



**Southern California Edison Company**

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June 18, 1991

HAROLD B. RAY  
SENIOR VICE PRESIDENT

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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Subject: **Docket No. 50-206**  
**Amendment Application No. 196**  
**San Onofre Nuclear Generating Station**  
**Unit 1**

- References:
1. Letter, R. M. Rosenblum, SCE to NRC, "Underestimation of Refill Volume Assumed in Large Break LOCA Analysis," March 29, 1991
  2. Letter, R. M. Rosenblum, SCE to NRC, "Evaluation of Volume Differences in Accident Analyses," May 17, 1991

Enclosed is Amendment Application No. 196 to the Provisional Operating License DPR-13 for San Onofre Nuclear Generating Station, Unit 1. Amendment Application No. 196 consists of Proposed Change No. 245.

Proposed Change No. 245 is a request to revise Appendix A, Technical Specifications Section 3.5.2, "Control Rod Insertion Limits," and Section 3.11, "Continuous Power Distribution Monitoring." The proposed change will impose more restrictive limits on core axial offset than those specified in the current Technical Specifications. This restriction will reduce specific power and the Heat Flux Hot Channel Factor.

The proposed change is necessary to reflect the addition of analytical margin to compensate for the underestimated reactor refill volume in the large break LOCA (LBLOCA) analysis of record and for other identified differences between volume used in design basis accident analyses and that calculated in the recently completed NOTRUMP analyses. The effects of the underestimated refill volume were discussed in Reference 1. That letter also demonstrated that administrative controls to restrict the core axial offset provided sufficient margin to offset the effects of the underestimated refill volume, and to allow SONGS 1 full power operation. The proposed change, once approved, will supplant the existing administrative controls to restrict the core axial offset.

The effects of the additional differences between RCS volume used in design basis accident analyses and that calculated in NOTRUMP were discussed in Reference 2. That letter also demonstrated that the existing administrative

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controls to restrict the core axial offset and operation with a reduced RCS average coolant temperature provided sufficient margin to compensate for all of the identified volume differences and assures that SONGS 1 continues to be operated within its design basis. This amendment application requests changes to existing limits for axial offset. Operation with a reduced RCS average coolant temperature (Tavg) is currently implemented by administrative controls. The limiting condition for operation on Tavg will be added to the SONGS 1 Technical Specifications as part of the reanalysis of Chapter 15 events, and will be based on current methods and practices.

If you have any comments or questions regarding this amendment application, please call me.

Very truly yours,

Enclosure

cc: George Kalman, NRC Senior Project Manager, San Onofre Unit 1  
J. O. Bradfute, NRC Project Manager, San Onofre Unit 1  
J. B. Martin, Regional Administrator, NRC Region V  
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3