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September 23, 1991

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

Gentlemen:

Subject: **Docket No. 50-206**  
**Radiological Effluent Technical Specifications (GL 89-01)**  
**NRC TAC Number 75527**  
**San Onofre Nuclear Generating Station**  
**Unit 1**

Reference: Letter, Same subject, J. E. Tatum (NRC) to Mr. Harold B. Ray (SCE)  
dated August 17, 1990.

The purpose of this letter is to provide additional information in support of Southern California Edison's (SCE) Amendment Application No. 175 for San Onofre Nuclear Generating Station, Unit 1. On January 31, 1989, the NRC issued Generic Letter 89-01, "Implementation of Programmatic Controls for the Radiological Effluent Technical Specifications." This Generic Letter allowed Licensees to improve the Technical Specifications by implementation of programmatic controls for the Radiological Effluent Technical Specifications and the Radiological Environmental Monitoring Program in the administrative controls section of the Technical Specifications and the relocation of procedural details to either the Offsite Dose Calculation Manual (ODCM) or the Process Control Program (PCP).

Consistent with this Generic Letter, SCE submitted Amendment Application No. 175 to the NRC by letter dated December 12, 1989. When submitted, Amendment Application No. 175 superseded portions of a previously submitted Application, Amendment Application No. 147. Amendment Application No. 147 requested changes to TS Sections 3.5.5, 3.5.9 and 4.1.3. Amendment Application No. 175 requested changes to 3.5.9 and 4.1.3 and superseded the changes to those sections requested by Amendment Application No. 147. However, changes to TS Section 3.5.5, "Containment Instrumentation" identified in Amendment Application No. 147 are still requested.

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By the above referenced letter, the NRC indicated that additional information in support of Amendment Application No. 175 or that changes to this Amendment Application were required before NRC approval could be obtained. Specifically, the NRC had the following observations regarding Amendment Application No. 175:

- "a. [Technical] Specification 6.5.2.9 allows the Station Manager to delegate approval authority. This action is contrary to the Generic Letter guidance.
- "b. The Generic Letter was fashioned after Standard Technical Specification (STS) requirements. The STS requires the Nuclear Safety Group (NSG) to conduct audits of the Radiological Environmental Monitoring Program (REMP), the Offsite Dose Calculation Manual (ODCM), and the Process Control Program (PCP). "Currently, the San Onofre Unit 1 Technical Specifications do not contain audit requirements of this nature. These requirements are necessary to assure continued maintenance and implementation of these programs and must be included in the Technical Specifications.
- "c. Proposed Specification 6.13 and 6.14 make reference to Specification 6.5.2.9. These specifications should more properly refer to specification 6.5.2.
- "d. Administrative/typographical errors or omissions exist in the proposed Specifications 6.9.1.8, 6.13.2 and 6.14.2. These errors must be corrected."

SCE has reviewed each of the NRC concerns identified above and the resolution for each is provided below:

- a. SCE has revised Technical Specification 6.5.2.8 and 6.5.2.9 to require the Station Manager to receive documentation of all actions conducted under these sections. Page 6.5-4 has been revised accordingly and is provided in the enclosure to this letter.
- b. The existing Technical Specifications for Unit 1 are not based on the STS. With respect to the non-STs wording in TS Section 6, SCE did not identify in the application that SCE desired to retain the existing Unit 1 TS Section 6.5.2, "Technical Review and Control", and Section 6.5.3, "Nuclear Safety Group" (NSG), administrative control requirements.

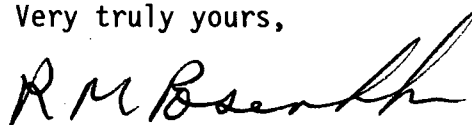
Accordingly, SCE believes that the existing Unit 1 TS Sections 6.5.2 and 6.5.3 accomplish the regulatory intent of ensuring periodic technical review and audit. Also, SCE's retention of the existing administrative controls, described in Sections 6.5.2 and 6.5.3 maintains consistency with the Units 2 and 3 Technical Specifications.

- c. Technical Specifications 6.13 and 6.14 have been revised to reference Technical Specification 6.5.2 instead of 6.5.2.9.
- d. The referenced administrative/typographical errors in Amendment Application 175 have been corrected by the changes discussed in items a) through c) above.

Consistent with the discussions provided above, the enclosed revised Technical Specification pages replace the corresponding pages that were submitted with Amendment Application No. 175.

SCE plans to implement the next revision of the ODCM on February 28, 1992, to reflect 1991 land use census data. Because Amendment Application 175, once approved by the NRC, will also necessitate a revision of the ODCM, SCE respectfully requests the effective date for Amendment Application 175 to be February 28, 1992. This will allow SCE to coordinate both changes to the ODCM in a single revision. If you have any questions, please contact 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

Enclosure