

Southern California Edison Company



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M.O. MEDFORD
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January 30, 1984

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Office of Administration
Attention: Reba M. Diggs
Facilities Program Coordinator
License Fee Management Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Amendment Application No. 70
San Onofre Nuclear Generating Station
Unit 1

With the subject Amendment application, dated August 11, 1982, Southern California Edison Company submitted a fee of \$1,200, as required by 10 CFR 170.22. Your letter dated December 16, 1983, requested an additional fee of \$2,800, based on a determination that the application constituted a Class III change in that the NRR review involved consideration of a single safety issue. However, for the reasons stated below, we still regard Amendment No. 70 as a Class II change:

1. All editorial changes requested in the amendment application are purely administrative changes.
2. The exclusion of Tritium from the definition of \bar{E} should be treated as an administrative change. Since Tritium emits low energy betas (0.0186 MeV) and no gammas, it does not contribute significantly to the two hour radiological dose. Since Tritium from the above definition is also a long lived radionuclide and copious amounts of it are generated in a pressurized water reactor, including San Onofre Unit 1, it is readily apparent that exclusion of Tritium is in the direction of increased conservatism. Therefore, this change has no safety significance.
3. The addition of operational modes to Table 4.1.2 is consistent with the Westinghouse Standard Technical Specifications. It ensures that plant operators correctly understand the meaning and applicability of the surveillance requirements. It is considered to be a clarification of the existing surveillance requirements rather than a new change.

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4. The change in sampling frequency from "3 times/week" to "at least once per 72 hours" is consistent with the Westinghouse Standard Technical Specifications as well as the San Onofre Units 2 and 3 Technical Specifications. This change facilitates operation of all three units at San Onofre on a uniform basis, and is considered a minor administrative change with no safety implications.

Based on the above, we feel that no additional fee is warranted and we respectfully request your reconsideration of this matter.

If you have any questions, please contact me.

Very truly yours,

M. D. Medford