

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON)
COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY)
for a Class 104(b) License to Acquire,) DOCKET NO. 50-206
Possess, and Use a Utilization Facility as)
Part of Unit No. 1 of the San Onofre Nuclear) Amendment No. 104
Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS
& ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit
Amendment No. 104.

This amendment consists of Proposed Change No. 109 to
the Technical Specifications incorporated in Provisional
Operating License No. DPR-13 as Appendices A and B.

Proposed Change No. 109 is a request to revise the
Technical Specifications to provide reasonable assurance that
the trisodium phosphate additive in the San Onofre Unit 1
containment sump has not degraded sufficiently to prevent the
operation of its pH buffer function. This revision will modify
the surveillance test acceptance criteria to allow the test of
a minimum operability for the system as opposed to a test of
the original design basis.

In the event of conflict, the information in this
Amendment No. 104 supersedes the information previously
submitted.

Accordingly, it is concluded that (1) the proposed change does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant hazards considerations not described or implicit in the Final Safety Analysis, and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change.

Pursuant to 10 CFR 170.22, Proposed Change No. 109, submitted as Amendment No. 104, is determined to be a Class III change. The basis for this determination is that the proposed change involves a single safety issue with regard to the surveillance test acceptance criteria for the containment sump post-accident pH control system.

Accordingly, the fee of \$4,000.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this 5th day of April, 1982

Respectfully submitted,

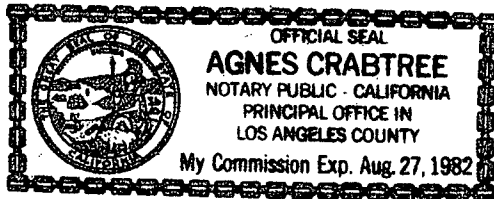
SOUTHERN CALIFORNIA EDISON COMPANY

By Robert Dietch
Robert Dietch
Vice President

Subscribed and sworn to before me this
5th day of April, 1982.

Agnes Crabtree
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Aug 27, 1982



Charles R. Kocher
James A. Beoletto
Attorneys for Southern
California Edison Company

By James A. Beoletto

Subscribed on this 1st day of April 1982.

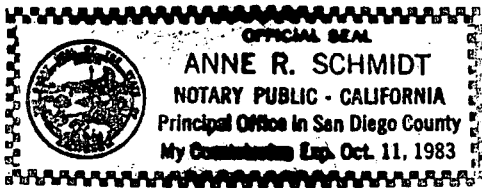
Respectfully submitted,
SAN DIEGO GAS & ELECTRIC COMPANY

By *G. D. Cotton*
G. D. Cotton
Vice President

Subscribed and sworn to before me this
1st day of April 1982.

Anne R. Schmidt
Notary Public in and for the County of
San Diego, State of California

My Commission Expires: 10/11/83



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By *David R. Pigott*

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN)
CALIFORNIA EDISON COMPANY)
and SAN DIEGO GAS & ELECTRIC)
COMPANY (San Onofre Nuclear)
Generating Station Unit No. 1)

Docket No. 50-206

CERTIFICATE OF SERVICE

I hereby certify that a copy of Amendment No. 104 was served on the following by deposit in the United States Mail, postage prepaid, on the 6th day of April, 1982.

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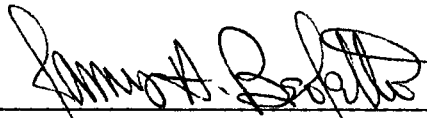
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James A. Beoletto
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DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS
PROPOSED CHANGE NO. 109 TO THE TECHNICAL SPECIFICATIONS
PROVISIONAL OPERATING LICENSE DPR-13

This is a request to revise Appendix A, Technical Specification 4.2.1, Safety Injection and Containment Spray System Periodic Testing.

REASON FOR PROPOSED CHANGE

Technical Specification 4.2.1.I.A(4) is the test acceptance criteria for performance verification of the trisodium additive in the containment. The purpose of this proposed change is to modify the test acceptance criteria to be consistent with anticipated post-LOCA conditions in containment.

EXISTING SPECIFICATION

Technical Specification 4.2.1.I.A(4) currently reads as follows:

- (4) The test shall be considered satisfactory if the racks have maintained integrity, the racks are visually observed to be full, and the trisodium phosphate dissolves to the extent that a minimum pH of 7.0 is reached within four hours of the start of the test.

PROPOSED SPECIFICATION

Technical Specification 4.2.1.I.A(4) would be revised to read as follows:

- (4) The test shall be considered satisfactory if the racks have maintained their integrity, the racks are visually observed to be full, and the trisodium phosphate dissolves to the extent that a pH of 6.9 ± 0.2 is reached within four hours of the start of the test.

BASIS

Proposed Change No. 109 revises the San Onofre Unit 1 Technical Specifications to be consistent with anticipated post-LOCA containment conditions and is more conservative than the Standard Technical Specifications for Westinghouse Pressurized Water Reactors (STS) Revision 3 issued September, 1980. The postulated post-LOCA pH of the containment spray will not increase the chloride ion induced stress corrosion cracking of stainless steel a significant amount to be a safety concern.

SAFETY ANALYSIS

This revision to the San Onofre Nuclear Generating Station, Unit 1 Technical Specifications revises the test acceptance criteria delineated in Section 4.2.1.I.A(A) from a pH minimum value of 7.0 to a range of 6.9 ± 0.2 . This pH range is consistent with anticipated post-LOCA containment sump chemistry. It does not result in a significant change in calculated chloride ion induced stress corrosion cracking of stainless steel, in the containment.

As a result, it is reasoned that (1) the proposed change does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant safety considerations not described or previously evaluated in the Final Safety Analysis, and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change.