

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-361
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 2 of the San Onofre Nuclear)	No. 77
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 77.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-285 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-285 is a request to revise Technical Specification 6.2.2.g, "Unit Staff," to explicitly require that the individual assigned to be the Assistant Plant Superintendent maintains a senior reactor operator license.

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Subscribed on this 14th day of February, 1989.

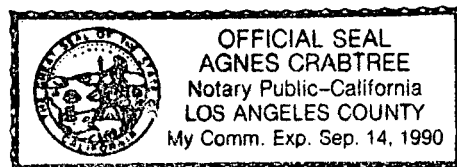
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Wm. P. Bush

Subscribed and sworn to before me this
14th day of February 1989.

Agnes Crabtree
Notary Public in and for the County of
Los Angeles, State of California



Charles R. Kocher
James A. Beoletto
Attorneys for Southern
California Edison Company

By: James A. Beoletto

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Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-362
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 3 of the San Onofre Nuclear)	No. 63
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 63.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-285 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-285 is a request to revise Technical Specification 6.2.2.g, "Unit Staff," to explicitly require that the individual assigned to be the Assistant Plant Superintendent maintains a senior reactor operator license.

Subscribed on this 14th day of February, 1989.

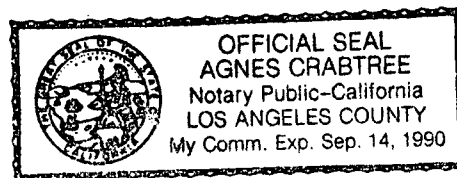
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: *Donna P. Pashin*

Subscribed and sworn to before me this
14th day of February 1989.

Agnes Crabtree
Notary Public in and for the County of
Los Angeles, State of California



Charles R. Kocher
James A. Beoletto
Attorneys for Southern
California Edison Company

By: *James A. Beoletto*

DESCRIPTION AND SAFETY ANALYSIS OF
PROPOSED CHANGE NPF-10/15-285

This is a request to revise Technical Specification 6.2.2.g, "Unit Staff."

EXISTING SPECIFICATIONS:

Unit 2: See Attachment "A"
Unit 3: See Attachment "C"

PROPOSED SPECIFICATIONS:

Unit 2: See Attachment "B"
Unit 3: See Attachment "D"

DESCRIPTION:

The proposed change would revise Technical Specification 6.2.2.g relating to unit staff to explicitly require that the Assistant Plant Superintendent for Units 2 and 3 maintain a senior reactor operator (SRO) license. 10 CFR 50.54(1) requires that individuals who are designated to be responsible for directing the licensed activities of licensed operators, maintain a senior reactor operator license. The Units 2 and 3 Assistant Plant Superintendent is the individual designated to be responsible for directing the licensed activities of licensed operators for San Onofre Nuclear Generating Station Units 2 and 3. Accordingly, the individual assigned to this position maintains an SRO license.

Technical Specification 6.2.2.g currently does not identify or address the license requirements for the Assistant Plant Superintendent position. The proposed change will modify Section 6.2.2.g to explicitly require that the Assistant Plant Superintendent hold an SRO license. The Assistant Plant Superintendent reports to the Plant Superintendent. Since the Assistant Plant Superintendent maintains an SRO license, the Plant Superintendent is not required to maintain a license. This organizational structure is consistent with paragraph 4.2.2 of ANSI/ANS-3.1-1987 (ANSI N18.1).

Although the Plant Superintendent does not maintain a license, SCE requires that individual to hold an SRO license at the time of appointment in accordance with Technical Specifications Section 6.2.2.g, and to participate in SCE's Senior Operations Management Continuing Training Program. The purpose of the program is to broaden overall knowledge of plant processes and equipment, and includes limited participation in operator requalification and simulator training, the required reading program and observation or administration of at least one in-plant oral examination and one operator simulator evaluation associated with the Licensed Operator Requalification Program.

SAFETY ANALYSIS

The proposed changes discussed shall be deemed to involve a significant hazards consideration if there is a positive finding in any one of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change defines the unit staff positions for which the assigned individual is required to maintain a senior reactor operator license, more explicitly than the existing Technical Specifications. The proposed change represents a more rigorous control. Therefore, the proposed change does not involve a significant increase in the probability or consequences of any previously analyzed accident.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not modify the facility or the manner in which it operates. It more explicitly defines administrative controls governing the unit staff positions for which a senior reactor operator license must be maintained, to be consistent with the regulations. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

The proposed change would implement enhanced administrative controls as described above. It therefore does not involve a reduction in a margin of safety.

SAFETY AND SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the preceding analysis, it is concluded that: (1) the proposed change does not involve a significant hazards consideration as defined by 10 CFR 50.92; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT "A"
UNIT 2 EXISTING SPECIFICATIONS

ADMINISTRATIVE CONTROLS

UNIT STAFF

- 6.2.2 a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room area identified as such on Table 6.2-1.
- c. A health physics technician[#] shall be on site when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times.[#] The Fire Brigade shall not include the Shift Supervisor and the 2 other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- f. Reserved.
- g. The Plant Superintendent (at time of appointment), Shift Superintendents and Control Room Supervisors shall hold a senior reactor operator license. The Control Operators and Assistant Control Operators shall hold a reactor operator license.

[#]The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.