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SUBJECT: Forwards listing of proposed changes to Tech Specs to support 18-month surveillance interval extension.

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VICE PRESIDENT

TELEPHONE
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March 20, 1989

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Technical Specification
18 Month Surveillance Interval Extension
San Onofre Nuclear Generating Station
Units 2 and 3

The Southern California Edison Company (SCE) has embarked upon a program to extend certain Technical Specification 18-Month Surveillance Requirements to a refueling interval to support nominal 24-month fuel cycle operation. The Technical Specification Surveillance Requirements SCE has sought to extend as a result of extended fuel cycle operation are those which could not be performed with the unit at power. Surveillances which meet this criterion are those that would either result in high man-rem exposure, trip the unit, or pose a high potential for tripping the unit. SCE has identified 30 such technical specification changes, and has submitted technical specification changes proposing to amend the 18 month surveillances to a "refueling interval" for all but 6 of these. The enclosure to this letter identifies SCE's submittals in this area.

The approach taken to revise the 18-month surveillances identified in the enclosure to this letter was as follows. Where in the surveillances the words "at least once per 18 months" appeared, SCE proposed the words "at least once per refueling interval" in its submittal. Proposed Change No. NPF-10/15-251 provides an example of this format. The surveillances provided for instrumentation calibrations are slightly different in that the requirements are tabular in form. In these cases, the frequency "R" is specified in the table ("R" is defined as at least once per 18 months). SCE proposed that the "R" be replaced with different notation, and a footnote was provided to define the notation as "at least once per refueling interval." Proposed Change No. NPF-10/15-281 provides an example of this format.

Based on the NRC Staff's review of our submittals to date, the Staff has suggested that SCE define "refueling interval" as 24-months. Therefore, SCE proposes to revise its previous submittals concerning the 18 month surveillance interval extension requests.

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SCE requests the addition of the term "Refueling Interval," to Table 1.2 "Frequency Notation" of Section 1.0 of the Technical Specifications. The term "Refueling Interval" would then be defined as "At least once per 24 months." The "Refueling Interval" frequency notation is not used in any other technical specification other than what is identified by SCE's submittals listed in the enclosure. However, as briefly discussed above, six outstanding technical specification changes have yet to be submitted as part of the 18-month surveillance requirement extension effort. The addition of this frequency notation would apply to these as well as those previously submitted technical specification changes that have been proposed to support 24-month fuel cycle operation. This request should be reviewed and approved prior to, or concurrent with, the issuance of the first 18 month surveillance interval extension license amendment.

Should you have any questions regarding the content of this letter, please do not hesitate to call me.

Respectfully submitted,

By: Kenneth P Baskin
Kenneth P. Baskin
Vice President

Subscribed and sworn to before me this 20th day of March 1989.

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

OFFICIAL SEAL
AGNES CRABTREE
Notary Public-California
LOS ANGELES COUNTY
My Comm. Exp. Sep. 14, 1990

Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

Enclosure

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
TO SUPPORT
18 MONTH SURVEILLANCE INTERVAL EXTENSION

Tech. Spec. Change No.	Tech. Spec. Revised	Description	Submittal Date	TAC No.
PCN-243	3/4.7.8.2.d, 3/4.7.8.3.b 3/4.7.9.2	Sprinkler and Spray Sys. Fire Rated Assemblies	5/6/88	68385/6
PCN-246	3/4.7.6.b,d,i	Snubbers	5/19/88	68389/90
PCN-247	3/4.6.4.2.b.1,2,3	Hydrogen Recombiner	4/26/88	67999/8000
PCN-248	3/4.3.1.4	CEA Iso. Amp. and Optical Isolator	4/26/88	68007/8
PCN-249	3/4.1.3.4.c	CEA Drop Time	4/26/88	67980/1
PCN-250	3/4.3.3.10.c	Loose Parts Detection	4/26/88	68001/2
PCN-251	3/4.3.1.3 3/4.3.2.3	RX Trip ESFAS Response Time	4/26/88	68003/4
PCN-252	3/4.8.1.1.1.b 3/4.8.1.1.2.d	AC Sources	10/24/88	71054/5
PCN-253	3/4.8.2.1.c, 3/4.8.4.2.a	D.C. Sources	12/29/88	71792/3
PCN-254	3/4.8.4.1.a, 3/4.8.4.2.a	Penetration Conductor Overcurrent and MOV Thermal Overload	12/16/88	71582/3
PCN-256	3/4.3.1.2, 3/4/3.2.2	RPS/ESFAS Instr.	11/7/88	71172/3
PCN-257	3/4.6.2.1.b, 3/4.6.2.3.b	Cont. Spray	10/11/88	69838/9
PCN-258	3/4.6.3.2	Cont. Isolation Valves	10/24/88	71056/7
PCN-259	3/4.6.4.3.a, 3/4.6.3.b	Cont. Dome Air Circulators		69840/1
PCN-260	3/4.7.1.2.1.b, 3/4.7.3.b, 3/4.7.4.b, 3/4.7.10.b	Emer. Chill Water System (AFW, CCW, SWC)	1/20/89	71932/3

Tech. Spec. Change No.	Tech. Spec. Revised	Description	Submittal Date	TAC No.
PCN-261	3/4.1.2.2.c, 3/4.5.2.d 3/4.5.2.e	Boron Inject. & ECCS Subsys. Flow Valves	10/24/88	71079/80
PCN-264	3/4.5.2.2.a	Operational Leakage	10/11/88	69842/3
PCN-265	3/4.5.1.e	SI Tanks	10/11/88	71174/5
PCN-266	3/4.3.2.1, Table 4.3-2 (12.a,c,d)	ESFAS Instr. (7856, 7857)	12/30/88	71794/5
PCN-267	3/4.3.3.1, Table 4.3-3 (1a)	Rad. Monitoring	12/19/88	71603/4
PCN-271	3/4.3.4.c	Turbine Overspeed	12/28/88	71796/7
PCN-279	3/4.4.5.1.b	Cont. Sump Inlet Flow	12/19/88	71605/6
PCN-281	3/4.3.3.3.1, Table 4.3-4 (all)	Seismic Instr.	1/16/89	71930/1
PCN-282	3/4.1.3.3	CEA RSPT	12/19/88	71607/8

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