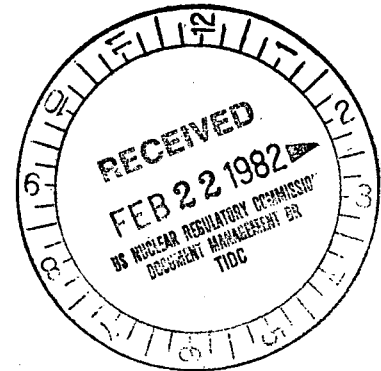


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Docket No. 50-206

Southern California Edison Company
ATTN: Mr. Robert Dietch
Vice President
P.O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770



Gentlemen:

We have received copies of the following two applications by your Company which were filed with the Office of Nuclear Reactor Regulation (ONRR) for review of Technical Specification changes for San Onofre Unit No. 1:

1. Amendment No. 100/Proposed Change No. 110 dated December 18, 1981, for station reorganization changes. A Class II fee of \$1,200 was remitted with this application, and
2. Amendment No. 102/Proposed Change No. 105 dated December 24, 1981, for snubber changes in accordance with a USNRC letter dated March 23, 1981. Fees pursuant to 10 CFR 170.22 were not remitted with this application because your Company determined that it is exempt from fees since it was requested by the USNRC to clarify the Technical Specifications (TS) by conforming them to the Standard Technical Specifications (STS), and that the amendment is for the convenience of the USNRC.

Based on information provided by the ONRR staff as a result of a preliminary review of your applications, the following fee determinations have been made:

1. Item 1 above is considered to be more than administrative or pro forma in nature because it will involve review of new positions and additional managerial responsibilities that are considered to have safety significance. Therefore, a Class III fee is applicable in lieu of the paid Class II fee, and an additional sum of \$2,800 is required for it, and
2. Item 2 is not exempt from fees and will involve consideration of a single safety issue. As such, a Class III fee of \$4,000 is required. When applications for license amendments or other approvals are requested by the USNRC for the purpose of enhancing the safe operation of a nuclear facility, to correct a problem or potential problem relating to plant operation and/or warrant specific inclusion in facility TS, they are not exempt from the fee require-
22. On this basis, licensees are being

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requested to pay fees for applications submitted in response to the USNRC requests for amendments relating to snubber surveillance. For your information, the exemption provision referred to in the background statement of the revised rule published on February 21, 1978, on conversion to STS covers total one-time conversions of old form TS to STS. It does not apply to the piecemeal conversion where the specifications need to be upgraded because of specific safety concerns.

If the ONRR staff's final reviews of the above applications reveal that these fees are not correct, you will be notified and any necessary adjustments will be made. In conclusion, it is requested that your Company remit a total of \$6,800 to our office to complete payment for the subject applications.

Sincerely,

Original Signed by
Wm. O. Miller

William O. Miller, Chief
License Fee Management Branch
Office of Administration

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