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 AUTH.NAME                    AUTHOR AFFILIATION  
 RAY, H.B.                    Southern California Edison Co. *see Proposed Tech*  
 RECIP.NAME                  RECIPIENT AFFILIATION *Spec. Change*  
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SUBJECT: Forwards Amend Applications 69 & 55 to Licenses NPF-10 & NPF-15, respectively, consisting of PTSC NPF-10/15-275.

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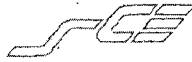
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Southern California Edison Company

P.O. BOX 800

2244 WALNUT GROVE AVENUE  
ROSEMEAD, CALIFORNIA 91770

TELEPHONE  
818-302-2281

HAROLD B. RAY  
VICE PRESIDENT

January 8, 1990

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Amendment Applications Nos. 69 and 55  
San Onofre Nuclear Generating Station  
Units 2 and 3

Reference: 1. SCE to NRC letter, dated May 15, 1989, regarding Proposed  
Change NPF-10-290

San Onofre Units 2 and 3 are presently operating on a nominal 24 month fuel cycle. In order to complete these fuel cycles without an unnecessary and burdensome outage to perform "refueling" interval surveillances prior to the end of each fuel cycle, SCE has been involved in a program to extend "refueling" interval surveillances from 18+25% months to 24+25% months. The refueling interval extension was accomplished for the first 24 month fuel cycle for San Onofre Unit 2 cycle 5 through a combination of Technical Specification changes and one time exemptions. San Onofre Unit 3 is expected to complete its first 24 month fuel cycle and start the SONGS 3 cycle V refueling on April 14, 1990. Technical Specification changes have been previously submitted for all but four of the Technical Specification changes required to allow uninterrupted operation until the presently anticipated refueling date. This letter transmits one of the remaining four requests for Technical Specification changes. Companion letters have been mailed on this date requesting two of the remaining three Technical Specification changes. The fourth, and final Technical Specification change request is forecast to be transmitted to the NRC in approximately six weeks. The refueling interval surveillances associated with these technical specification changes start to come due on April 3rd, 1990. SCE requests approval of this and the associated 3 other changes prior to April 3rd, 1990 in order to avoid an unnecessary shutdown.

The attachments to this letter comprise Amendment Application No. 69 to Facility Operating License NPF-10 and Amendment Application No. 55 to Facility Operating License NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. These Amendment Applications consist of Proposed Technical Specification Change NPF-10/15-275 (PCN-275).

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January 8, 1990

PCN -275 is a request to revise San Onofre Units 2 and 3 Technical Specification 3/4.3.1, "Reactor Protective Instrumentation," to increase the interval for refueling interval surveillance tests which are currently performed every 18 months, to each refueling, nominally 24 months and maximum 30 months. As the result of modifying the surveillance interval, changes are proposed to the

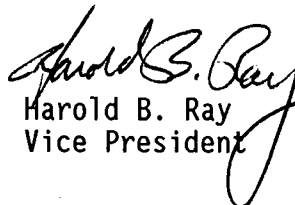
Reactor Protective instrumentation setpoints in Technical Specification 2.2.1, Table 2.2-1; the High Logarithmic Power Level response time in Technical Specification 3/4.3.1, Table 3.3-2; and the Linear Power Level calibration tolerance in Technical Specification 3/4.3.1, Table 4.3-1.

The technical evaluation to justify the surveillance interval extension performed a comprehensive review of all of the Reactor Protective instrumentation. The evaluation consisted of a comparative analysis of all Preventive Maintenance (PM) surveillances, a PM history review for all instruments, a statistical evaluation of instruments impacted by drift and a setpoint analysis. Where necessary to preserve the margin of safety and/or to maintain adequate operating margins, setpoint changes are proposed based on changes to the Safety Analysis and changes to the trip setpoint calculations. This approach augments that which was submitted, by Reference 1, in support of Proposed Change NPF-10-290 (PCN 290) which requested a one-time exemption to the instrumentation calibration surveillance intervals for San Onofre Unit 2. Operating margin to Core Protection Calculator (CPC) generated trips has not been changed.

Based upon our evaluations we have concluded that extending the surveillance interval of Reactor Protective Instrumentation to a nominal 24 months, or maximum 30 months, will not have an adverse affect on Technical Specification operability requirements. The 30 month interval is the maximum 25% extension of the surveillance interval permitted by Technical Specification 4.0.2.

If you have any questions regarding this information, please call me.

Very truly yours,

  
Harold B. Ray  
Vice President

275LET.LCF  
Enclosures

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