



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO PCN-241, REQUEST TO DELETE NUCLEAR

SAFETY GROUP REVIEW RESPONSIBILITIES

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated August 11, 1988, Southern California Edison Company (SCE) or the licensee requested a change to the Technical Specifications for Facility Operating License Nos. NPF-10 and NPF-15 that authorize operation of San Onofre Nuclear Generating Station (SONGS), Units 2 and 3 in San Diego County, California.

2.0 EVALUATION

The proposed change would delete both TS Section 6.5.3.4.a, which requires the Nuclear Safety Group (NSG) to review the safety evaluations for (1) changes to procedures required by Specification 6.8, equipment, or systems and (2) tests or experiments completed under 10 CFR 50.59; and TS Section 6.5.3.4.g, which requires the NSG to review events requiring 24 hour written notification to the Commission. The licensee based this request upon the extensive technical and managerial review which these items receive by station personnel. The NSG review is considered by the licensee to be redundant and to divert resources from other functions of the NSG.

The function of the NSG, as stated in the Technical Specifications, is to provide an independent review and audit of designated activities in specific functional areas. Both the Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors (NUREG-0212) and American National Standard ANS-3.2/ANSI 18.7-1976, which was endorsed by Reg Guide

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1.33, call for review of activities described in TS 6.5.3.4.a and 6.5.3.4.g to be performed independent of the plant staff. At San Onofre this review is performed by the NSG. The staff considers these to be essential functions which cannot be eliminated. The purpose of the NSG review described in Section 6.5.3.4.a is to verify that the changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). The purpose of the review described in Section 6.5.3.4.g is to prevent or reduce the probability of recurrence. For both purposes it is important that the review be performed by a group separate from the plant to ensure objectivity and independence. Therefore, the justification that these issues receive extensive technical and managerial review by station personnel is not acceptable. Because the licensee's proposed amendment provides no means of performing these important functions, the request for license amendment is denied.

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