BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY for a Class 104(b) License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 1 of the San Onofre Nuclear Generating Station	)	DOCKET NO. 50-206 Amendment Application NO. 205

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 205.

This amendment application consists of Proposed Change No. 255 to the Unit 1 Facility Operating License No. DPR-13. Proposed Change No. 255 modifies the Technical Specifications, incorporated in Facility Operating License No. DPR-13 as Appendix A. The proposed change will revise Technical Specification 3.9, "MODERATOR TEMPERATURE COEFFICIENT (MTC);" Specification 3.3.3, "MINIMUM BORON CONCENTRATION IN THE REFUELING WATER STORAGE TANK (RWST) AND SAFETY INJECTION (SI) LINES AND MINIMUM RWST WATER VOLUME;" and Specification 3.5.2, "CONTROL ROD INSERTION LIMITS."

The proposed change is necessary to ensure that all accidents, including the Main Steam Line Break (MSLB) accident, are conservatively bounded by the Moderator Temperature Coefficient (MTC) Technical Specifications. The need for the change was identified following the recent discovery of an inconsistency between the stated basis for the MTC in the current Technical Specification and the methodology employed by Westinghouse for SONGS 1 accident analysis.

Based on the significant hazards analysis provided in the "Description and Significant Hazards Consideration Analysis" of Proposed Change No. 255, it is concluded that (1) the proposed change does not involve a significant hazards consideration as defined in 10 CFR 50.92, and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change.

Subscribed on this 1ST day of MAY , 1992.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Harold B. Ray
Harold B. Ray
Senior Vice President

Subscribed and sworn to before me this
1ST day of MAY , 1992.

OFFICIAL SEAL
BARBARA A. MC CARTHY
Notary Public-California
ORANGE COUNTY
My Commission Expires
March 31, 1995

Barbara A. McCarthy
Notary Public in and for the
State of California

James A. Beoletto
Attorney for
Southern California Edison Company

By: James A. Beoletto
James A. Beoletto

DESCRIPTION AND SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS
OF PROPOSED CHANGE NO. 255 TO THE TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSE NO. DPR-13

This is a request to revise the following sections of the Technical Specifications for San Onofre Nuclear Generating Station, Unit 1 (SONGS 1):

Specification 3.9, "MODERATOR TEMPERATURE COEFFICIENT (MTC);"

Specification 3.3.3, "MINIMUM BORON CONCENTRATION IN THE REFUELING WATER STORAGE TANK (RWST) AND SAFETY INJECTION (SI) LINES AND MINIMUM RWST WATER VOLUME;" and

Specification 3.5.2, "CONTROL ROD INSERTION LIMITS."

The purpose of this proposed change is to ensure that the MTC Technical Specification bounds all accidents, including the Main Steam Line Break (MSLB). This will be accomplished by revising the Technical Specification values for the most negative MTC limit, the safety injection line minimum boron concentration limit, and the minimum shutdown margin limit.

EXISTING TECHNICAL SPECIFICATIONS

See Attachment 1

PROPOSED TECHNICAL SPECIFICATIONS

See Attachment 2.

DESCRIPTION OF CHANGES

A reduction in the current end-of-cycle MTC limit in Technical Specification 3.9 is necessary to resolve an existing inconsistency between the Basis for MTC stated in the Technical Specification and the MSLB accident analysis for SONGS 1. To accommodate the revision to the MTC value, changes are also necessary to Technical Specification limits for safety injection (SI) line minimum boron concentration (Technical Specification 3.3.3), and shutdown margin (Technical Specification 3.5.2). These proposed changes are described in detail in the following sections.

CHANGES TO SPECIFICATION 3.9

The current Technical Specification 3.9(a) requires that the MTC for all rods withdrawn, end-of-cycle life, and the rated thermal power condition be less negative than -3.8×10^{-4} $\Delta k/k/°F$. Actions are required to be taken if this