

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

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

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY,
pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 206.

This amendment application consists of Proposed Change No. 257 to the Unit 1
Operating License No. DPR-13. Proposed Change No. 257 provides an exemption
to the surveillance requirements contained in the Technical Specifications
incorporated in Facility Operating License No. DPR-13 as Appendix A.

Technical Specification 4.2.1.I.A requires that a Hot Safety Injection System
(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 purpose of the
test is to assure operability of the SIS if needed during future plant
operation. However, in light of the planned permanent shutdown of SONGS 1,
the SIS will not be required to be operable following the shutdown, and
therefore, performance of a Hot SIS Test is not necessary for the final plant
shutdown. The proposed change will provide for an exemption from having to
perform this test as required by Technical Specification 4.2.1.I.A.

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Based on the significant hazards analysis provided in the "Description and Significant Hazards Consideration Analysis of Proposed Change No. 257 to the Technical Specifications," 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.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: HE Morgan
H.E. Morgan
Vice President & Site Manager

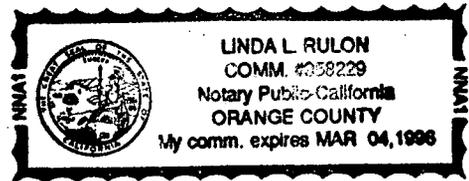
State of California

County of San Diego

on September 16, 1992 before me, Linda L. Rulon, Notary Public
personally appeared H. E. Morgan, personally known to
me to be the person whose name is subscribed to the within instrument
and acknowledged to me that he executed the same in his authorized
capacity, and that by his signature on the instrument the person, or the
entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Linda L. Rulon



James A. Beoletto
Attorney for Southern
California Edison Company

By: [Signature]
James A. Beoletto

**DESCRIPTION AND SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS
OF PROPOSED CHANGE NO. 257 TO THE TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSE NO. DPR-13**

This is a request for an exemption to the requirements of Technical Specification 4.2.1.I.A, "Hot Safety Injection System Test," included as part of Appendix A to the San Onofre Nuclear Generating Station Unit 1 (SONGS 1) Facility Operating License.

Existing Technical Specifications

See Attachment 1.

Proposed Technical Specifications

See Attachment 2

Description of Change

Item (1) of SONGS 1 Technical Specification 4.2.1.I.A, "Hot Safety Injection System Test," requires that a hot Safety Injection System (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 (RCS) pressure is above 1,500 psi. The test includes determination of the force required to open Main Feed Pump Safety Injection Discharge valves HV-851A and HV-851B, and the margin of available actuation force. The proposed change will provide for an exemption to the requirement to perform the hot SIS test during the anticipated permanent shutdown of SONGS 1 in November 1992 following the current Cycle 11 operation.

The proposed change will also correct a typographical error in item (1) of Specification 4.2.1.I.A so that the valves are identified correctly as HV-851 A and B.

Discussion

Valves HV-851A and HV-851B provide a discharge flowpath from the main feed pumps to the safety injection header. The purpose of the Hot SIS Test is to assure that long-term set of the valve seat faces on the valves has not excessively increased the force required to operate the valves. The surveillance assures that the valves will operate if needed for safety injection during future plant operation. According to the current surveillance Technical Specification 4.2.1.I.A, the test must be performed in MODE 3 while the RCS pressure is above 1,500 psi, when the plant is being shutdown from MODE 1, and MODE 5 is planned to be entered. Therefore, the Technical Specification test requirement would apply during the final shutdown

sequence of SONGS 1.

The intent of Technical Specification 4.2.1.I.A is to ensure future operability of the SIS. With the scheduled permanent shutdown and defueling of SONGS 1 following the current operating Cycle 11, the availability of the SIS beyond this cycle is no longer a concern. 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 the surveillance in accordance with Technical Specification 4.2.1.I.A during the planned permanent shutdown of SONGS 1.

The remaining proposed change to Specification 4.2.1.I.A simply corrects an existing typographical error in the identification of the valves, and is unrelated to the proposed exemption to performance of the Hot SIS Test.

Significant Hazards Consideration Analysis

In accordance with 10CFR50.91(a)(1), the following analysis is provided to demonstrate that the proposed change does not represent a significant hazards consideration. According to 10CFR50.92(c), the proposed change discussed above is deemed to involve a significant hazards consideration if there is a positive finding in any one of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The Technical Specification requires that the hot SIS test be performed while the plant is being brought down from Mode 1, and Mode 5 is planned to be entered. The purpose of the test is to assure that the SIS will be operable if needed during future plant operation. Therefore, the requirement for the test is based on the assumption that the plant will be brought back up to power subsequently, and the plant operation will continue. In the case of SONGS 1 however, the plant is being shutdown permanently, and therefore, the SIS will not be required to be operable following the shutdown. Consequently, the requirement for the hot SIS test is not applicable to SONGS 1 permanent shutdown. The proposed exemption will eliminate the need to perform this test.

The proposed exemption will have no impact on the plant design, operation, or the operability of SIS in Modes 1-3, as required, while the plant is being shutdown. The exemption will mean that the operability of the SIS cannot be assured for subsequent fuel cycles. However, the future SIS operability is not needed since the plant is being shutdown permanently. As a practical matter, exemption from the test will eliminate any risks that may be associated with the test while the plant is being shutdown, and allow entry into Mode 5 to be made sooner. Therefore, the proposed exemption to the Technical Specification requirement will not result in an increase in the probability of an accident previously evaluated. Since

the SIS will not be needed following the permanent shutdown of the plant, the proposed exemption will not result in an increase in the consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change will provide for an exemption to the requirement to perform a hot SIS test while the plant is being shutdown permanently. Since this requirement has no impact on the current operation of the SIS, the exemption to perform this test will not lead to any reduction in the capability of the SIS during the current fuel cycle. The proposed exemption has no impact on the existing plant design, operation, or safety analyses. Nor does it have any impact on any factors that could create accidents. Consequently, the proposed exemption will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in margin of safety?

Response: No

The proposed exemption will have no impact on the existing plant design or the safety analyses, and therefore, will not involve a significant reduction in margin of safety.

Safety and Significant Hazards Determination

Based on the above safety analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.92; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) the proposed change will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.