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June 5, 1992

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

Gentlemen:

Subject: Docket No. 50-206
Amendment Application No. 188, Supplement 3
San Onofre Nuclear Generating Station, Unit 1

Reference: Amendment Application No. 188, Supplement 2, dated
September 9, 1991

Enclosed is Supplement 3 to Amendment Application 188, which is a revision to our previous submittal for Emergency Core Cooling System (ECCS) Technical Specifications (see reference). We have reduced the scope of our previous request to limit the changes to those which are needed to provide relief from unnecessary plant shutdowns under Specification 3.0.3, and to satisfy prior commitments made in Licensee Event Reports for the Containment Spray and Recirculation Systems (see enclosure). The enclosed change affects Section 3.3.1, "Safety Injection and Containment Spray Systems - Operating Status."

The existing specifications were written prior to the Standard Technical Specifications (STS), and therefore do not contain standard 72-hour action statement time limits. As a result, we have needed a Waiver of Compliance from Technical Specification 3.0.3 to perform routine maintenance or surveillances for Emergency Core Cooling System (ECCS) components. The proposed changes to the specifications will eliminate the need for additional waivers and the potential for unnecessary plant shutdowns.

We had previously requested extensive changes to Section 3.3 (ECCS) and several other specifications. Since we plan to shutdown Unit 1 at the end of the current fuel cycle, we are limiting our requested changes to a minimum to reduce the amount

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of review required for NRC approval. The enclosed changes are based on our discussions with the NRC.

If you have any questions or desire further information, please contact me.

Very truly yours,

Harold B. Ray
Senior Vice President

Enclosure

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