

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, )  
Possess, and Use a Utilization Facility as )  
Part of Unit No. 1 of the San Onofre Nuclear )  
Generating Station )

DOCKET NO. 50-206

Amendment No. 106

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC  
COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment No. 106.

This amendment consists of Proposed Change No. 114 to the Technical  
Specifications incorporated in Provisional Operating License No. DPR-13 as  
Appendices A and B.

Proposed Change No. 114 is a request to modify Technical  
Specification 4.2.3 to allow a delay in the SIS Hydraulic Valve Testing  
interval during periods when the plant is in Mode 5 or 6 at the time the test  
is required. In these cases, the test will be performed in either Mode 3 or 4  
prior to the next entry into Mode 2 operation.

In the event of conflict, the information in this Amendment No. 106  
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.

This Proposed Change No. 114, submitted as Amendment No. 106, is a clarification of Amendment 57 to the license DPR-13 issued by the Nuclear Regulatory Commission, November 5, 1981. That Amendment was in response to our Proposed Amendment 99 which included a fee of \$4,000 per 10 CFR 170.22. Since this change is minor and only provides a clarification of the Amendment, it should not require significant review by the Commission and no fee beyond that submitted with Amendment 99 is provided.

Subscribed on this 25<sup>th</sup> day of June 1982

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

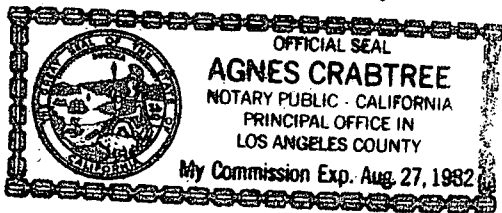
By *[Signature]*

Subscribed and sworn to before me this

25<sup>th</sup> day of June, 1982.

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

My Commission Expires: Aug. 27, 1982



Subscribed on this 23rd day of June, 1982.

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

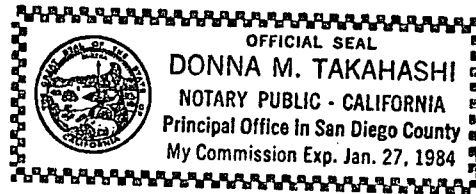
By

J. D. Cotton

Subscribed and sworn to before me this

23rd day of June, 1982.

Donna M. Takahashi  
Notary Public in and for the County of  
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My Commission Expires: 1-27-84

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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. 106 was served on the following by deposit in the United States Mail, postage prepaid, on the 25th day of June, 1982.

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DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS  
PROPOSED CHANGE NO. 114 TO THE TECHNICAL SPECIFICATIONS  
PROVISIONAL OPERATING LICENSE DPR-13

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This is a request to revise Appendix A, Technical Specification 4.2.3, "Safety Injection System Hydraulic Valve Testing (Surveillance Requirement)."

REASON FOR PROPOSED CHANGE

Technical Specification 4.2.3.1 requires that at least once every 92 days the unit be placed in mode 3 or 4 and a Hot SIS functional test be performed. However, during periods of long shutdowns, placing the plant in mode 3 or 4 for the sole purpose of performing this test cannot be justified. A modification in the required surveillance interval will therefore allow for the requisite testing to be performed during subsequent startup operations.

EXISTING SPECIFICATION

Technical Specification 4.2.3.1 currently reads (in part) as follows:

1. At least once every 92 days, the unit shall be placed in mode 3 or 4 and a Hot SIS functional test (with the MOV-850A, B and C valves locked closed) shall be performed....

PROPOSED SPECIFICATION

Technical Specification 4.2.3.1 would be revised to read as follows:

1. At least once every 92 days, (except when the interval lapses while in mode 5 or 6, in which case the test may be delayed until a mode 3 or 4 operation prior to the next entry into mode 2) the unit shall be placed in mode 3 or 4 and a Hot SIS functional test (with the MOV-850 A, B and C valves locked closed) shall be performed....

BASIS

This change would revise the San Onofre Nuclear Generating Station, Unit 1 Technical Specifications to allow for surveillance testing of the SIS Hydraulic Valves at an interval greater than 92 days when the test interval would lapse during mode 5 or 6 operation.

During shutdown intervals lapsing the 92 day interval, it cannot be expected to place the unit in Mode 3 or 4 for the purpose of running this test. Sufficient data to confirm the valves reliability can be derived from normal testing without requiring extenuating circumstances for testing during shutdown.

This modified Technical Specification explicitly states the actions that are now assumed for the above scenarios.

#### SAFETY ANALYSIS

This change to the San Onofre Nuclear Generating Station, Unit 1 Technical Specifications would explicitly permit the required SIS Hot functional test to be performed during plant startup operations when it is not practical to do so during periods of mode 5 or 6 operation.

The purpose of these tests is to confirm the reliability of the Hydraulic Valves. Significant degradation of the valves is not expected to occur over the lengths of time the unit may be expected to be down for backfit and/or maintenance. Therefore, performance of this test during startup operation would meet the requirements of confirming valve reliability over time. It should be noted that as part of Technical Specification 4.2.3 a long term surveillance test program must be developed prior to the next refueling outage. This program will probably rely on information gathered from the current test program.

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.

GEH:4437