period to up to 2 hours per 8-hour period, provided the upper guide structure has been removed from the reactor pressure vessel,

3) Allow for running only 1 loop of shutdown cooling with additional requirements when the water level in the reactor cavity is less than 20 feet but greater than 12 feet above the reactor pressure vessel flange,

4) Add an action to be taken when operating only 1 loop of SDC with less than 20 feet of water above the reactor pressure vessel flange when the specified requirements are not met, and

5) Make editorial changes.

Parts of this request for a TS change were made possible due to a design change which allows the SDC system to be cross-tied with the containment spray system. The NRC approved the cross-tie design change by License Amendments 106 and 95 for Units 2 and 3, respectively. Now that this capability exists, cost savings due to reduced outage times are possible.

By a letter dated February 15, 1995, reference 1, the NRC issued Amendment Nos. 116 and 105 to Facility Operating License Nos. NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station Units 2 and 3, respectively. These amendments were issued for the Cycle 8 refueling outages only in response to amendment applications consisting of PCN 402, reference 2. PCN 458 is similar to PCN 402, however, PCN 458 requests a permanent change to the technical specifications.

Although Amendment Nos. 116 and 105 were issued in time for use during the Cycle 8 refueling outages, emergent turbine generator work caused the outage plans to change. Early in the outage it became apparent that the turbine generator work would determine the length of the outage. Because utilizing the new technical specifications would not result in shortening the length of the Cycle 8 refueling outages, Southern California Edison (Edison) decided to maintain the more conservative limits of the original/current technical specifications.

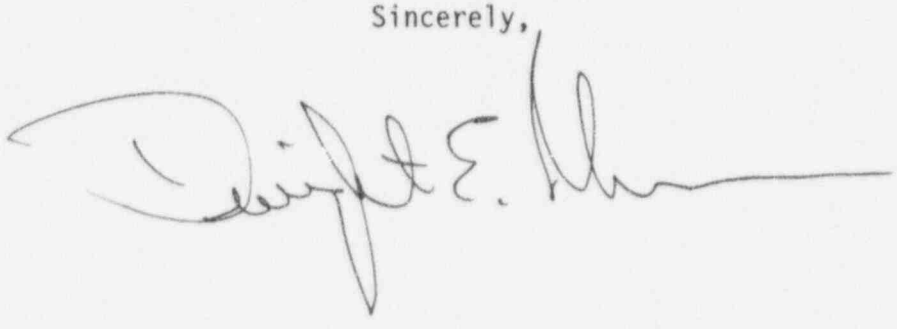
Even though Edison was not able to take advantage of the proposed changes during the Cycle 8 refueling outages, Edison still believes the proposed

changes will normally allow the required outage maintenance and testing to be scheduled and performed in a cost effective way. These proposed TS changes will potentially save Edison, et al., between 14 and 48 hours of critical path time during future refueling outages. The savings will exceed the minimum criteria of $100,000 over the remaining life of the plant(s) established for a Cost Beneficial Licensing Action (CBLA) submittal. Therefore, these amendment applications are considered a CBLA.

Edison requests approval of Amendment Application Numbers 157 and 141 to be effective as of the date of issuance, and to be implemented within 30 days from the date of issuance. This will provide adequate time for the necessary procedure changes and training on the new Technical Specifications.

If you need additional information on this Technical Specification change request, please let me know.

Sincerely,



Enclosure

cc: L. J. Callan, Regional Administrator, NRC Region IV
J. E. Dyer, Director, Division of Reactor Projects, Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
H. Kocol, California State Department of Health Services