

Southern California Edison Company



P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

J. H. DRAKE
VICE PRESIDENT

TELEPHONE
213-572-2258

May 7, 1979

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206, Provisional Operating
License No. DPR-13
Amendment No. 79
San Onofre Nuclear Generating Station
Unit 1

Enclosed are three executed and thirty-seven conformed copies of Amendment No. 79 in Docket No. 50-206. Amendment No. 79 consists of Proposed Change No. 78 to the Technical Specifications incorporated into the above-numbered license as Appendices A and B.

Proposed Change No. 78 is a request to delete Environmental Technical Specification 3.1.2a(1)C.2, "Settling Plates", from the Appendix B Technical Specifications. As described in Specification 3.1.2a(1)C.2, the data from the settling plates is designed to provide additional benthic data during periods of high turbidity when visual assessments required by Environmental Technical Specification 3.1.2a(1)C.1, "Diving Surveys", are difficult to make.

The settling plate study has been implemented since 1975 and, during the past three years, little useful information has been gained due to uncontrollable intermittent damage to the equipment. Despite the use of a backup system, repeated damage and loss of sampling stations have prevented the acquisition of benthic data from the settling plate study. However, experience has shown the benthic diving program to be adequate in assessing the natural cobble/sand benthos and the settling plate study to be a nonessential element of the benthic studies. Based upon this experience, the preoperational monitoring program for San Onofre Units 2 and 3, approved on July 6, 1978, had the preoperational settling plate study deleted.

In telephone discussions with the NRC staff, it was agreed that deletion of the "Settling Plate Study" from the San Onofre Unit 1 program was acceptable. First notification of the proposed deletion was in a 30-day report to the NRC dated October 18, 1978. This report discussed the incident of settling plate damage and loss discovered in September, 1978. The report stated that a formal request to delete the "Settling Plate Study" would be forwarded to the NRC in the near future.

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\$4,000.00

May 7, 1979



Based on our telephone discussions with the NRC staff and our finding that deletion of the "Settling Plate Study" does not result in a condition which significantly alters the environment, the study was discontinued in October, 1978. This action was taken in anticipation of formal NRC approval, and to avoid the unnecessary replacement of equipment. Since deletion of the "Settling Plate Study" has not been formally approved by the NRC, failure to continue the study has resulted in noncompliance with the Environmental Technical Specifications.

Accordingly, in order to eliminate similar noncompliances, all studies, except the "Settling Plate Study" required by the Environmental Technical Specifications will be performed pending formal NRC approval to discontinue or change the studies. It is respectfully requested that your review be completed and appropriate action taken concerning Proposed Change No. 78 in a timely manner.

Proposed Change No. 78 is determined to be a Class III license amendment request. Accordingly, also enclosed is Southern California Edison Company's Check No. T009903, dated April 17, 1979 in the amount of \$4,000 as required by 10 CFR 170.22.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. A. [unclear]', is written over the typed phrase 'Very truly yours,'. The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Enclosures

cc: R. H. Engleken (Director, OIE, Region V)