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September 16, 1992

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

Gentlemen:

Subject: **Docket No. 50-206**  
**Amendment Application No. 206**  
**Exemption to Hot Safety Injection System Test Requirements**  
**San Onofre Nuclear Generation Station, Unit 1**

Enclosed is Amendment Application No. 206 to Facility Operating License No. DPR-13 for San Onofre Nuclear Generating Station, Unit 1 (SONGS 1). Amendment Application No. 206 consists of Proposed Change No. 257 which is a request for exemption to the Technical Specification requirements for a Hot Safety Injection System (SIS) Test.

Technical Specification 4.2.1.I.A, "Hot Safety Injection System Test," requires that a Hot SIS Test be performed in MODE 3 when the plant is being shutdown from MODE 1, and MODE 5 is planned to be entered. The test must be performed while the Reactor Coolant System pressure is above 1,500 psi.

The intent of Technical Specification 4.2.1.I.A is to ensure operability of the SIS if needed during future plant operation. Following the planned permanent shutdown and defueling of SONGS 1 at the end of the current fuel cycle (Cycle 11), the SIS will no longer be required. Therefore, the Hot SIS Test is not necessary during the planned permanent shutdown, and the intent of the test is no longer applicable. The NRC approval of this proposed change will exempt SCE from having to perform surveillance in accordance with Technical Specification 4.2.1.I.A during the planned permanent shutdown of SONGS 1.

The permanent shutdown of SONGS 1 is forecast to occur at the end of November 1992. We request that the NRC act on the enclosed amendment application by October 31, 1992. This schedule will allow us to make appropriate plans to perform the test in the event this application is denied by the NRC.

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If you have any question regarding this matter, or desire additional information, please contact me.

Very truly yours,

Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V  
George Kalman, NRC Senior Project Manager, San Onofre Unit 1  
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