

July 7, 2000

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

Subject: **Docket Nos. 50-361 and 50-362**  
**Clarification To a Request To Revise Control Element Assembly**  
**Reactivity Worth Test Methodology**  
**San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 & 3)**

Reference: Letter dated February 23, 2000 from D. E. Nunn (SCE) to Document Control Desk (USNRC), Subject: Docket Nos. 50-361 and 50-362, Proposed Change Number NPF-10/15-508, Control Element Assembly Reactivity Worth Test Methodology, San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

The purpose of this letter is to provide a clarification of the proposed test methodology option set forth in the referenced letter.

The proposed methodology provides an option regarding measurement of the reactivity worth of control element assembly (CEA) groups for SONGS 2 & 3 during Low Power Physics Testing following a refueling. The proposed option involves measuring the worth of approximately 3/4 of the full-length CEA groups each refueling cycle rather than the present methodology, which measures the worth of all full-length CEA groups each refueling cycle. Measured CEA groups would be rotated such that each full-length group would be measured at least every other refueling.

The referenced submittal stated our expectation that the total CEA worth measured after each refueling under the proposed methodology option would exceed 3000 pcm. We wish to clarify that Southern California Edison (SCE) is committing to measure total CEA group worth of at least 3000 pcm each refueling outage.

We would like to utilize the proposed methodology during the next refueling outage scheduled for October, 2000. We would appreciate a response on this by August 31, 2000.

July 7, 2000

If you have any further questions regarding the proposed test program, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Dwight E. Sloan". The signature is fluid and cursive, with a long horizontal stroke at the end.

cc: S. Y. Hsu, Department of Health Services, Radiologic Health Branch,  
State of California  
E. W. Merschhoff, Regional Administrator, NRC Region IV  
R. R. Assa, NRC Acting Project Manager, San Onofre Units 2 and 3  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA )  
EDISON COMPANY, ET AL. for a class 103 )  
License to Acquire, Possess, and Use )  
a Utilization Facility as Part of )  
Unit No. 2 of the San Onofre Nuclear )  
Generating Station )

Docket No. 50-361  
Amendment Application  
No. 197 Clarification

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.59 and 10CFR50.90, hereby submit a clarification to Amendment Application No. 197. The amendment application consists of a request to conduct a test not described in the safety analysis report which involves an unreviewed safety question. The proposed test would provide optional methodologies for measuring control element assembly reactivity worth and inverse boron reactivity worth. This submittal clarifies that control element assembly bank worths of 3000 pcm or more will be measured each refueling outage.

Subscribed on this 7<sup>th</sup> day of July, 2000.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn  
Dwight E. Nunn  
Vice President

State of California  
County of San Diego

On 7/7/2000 before me, Frances M. Thurber  
personally appeared Dwight E. Nunn, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Frances M. Thurber



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Application of SOUTHERN, CALIFORNIA )  
EDISON COMPANY, ET AL. for a class 103 )  
License to Acquire, Possess, and Use )  
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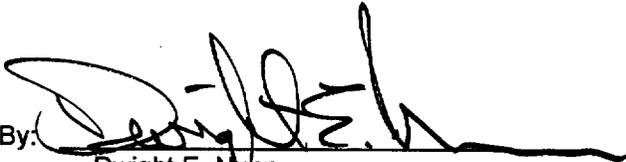
Docket No. 50-362  
Amendment Application  
No. 182 Clarification

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.59 and 10CFR50.90,  
hereby submit a clarification to Amendment Application No. 182. The amendment application consists of  
a request to conduct a test not described in the safety analysis report which involves an unreviewed  
safety question. The proposed test would provide optional methodologies for measuring control element  
assembly reactivity worth and inverse boron reactivity worth. This submittal clarifies that control element  
assembly bank worths of 3000 pcm or more will be measured each refueling outage.

Subscribed on this 7<sup>th</sup> day of July, 2000.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:   
Dwight E. Nunn  
Vice President

State of California  
County of San Diego

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proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within  
instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his  
signature on the instrument the person, or the entity upon behalf of which the person acted, executed the  
instrument.

WITNESS my hand and official seal.

Signature Frances M. Thurber

