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ACCESSION NBR: 8404170477 DOC. DATE: 84/04/13 NOTARIZED: NO DOCKET #
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362

AUTH. NAME: MEDFORD, M.O. AUTHOR AFFILIATION: Southern California Edison Co.
 RECIP. NAME: KNIGHTON, G.W. RECIPIENT AFFILIATION: Licensing Branch 3

SUBJECT: Requests approval of proposed Tech Spec Changes NPF-15-33 & NPF-10-4 before 840624 & 0724, respectively, in order to avoid potential for impact on continued full power operation.

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Southern California Edison Company



P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

April 13, 1984

M.O. MEDFORD
MANAGER, NUCLEAR LICENSING

TELEPHONE
(213) 572-1749

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Gentlemen:

Subject: Docket No. 50-361 and 50-362
San Onofre Nuclear Generating Station, Units 2&3

Southern California Edison Company's (SCE) letter dated January 25, 1983 submitted Proposed Change NPF-15-33 to the San Onofre Nuclear Generating Station (SONGS) Unit 3 Technical Specifications. Proposed Change NPF-15-33 requests a reduction of the current departure from nucleate boiling ratio (DNBR) rod bow penalties to values supported by Combustion Engineering Topical Report CENPD-225 and which have already been approved for SONGS Unit 2.

As noted in SCE's letters dated September 23, 1983 and July 14, 1983, the current rod bow penalties are expected to impact continued full power operation when peak assembly burnup reaches 7000 MWD/MTU. It is expected that Unit 3 will reach this burnup by June 24, 1984. SCE understands that this change was noticed in the Federal Register in December and that the required 30 day noticing period expired on January 20, 1984 without receipt of comments. Therefore, SCE requests issuance of Proposed change NPF-15-33 before June 24, 1984 in order to avoid the potential for impact on continued full power operation.

SCE's letter dated January 25, 1984 submitted Proposed Changes NPF-10-4 and NPF-15-4 for the SONGS Units 2 and 3 Technical Specifications. These proposed changes revise Specification 3/4.3.2, Engineered Safety Features Actuation System (ESFAS) Instrumentation, to not require testing of certain ESFAS relays at six month intervals, which necessitates a plant shutdown. The proposed changes will require testing of these relays at each cold shutdown of sufficient duration, unless they have been tested within the previous six months. This is consistent with the current NRC staff position on this issue. Testing of the ESFAS subgroup relays which would necessitate a plant

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Mr. George W. Knighton

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April 13, 1984

shutdown is next required for Unit 2 by July 24, 1984. Accordingly, to avoid this unnecessary shutdown of Unit 2, NRC approval of Proposed Changes NPF-10-4 and NPF-15-4 is requested by July 24, 1984.

If you have any questions regarding these requests, please call me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. D. Murphy".

cc: H. Rood, NRC (to be opened by addressee only)
A. E. Chaffee, NRC Resident Inspector