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 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362  
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 MEDFORD, M. O. Southern California Edison Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards Proposed Change PCN-242 to Licenses NPF-10 & NPF-15  
 re storage of Unit 1 spent fuel at Unit 2 & Unit 3, for  
 review. Proposed license amend unnecessary since subj  
 documented in FSAR & approved by NRC. Fee paid.

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December 30, 1987

TELEPHONE  
(818) 302-1749

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

Gentlemen:

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

In response to a request from the NRC staff, enclosed for your review and approval is a proposed change to the San Onofre Nuclear Generating Station Units 2 and 3 Facility Operating Licenses. The Proposed Change, PCN-242, makes an editorial change to a clause which has been in the Facility Operating Licenses since they were originally issued. This proposed editorial change provides clarification that the NRC conducted a complete review and approved the storage of Unit 1 spent fuel at Unit 2 and Unit 3 prior to issuing the operating licenses.

It is Southern California Edison's position that this proposed license amendment is not necessary because the intent to store Unit 1 fuel in Units 2 and 3 was documented in the Final Safety Analysis Report and was reviewed and approved by the NRC as documented in the February 1981 NRC Safety Evaluation Report.

In accordance with 10 CFR 170.12 enclosed is the required amendment application fee of \$150. A formal request for PCN-242 will be included in our next formal amendment application.

If you have any questions regarding the enclosed information please call me.

Very truly yours,

*M.O. Medford*

Enclosure

cc: H. Rood, NRR Senior Project Manager, San Onofre Units 2 and 3  
J. B. Martin, Regional Administrator, NRC Region V  
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3  
J. O. Ward, California Department of Health Services

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## DESCRIPTION OF PROPOSED CHANGE NPF-10/15-242 AND SAFETY ANALYSIS

This is a request to revise the Facility Operating License Section 2.B.(6) concerning possession of byproduct and special nuclear material.

### Existing Section

Unit 2: SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproducts and special nuclear materials as may be produced by the operation of the facility.

Unit 3: SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

### Proposed Specifications

Unit 2: SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproducts and special nuclear materials as may be produced by the operation of San Onofre Unit 1 and Unit 2.

Unit 3: SCE, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of San Onofre Unit 1 and Unit 3.

### Description

The proposed change revises Facility Operating License Section 2.B.(6) concerning possession of byproduct and special nuclear material. Section 2.B.(6) may be interpreted to include authorization for Southern California Edison (SCE) to possess such byproducts and special nuclear materials (e.g. spent fuel) at Unit 2 which are produced only at Unit 2. However the intent of the application for an operating license and NRC approval of the operating license application was to include storage of Unit 1 spent fuel at both Unit 2 and Unit 3. The intent to store Unit 1 spent fuel at Unit 2 and Unit 3 is clearly documented many times in the Final Safety Analysis Report Sections 9.1.2 and 9.1.3, was reviewed and approved by the NRC during the operating license process, and the NRC review and approval was documented in the NRC Safety Evaluation Report, Sections 9.1.2 and 9.1.3, dated February, 1981.

### Safety Analysis

The proposed changes discussed above 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?

Response: No

The proposed change only corrects an editorial discrepancy in Facility Operating License Section 2.B.(6). There is no change in the probability or consequences of a potential accident which has been previously evaluated.

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?

Response: No

The proposed change corrects an editorial discrepancy in the Facility Operating License, therefore it does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No

The proposed change corrects an editorial discrepancy and therefore does not affect any margin of safety.

The Commission has provided guidance for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (i) relates to a purely administrative change; for example, a change to achieve consistency in the Technical Specifications, correction of an error, or a change in nomenclature. In this case, the proposed change corrects a possible oversight error to provide clarification that a complete review and approval of the storage of Unit 1 spent fuel at Unit 2 and Unit 3 has been conducted. Because this proposed change corrects an editorial discrepancy, it is similar to Example (i).

#### Safety and Significant Hazards Determination

Based on the above Safety Analysis it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (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.