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 MEDFORD, M. O. Southern California Edison Co.  
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 KNIGHTON, G. W. PWR Project Directorate 7

SUBJECT: Requests approval of 851127 request for Proposed Change full power operation w/NPF-10115-213 to revise Tech Spec 3/4.1.1.3 to accomodate more negative moderator temp coefficient, by 860120, due to outage ending early.

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MANAGER, NUCLEAR LICENSING

December 10, 1985

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Director, Office of Nuclear Reactor Regulation  
Attention: Mr. George W. Knighton, Director  
PWR Project Directorate No. 7  
Division of PWR Licensing - B  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

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

The Southern California Edison Company (SCE) submitted on November 27, 1985 a proposed change, NPF-10/15-213, to revise Technical Specification 3/4.1.1.3, "Moderator Temperature Coefficient", from  $-2.5 \times 10^{-4}$  delta k/k/°F to  $-3.0 \times 10^{-4}$  delta k/k/°F. This submittal was intended to accommodate a continued full power operation with a more negative moderator temperature coefficient (MTC) than the existing Technical Specification limit at the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 towards the end of Cycle 2.

It was requested then that the approval of the proposed change be made by January 31, 1986 on the basis of a previous projection of a startup date on December 20, 1985 for SONGS 2. However, the outage was ended early and the unit was returned to service on December 5, 1985. Consequently, it is necessary to request your approval of the proposed change by January 20, 1986 pursuant to 10 CFR 50.91(6) in order to alleviate any constraint on SONGS 2 power operations.

The exigent situation results from the finding that the projected end-of-cycle MTC value for SONGS 2 Cycle 2 may become more negative than the current Technical Specification limit. This projection is based on a full power MTC measurement at 173 Effective Full Power Days (EFPD's) performed on November 7, 1985 and data from early measurements. This recent measurement was determined in compliance with the existing Surveillance Requirements, 4.1.1.3.1(c), when SONGS 2 reached two-thirds of the expected core life of 265 EFPD's. It is anticipated by extrapolation that the present Technical Specification limit on the MTC will be exceeded at 229 EFPD's or around January 23, 1986. Without any immediate relief in the existing Technical Specification requirement, it is evident that SONGS 2 will be forced to operate at a combination of power and temperature reduction or to shutdown early for refueling. Such derating or early shutdown will not only affect power availability but also perturb SONGS 2 Cycle 3 reload licensing. The

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Mr. G. W. Knighton

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economic impact to SCE's customers and shareholders is significant and the extra burden to be imposed on the Staff pertaining to Cycle 3 licensing applications can be detrimental. It is therefore imperative to request a waiver of the normal public notice because of the existing exigent circumstances.

A timely approval of the proposed change under 10 CFR 50.91(6) will allow SONGS 2 to continue operating at full power beyond January 23, 1985. Your special attention to expedite this new target date for approval is appreciated. Should you have any questions regarding this request, please call me.

Very truly yours,



cc: Harry Rood, NRC Project Manager  
F. R. Huey, USNRC Senior Resident Inspector, Units 1, 2 and 3