



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

TRSR

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 105 TO FACILITY OPERATING LICENSE NO. DPR-13

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION UNIT NO. 1

DOCKET NO 50-206

1.0 INTRODUCTION

By letter dated August 27, 1987, Southern California Edison Company (SCE or the licensee) requested amendments to the Technical Specifications appended to Facility Operating License No. DPR-13 for the San Onofre Nuclear Generating Station Unit No. 1. The proposed amendments would revise the San Onofre Nuclear Generating Station Unit 1 Technical Specifications to be consistent with recent SCE organizational changes and recent 10 CFR Part 50 NRC correspondence requirements, resolve conflicts in the technical specification reporting requirements and revise Audit requirements.

2.0 EVALUATION

- A. The revised Section 6.2.2 deletes the Manager of Nuclear Generation Services and Deputy Station Manager approval for overtime deviation due to organizational changes. The revised Section 6.8.2 deletes the Manager of Nuclear Generation and Deputy Station Manager approval for programs and procedures, due to organizational changes. These changes are acceptable.
- B. The change to Technical Specification Sections 3.5.8, 3.5.9, 3.18.3 and 3.19 reflects the deletion of reference to a portion of Section 6.0 that was deleted previously. This does not represent any significant change to the Technical Specification and, therefore, is acceptable.
- C. The change to Technical Specification Sections 3.15.2, 3.15.3, 3.16.2, 3.16.3, 3.16.4, 3.17, 3.18.1 and 3.18.2 reflects the revision to the Special Reporting requirements and resolves the inconsistency with 10 CFR Part 50 requirements. In some cases, a Licensee Event Report (LER) is directed to be submitted by the technical specifications; however, the references are not appropriate since 10 CFR Part 50 contains criteria for submitting LERs. In addition, the Technical Specifications, in some instances, direct that the LER be replaced by a Special Report. The 10 CFR Part 50 requirements must be complied

8808240083 880803
PDR ADOCK 05000206
P PNU

with and it is not appropriate that exceptions be taken or they be superseded by technical specifications. This does not represent any significant change to the Technical Specifications and therefore is acceptable.

- D. The change to Technical Specifications Sections 4.2.3 and, 4.16.E reflects the revision that replaces a reference to Section 6.6 with a reference to Section 6.9.2 and provides for consistency in the technical specification reference to Section 6.9.2 Special Report requirements. This does not represent any significant change to the Technical Specification and therefore is acceptable.
- E. The change to Technical Specification Section 4.14F reflects the revision to replace a reference to subsection 6.10.2.k which has been deleted by a previous amendment with a reference to Section 6.10.2. This does not represent any significant change to the Technical Specification and therefore is acceptable.
- F. The change to Technical Specification Section 4.19 revises section 4.19b reference to Section 6.12 to Section 6.13. This numbering change resolves a conflict introduced by Amendment No. 91. In addition, a minor format change for consistency with the standard Technical Specification format is also reflected. These changes do not represent any significant change to the Technical Specification and, therefore, are acceptable.
- G. The change to Technical Specification Section 6.5.3.5 revises subsections 6.5.3.5.a, c and d by deleting the word "all". This change is not intended to limit the scope of audits; it is intended, however, to allow audit personnel to perform audit on a schedule and to a level of detail required by current performance, commensurate with past experience and consistent with practices in other areas. All provisions contained within the Technical Specifications and applicable license conditions are still subject to audits, however; the areas to be audited will be determined by the Nuclear Safety Group. This does not represent any significant change to the Technical Specification and therefore, is acceptable.
- H. The change to Technical Specification Sections 6.9.1.10, 6.9.2 and 6.16 reflect the revision of reporting requirements to make them consistent with 10 CFR 50.4 revisions. The reference to Distribution of Reports is not appropriate in the Technical Specification since 10 CFR Part 50 contains the criteria including distribution, number of copies, etc. for submitting NRC required reports. This does not represent any significant change to the Technical Specifications and therefore is acceptable.

In summary, the above changes are administrative in nature and are primarily necessary to resolve inconsistencies in the Technical Specifications. The revision to the audit requirements section is not expected to reduce the audit effectiveness since the result is that problem areas will receive additional audit attention.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Charles M. Trammell

Dated: August 3, 1988