



Southern California Edison Company

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August 27, 1992

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

Gentlemen:

Subject: **Docket No. 50-206**
 Exemption Request From the Requirements of 10 CFR 50.71(e)
 San Onofre Nuclear Generating Station, Unit 1

Reference: Amendment Application No. 203, dated April 2, 1992.

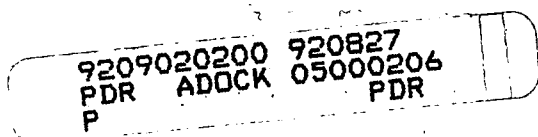
This letter requests an exemption from the annual update requirements of 10 CFR 50.71(e) for San Onofre Nuclear Generating Station Unit 1 (SONGS 1). 10 CFR 50.71(e) requires operating plant licensees to submit annually an update to their Final Safety Analysis Report (FSAR). The update to SONGS 1 FSAR is due on December 31, 1992. However, SONGS 1 will be permanently shutdown November 30, 1992.

Discussion

As discussed in the referenced Amendment Application, Unit 1 is scheduled to be shutdown November 30, 1992 at the conclusion of Cycle 11. SCE will commence core offload at the end of February or early March of 1993. Systems not required for fuel movement and safe storage of fuel will be taken out of service at that time. SCE expects that NRC approval of the referenced amendment application will result in the issuance of a Possession Only License (POL) by November 1992. The POL will not be effective until the core is offloaded. Because 10 CFR 50.71(e) only applies to power reactors licensed to operate, after issuance of the POL and completion of core offload, the provisions of 10 CFR 50.71(e) will no longer apply.

Therefore, unless the exemption request is granted, SCE would be required to submit Revision 4 to the UFSAR on December 31. This would be a large expenditure in manhours and capital expense with no visible benefit, considering the facility will enter a non operating configuration shortly after. Accordingly, SCE requests an exemption to the annual update requirement of 10 CFR 50.71(e) until the implementation of the POL at completion of core offload.

Regulatory Basis



We are requesting this exemption to the requirements of 10 CFR 50.71(e) under the provisions of 10 CFR 50.12 in that:

- Authorization for exemption from 50.71(e) is authorized by law and exemption is based on special circumstances due to the premature, permanent shutdown of SONGS 1. Following cessation from all power operations not providing an annual update to the UFSAR does not present an undue risk to the public health and safety. Exemption from 10 CFR 50.71(e) does not constitute any irreversible degradation to any system, structure, or component that would alter the choice among viable decommissioning alternatives,
- The principal activities following shutdown and defueling of the reactor is relegated to the safe storage of fuel; as such, modifications to the facility and changes to administrative processes will be minimal after all fuel is in long-term storage.

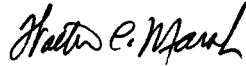
Defueled Safety Analysis Report

SCE recognizes that removing its authority to operate, and defueling the reactor are the last major activities for an operating reactor. However, pursuant to 10 CFR 50.59, future changes to the defueled facility need to be assessed to provide adequate assurance that the remaining systems, structures, and components are maintained and operated commensurate with their safety function during long-term fuel storage. Accordingly, SCE intends to develop and implement a Defueled Safety Analysis Report (DSAR). The DSAR will provide the Commission and licensee personnel with an accurate description of the systems, structures, components, and administrative controls necessary for the safe storage of fuel and processing of radiological waste. This will include the remaining accident analyses for the safe storage of fuel. The DSAR will be submitted with the proposed Decommissioning Plan.

Changes to the plant which would have been included in the Revision 4 UFSAR update that have an impact on the remaining systems, structures, or components important to safety will be incorporated into the DSAR. Pursuant to 50.71(e)(6), Revision 3 of the UFSAR shall be retained for historical purposes until the Commission terminates the license.

If you have any questions or comments regarding this exemption request, please call me.

Very truly yours,



Walter C. Marsh
Assistant Manager,
Nuclear Regulatory Affairs

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