



Southern California Edison Company

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September 27, 1991

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

Gentlemen:

Subject: **Docket No. 50-206**
 Amendment Application No. 197
 San Onofre Nuclear Generating Station Unit 1

Reference: Letter, Mr. R. P. Zimmerman (NRC) to Mr. Kenneth P. Baskin (SCE),
 February 16, 1989

Enclosed is Amendment Application No. 197 to the Provisional Operating License No. DPR-13 for San Onofre Nuclear Generating Station, Unit 1. Amendment Application No. 197 consists of Proposed Change No. 239.

Proposed Change No. 239 is a request to revise Appendix A, Technical Specifications Section 3.5.1, "Reactor Trip System Instrumentation," Section 3.5.2, "Control Rod Insertion Limits," Section 3.5.3, "Control and Shutdown Rod Misalignment," Section 3.8, "Fuel Loading and Refueling," and Section 4.8, "Reactivity Anomalies." New Technical Specification Section 2.2, "Shutdown Margin" will be created. The proposed change will clarify core reactivity monitoring requirements in the current Unit 1 Technical Specifications. The need for these clarifications was reported in the enclosure to the referenced letter.

The referenced letter forwarded NRC Inspection Report No. 50-206/88-28 following a routine inspection conducted by Messrs. F. R. Huey, J. E. Tatum, and A. L. Hon during November 18, 1988 through January 7, 1989 and January 12, 1989. While reviewing the Southern California Edison (SCE) actions to monitor core reactivity during Unit 1 refueling outage, the NRC inspection team identified the need to clarify the reactivity monitoring requirements in the Unit 1 Technical Specifications.

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The enclosed amendment application implements changes to the Unit 1 Technical Specifications that will address the NRC's concerns. The proposed changes to the Technical Specifications are consistent with current Unit 1 operating procedures and practices.

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

Very truly yours,

Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
George Kalman, NRC 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