



Southern California Edison Company

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

H. E. MORGAN
VICE PRESIDENT AND SITE MANAGER
SAN ONOFRE

TELEPHONE
714-368-9470

September 9, 1991

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

Gentlemen:

Subject: **Docket No. 50-206**
Amendment Application No. 188, Supplement 2
San Onofre Nuclear Generating Station, Unit 1

- References: 1) Amendment Application No. 188, dated August 31, 1990, and Supplement 1, dated November 1, 1990.
- 2) Request for Temporary Waiver of Compliance, R.W. Krieger (SCE), to NRC, dated August 26, 1991.

Enclosed is Supplement 2 to Amendment Application No. 188 which revises our previous submittals (Reference 1). This supplement reflects modifications made during the Cycle 11 refueling outage, adds new surveillance test requirements, and generally revises the format and content of the affected Technical Specification sections in accordance with recent discussions with the NRC.

The original submittal requested to revise Section 3.3, "Safety Injection and Containment Spray Systems," Section 3.5.5, "Containment Isolation Instrumentation," and Section 4.2, "Safety Injection and Containment Spray System," of the Appendix A, Technical Specifications for San Onofre Nuclear Generating Station (SONGS), Unit 1. As a result of discussions with the NRC, we reviewed the surveillance test requirements for the Emergency Core Cooling System, and are proposing to add new test requirements to Section 4.2, and also to revise Table 4.1.2, "Minimum Equipment Check and Sampling," and Section 4.4 "Emergency Power System Periodic Testing."

This new revision reduces the level of detail contained in Section 3.3 to make the specifications less complicated. It also reformats the section to reflect equipment train alignment and to include system flow paths requirements in accordance with the Standard Technical Specifications.

110036

9109110225 910909
PDR ADDCK 05000206
P PDR

A001
11

Document Desk



-2-

Due to the lack of standard action statements in the existing Technical Specification Section 3.3, we recently requested a Temporary Waiver of Compliance to perform routine surveillance of the Volume Control Tank level instrumentation (Reference 2). The enclosed amendment application eliminates the need for the waiver by providing a 72-hour action statement applicable to these and other redundant components. We have expedited our submittal at the request of the NRC to accelerate the review process.

If you have any questions or desire further information, please contact me.

Very truly yours,

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