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April 6, 1992

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

Gentlemen:

**Subject: Docket No. 50-206
Amendment Application No. 202
Extension to Steam Generator Inspection Interval
San Onofre Nuclear Generating Station, Unit 1**

Enclosed is Amendment Application No. 202 to Facility Operating License No. DPR-13 for San Onofre Nuclear Generating Station, Unit 1 (SONGS 1). Amendment Application No. 202 consists of Proposed Change No. 251 which is a request for a 4-month extension to the steam generator inspection interval specified in the SONGS 1 Technical Specifications.

Section C.1 of SONGS 1 Technical Specification 4.16, "Inservice Inspection of Steam Generator Tubing," requires that inservice inspections of the steam generators be performed at a frequency of not less than 10 nor more than 24 calendar months after the previous inspection. The previous scheduled Technical Specification inservice inspection of SONGS 1 steam generators was completed on September 7, 1990. With the maximum interval of 24 calendar months between inspections currently allowed by the Technical Specification, the next inspection must be performed no later than September 7, 1992. This proposed change will provide for a 4-month extension to the inspection interval from 24 to 28 calendar months.

SONGS 1 is scheduled to be permanently shutdown in late 1992. The proposed extension to the inspection interval will preclude the need for a shutdown in September 1992 to perform the steam generator inspection.

Based on results of recent inspections and due to the current operational constraints implemented at SONGS 1, we have determined that no significant additional degradation of the steam generator tubes will occur during the proposed extension to the inspection interval. The impact of the proposed extension is discussed in detail in the enclosed amendment application.

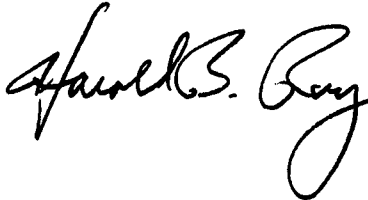
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The proposed change is similar to our request of October 31, 1989 for a 4-month extension to the steam generator inspection interval. This request was approved by the NRC in its Order confirming our commitments on Full Term Operating License open items dated January 2, 1990.

We request that the NRC act on the enclosed amendment application by June 1, 1992. This schedule will ensure that, in the event the application is denied, the plant can be shut down in an orderly manner in September 1992 for the inspection, as required by the current Technical Specification. We are prepared to discuss this matter with the NRC staff and to provide any additional information that may be necessary to facilitate expedited approval.

Very truly yours,



Enclosure

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