

MAY 17 1984

Docket No. 50-206

Southern California Edison Company
ATTN: Mr. M. O. Medford
Manager, Nuclear Licensing
Post Office Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Gentlemen:

Your letters dated January 30, 1984, and April 12, 1984, provided your reasons for your position that Class II fees are appropriate rather than our requested Class III fees for the following two applications for the San Onofre Nuclear Generating Station Unit No. 1:

1. August 11, 1982, on the exclusion of tritium from the definition of E and other changes, and
2. August 10, 1983, on pressurizer pressure-low trip setpoints and revisions to Section 5 of the Appendix A Technical Specifications.

The staff of the Division of Licensing (DL) have reviewed the information in each of the above cases. Based on their fee reassessment, it is still their position that Class III fees are appropriate for each of the above applications because the reviews of some of the Technical Specification changes involved review of technical and/or safety areas. When reviews involve technical or safety areas in order to conclude or agree that they do not decrease safety, they are not considered administrative or pro forma in nature. While the DL staff agree that some portions of the applications were administrative in nature, they do not agree that each application was entirely administrative. For example, they agree that the addition of the operational modes to Table 4.1.2 and other minor related changes for item 1 were administrative in nature, but they do not agree that the tritium exclusion was administrative or pro forma. Although this exclusion is more conservative because it results in a lower allowable limit for specific activity, the review of the reactor coolant activity limits had safety significance and had to be performed to reach the "more conservative" conclusion.

In conclusion, a sum of \$5,600 is required to complete the Class III requirements for the approved applications identified in items 1 and 2 above. In addition to the \$5,600, we have not received the \$4,000 requested November 15, 1983 and March 13, 1984, for your September 9, 1983 application on containment

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purging and venting. Therefore, a total of \$9,600 is past due and should be remitted to us.

Sincerely,

Original Signed by
Wm. O. Miller

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

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