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. 108
Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment No. 108.

This amendment consists of Proposed Change No. 113 to the Technical Specifications incorporated in Provisional Operating License No. DPR-13 as Appendices A and B. Proposed Change No. 113 is a request to modify Table 4.1.2, Minimum Equipment Check and Sampling Frequency, of Appendix A. This modification consists of 1) a few editorial corrections, 2) use of additional words in the sampling requirements to clarify how those requirements are to be met in the various reactor operational modes. Without this modification, Table 4.1.2 is subject to misinterpretation and the imposition of excessive sampling requirements.

In the event of conflict, the information in this Amendment No. 108 supersedes the information previously submitted.

Based on the safety analysis provided in the Description of Proposed Change and Safety Analysis, it is concluded that (1) the proposed changes do not involve an unreviewed safety question as defined in 10 CFR 50.59, nor do they present significant hazards considerations not described or implicit 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.

Pursuant to 10 CFR 170.22, Proposed Change No. 113, submitted as Amendment No. 108, is determined to be a Class II change. The basis for this determination is that the change is administrative in nature, having no safety or environmental significance.

Accordingly, the fee of \$1,200.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this 10th day of lugust, 1982

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

Ву

Robert Dietch

Vice President

Subscribed and sworn to before me this

10th day of L

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

My Commission Expires: (dug. 27, 1982

OFFICIAL SEAL

AGNES CRABTREE

NOTARY PUBLIC - CALIFORNIA

PRINCIPAL OFFICE IN

LOS ANGELES COUNTY

My Commission Exp. Aug. 27, 1982

Subscribed on this 28th day of July 1982

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

Subscribed and sworn to before me this

28 day of July 1982.

June R. Schmidt Notary Public in and for the County of

San Diego, State of California

ANNE R. SCHMIDT NOTARY PUBLIC - CALIFORNIA
Principal Office in San Diego County
My Commission Exp. Oct. 11, 1983 NOTARY PUBLIC - CALIFORNIA

My Commission Expires: Oct. 11, 1983

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

Ву

mes A. Beoletto

David R. Pigott Samuel B. Casey Orrick, Herrington & Sutcliffe Attorneys for San Diego Gas & Electric Company

Ву

David R. Pigott

DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS PROPOSED CHANGE NO. 113 TO THE TECHNICAL SPECIFICATIONS PROVISIONAL OPERATING LICENSE DPR-13

This is a request for revision of Appendix A, Technical Specifications, and to amend the license thereby.

Reasons for Proposed Change

The following changes apply to Table 4.1.2, "Minimum Equipment Check and Sampling Frequency."

- 1. Items 1a and 1b identify the reactor coolant and the secondary coolant sampling frequencies to meet the Safety Standards and Limiting Conditions for Operation. Items 1a and 1b are revised in order to delete certain unnecessary sampling checks. Bases for the deletions are specified below under "Safety Analysis."
- 2. A new footnote 1 is added to define E.
- 3. The numbering on footnotes 2 and 3 was in reverse order. This is corrected.

Existing Specifications

The existing specifications are as constituted in Appendix A, Technical Specifications, Table 4.1.2.

Proposed Specifications

The proposed specifications are as provided in the Enclosure.

Safety Analysis

The proposed changes are either corrections, or are intended to improve operational safety surveillance by deleting certain unnecessary coolant sampling requirements. The proposed changes do not affect the plant operational margins. Bases for the proposed sampling changes are as follows (numbers below refer to item numbers on Table 4.1.2):

- 1al. Instead of 3 times/week, once per 72 hours (3 days), is a minor change to a routine requirement that does not impact plant safety. It ensures uniform practice with Unit 2 of the San Onofre Nuclear Generating Station.
- 1a2. During operational modes other than Mode 1, a significant increase in iodine concentration will show up in the gross activity determination and can be monitored as part of that determination. There is no need to continue a dose equivalent analysis of iodine.

- 1a3. During operational modes other than Mode 1, the rate of production of fission products is insignificant. Therefore, this analysis is not required in the other modes.
- 1bl. During Modes 5 and 6, the reactor coolant and the secondary coolant are both unpressurized. Therefore, a potential for radioactive release to the secondary side or to the atmosphere does not exist. Therefore, in Modes 5 and 6, secondary side sampling may be discontinued.
- 1b2a, These analyses depend on the results of the secondary coolant gross 1b2b activity determination, which is not required during Modes 5 and 6.

Based upon the above analysis, it is concluded that (1) the proposed change does not involve an unreviewed safety question as defined in 10CFR50.59, nor does it present significant hazards considerations not described or implicit 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.