



**Southern California Edison Company**

23 PARKER STREET  
IRVINE, CALIFORNIA 92718

HAROLD B. RAY  
SENIOR VICE PRESIDENT

TELEPHONE  
714-458-4400

September 17, 1991

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

Gentlemen:

Subject: **Docket No. 50-206**  
**Amendment Application No. 198**  
**San Onofre Nuclear Generating Station**  
**Unit 1**

Reference: Letter, F. R. Nandy, SCE to NRC, "Post Accident pH in Containment Sump," February 27, 1991

Enclosed is Amendment Application No. 198 to the Provisional Operating License DPR-13 for San Onofre Nuclear Generating Station, Unit 1. Amendment Application No. 198 consists of Proposed Change No. 244.

Proposed Change No. 244 is a request to revise Appendix A, Technical Specifications Section 3.2, "Chemical and Volume Control System"; Section 3.3.1, "Operating Status" for Safety Injection and Containment Spray Systems; Section 3.3.3, "Minimum Boron Concentration in the Refueling Water Storage Tank (RWST) and Safety Injection (SI) Lines and Minimum RWST Water Volume"; and Section 4.2.1, "Safety Injection and Containment Spray System Periodic Testing." A new Technical Specification Section 3.3.6, "Trisodium Phosphate (TSP) in the Containment Racks" is to be created.

The proposed change reflects an increase in the amount of trisodium phosphate (TSP) stored in the containment racks and incorporates into the Technical Specifications new limits for total boron inventory in the Reactor Coolant System, the RWST and the Boric Acid Storage Tank (BAST). The proposed change is necessary due to changes in our calculations which now include the BAST, in addition to the RWST, as a potential source of borated water in the containment following design basis accidents. The BAST was not included in previous calculations that established Technical Specification limits for TSP and boron concentration in RWST and BAST.

Administrative controls have been implemented at SONGS 1 to ensure that the post-accident containment water pH is maintained within the limits required by the Technical Specifications. These controls are discussed in detail in the above-referenced letter. The proposed change, once approved, will supplant the administrative controls.

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

Very truly yours,

A handwritten signature in cursive script, which appears to read "Harold B. Perry".

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