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SUBJECT: Application for amends to Licenses NPF-10 & NPF-15, changing
 Tech Specs to revise borated water source requirements to
 support extended fuel cycle operation. Fee paid.

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July 17, 1987

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

Enclosed for your review and approval is a proposed change to the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Technical Specifications. The proposed change, NPF-10/15-235, (PCN-235) revises Technical Specification (TS) 3/4.1.1.1, "Boration Control - Shutdown Margin Tavg>200°F", TS 3/4.1.1.2, "Shutdown Margin - Tavg<200°F", TS 3/4.1.2.7, "Borated Water Source - Shutdown", TS 3/4.1.2.8, "Borated Water Sources - Operating", TS 3/4.5.1, "Safety Injection Tanks", TS 3/4.5.4, "Refueling Water Storage Tank", TS 3/4.6.2.2, "Recirculation Flow pH Control", TS 3/4.9.1, "Refueling Operations - Boron Concentration", TS 3/4.10.1, "Special Test Exceptions - Shutdown Margin", and associated Bases. These specifications define as limiting conditions for operation (LCO), volumes and concentrations of borated water to be maintained in the refueling water storage tank (RWST), the boric acid makeup (BAMU) tanks and safety injection tanks (SIT), the minimum boron concentration to be maintained in the refueling mode as well as the amount of trisodium phosphate (TSP) to be stored inside containment. These specifications also require the periodic performance of specified surveillance tests and inspections to verify that the LCO's are met, and identify compensatory actions to be taken in the event that LCO's are not met.

The proposed change revises borated water source requirements to support extended fuel cycle operation. Extended fuel cycles have necessitated increases in borated water source concentrations and the quantity of TSP to be stored in containment.

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Although refueling operations can be carried out within the current borated water source concentration limits, the concentration used to maintain $K_{eff} \leq 0.95$ during refueling operations reduces margin to the current upper limit on boric acid concentration. Accordingly, the Southern California Edison Company (SCE) requests prompt review and approval of the proposed change in order to avoid the potential for conflict with current technical specification limits in the upcoming Unit 2 refueling outage. Approval is requested by September 18, 1987.

In accordance with 10 CFR 170.12, enclosed is the required amendment application fee of \$150.00. A formal request for this change will be included in our next formal amendment application.

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



M. O. Medford

PWS:atl:0357H

Enclosure

cc: Joseph O. Ward, California Department of Health Services
J. B. Martin, Regional Administrator, NRC Region V
Harry Rood, NRC Project Manager
F. R. Huey, USNRC Senior Resident Inspector