

Docket Nos.: 50-361
and 50-362

MAY 4 1984

Mr. Kenneth P. Baskin
Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

Mr. James C. Holcombe
Vice President - Power Supply
San Diego Gas & Electric Company
101 Ash Street
Post Office Box 1831
San Diego, California 92112

Gentlemen:

Subject: Proposed Change Limiting Applicability of Technical Specification
3.0.4

By letter dated April 15, 1983, you requested that the San Onofre 2 and 3 Technical Specifications be modified to forestall the applicability of Technical Specification 3.0.4 until one month after first achieving 100% power (reference proposed change PCN-54). Since both units have been at 100% power for more than a month, the proposed changes are now moot. However, as we have discussed with your staff on several occasions, the proposed changes were not approved because we do not believe it appropriate to waive T.S. 3.0.4 during startup testing.

Technical Specification 3.0.4 prohibits entry into an OPERATIONAL MODE or other specified condition unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in ACTION requirements. It is, in our opinion, particularly important to meet the requirements of this Technical Specification during startup testing, when the initial shakedown of equipment, procedures, and operators is occurring.

Sincerely,

Original signed by
George W. Knighton

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

cc: See next page

DISTRIBUTION
~~Docket File 50-361/362~~

NRC PDR
Local PDR
NSIC
PRC System
LB#3 Reading
JLee
HRood
CThomas
EJordan
NGrace

ACRS (16)

HR
DL:LB#3
HRood/yt
4/30/84

DAB 5/2/84
SSPB
[Signature]
CThomas
5/2/84

DL: *[Signature]*
G.W. Knighton
5/01/84

8405210383 840504
PDR ADOCK 05000361
P PDR

Attorney, OELD

San Onofre

Mr. Kenneth P. Baskin
Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
P. O. Box 800
Rosemead, California 91770

Mr. James C. Holcombe
Vice President - Power Supply
San Diego Gas & Electric Company
101 Ash Street
Post Office Box 1831
San Diego, California 92112

Charles R. Kocher, Esq.
James A. Beoletto, Esq.
Southern California Edison Company
2244 Walnut Grove Avenue
P. O. Box 800
Rosemead, California 91770

Orrick, Herrington & Sutcliffe
ATTN: David R. Pigott, Esq.
600 Montgomery Street
San Francisco, California 94111

Alan R. Watts, Esq.
Rourke & Woodruff
Suite 1020
1055 North Main Street
San Clemente, California, 92701

Mr. V. C. Hall
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, Connecticut 06095

Mr. S. McClusky
1450 Maria Lane/Suite 210
Walnut Creek, California 94596

Mr. C. B. Brinkman
Combustion Engineering, Inc.
7910 Woodmont Avenue
Bethesda, Maryland 20814

Mr. Dennis F. Kirsh
U.S. Nuclear Regulatory Commission - Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Mr. Mark Medford
Southern California Edison Company
2244 Walnut Grove Avenue
P. O. Box 800
Rosemead, California 91770

Mr. Henry Peters
San Diego Gas & Electric Company
P. O. Box 1831
San Diego, California 92112

Richard J. Wharton, Esq.
University of San Diego School of
Law
Environmental Law Clinic
San Diego, California 92110

Charles E. McClung, Jr., Esq.
Attorney at Law
24012 Calle de la Plaza/Suite 330
Laguna Hills, California 92653

Region Administrator-Region V/NRC
1450 Maria Lane/Suite 210
Walnut Creek, California 92672

Resident Inspector, San Onofre NPS
c/o U. S. NRC
Post Office Box 4329
San Clemente, California 92672