

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

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Docket NO. 50-206
Amendment Application
NO. 208

SOUTHERN CALIFORNIA EDISON COMPANY, and SAN DIEGO GAS & ELECTRIC COMPANY,
pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 208.

This amendment application consists of Proposed Change No. 260 to the Unit 1
Operating License No. DPR-13. Proposed Change No. 260 is a request to change
Technical Specifications 6.9.1.8, "Semiannual Radioactive Effluent Release
Report," and 6.14, "Offsite Dose Calculation Manual," following the provisions
provided in 10 CFR 50.36a. This proposed change would extend the Radioactive
Effluent Release Report submittal frequency from semiannual to annual.

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Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

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

State of California
County of Orange

On 11/18/92 before me, Mariane Sanchez, Notary Public,
personally appeared Harold B. Ray, 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 Mariane Sanchez



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. 260 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 6.9.1.8, "SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT";

and

Specification 6.14, "OFFSITE DOSE CALCULATION MANUAL (ODCM)."

The purpose of this proposed change is to ensure the Technical Specifications addressing the Radioactive Effluent Release Report are consistent with the recently amended 10 CFR 50.36a(a)(2).

EXISTING TECHNICAL SPECIFICATIONS

See Attachment 1

PROPOSED TECHNICAL SPECIFICATIONS

See Attachment 2

DESCRIPTION OF CHANGES

Technical Specification 6.9.1.8 addresses the Radioactive Effluent Release Report and establishes a semiannual submittal frequency. This proposed change extends the report submittal frequency to annual (vice semiannual), consistent with the recently amended 10 CFR 50.36a(a)(2).

Technical Specifications 6.14.2.1 and 6.14.2.3 address changes to the ODCM, and require any changes be submitted to the Commission along with the submittal of the Semiannual Radioactive Effluent Release Report. This proposed change identifies the Radioactive Effluent Release Report as "Annual" to be consistent with the new submittal frequency.

DISCUSSION

In an effort to reduce regulatory burden, 10 CFR 50.36a, "Technical specifications on effluents from nuclear power reactors," was amended on October 1, 1992, (FR 39353) to extend the submittal frequency of the Radioactive Effluent Release Report from semiannual to annual. The existing TS 6.9.1.8 requires a semiannual report covering the operation of the unit during the previous 6 months of operation to be submitted within 60 days after January 1 and July 1 of each year.

The proposed change will require a report covering operation of the unit during the previous calendar year to be submitted before May 1 of each year. The May 1 date was selected to ensure sufficient time to prepare a complete response, and is consistent with the May 1 due date established in TS 6.9.1.6 for the Annual Radiological Environmental Operating Report.

Existing TS 6.14.2.1 and 6.14.2.3 refer to the semiannual report. These areas of the TSs will also be modified to uniformly implement the proposed change. These changes are consistent 10 CFR 50.36a(a)(2).

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

In accordance with 10 CFR 50.91(a)(1), the following analysis is provided to demonstrate that the proposed change does not represent a significant hazards consideration. According to 10 CFR 50.92(c), the proposed change discussed above is deemed to involve a significant hazards consideration if there is a positive finding in any 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

This change is administrative in nature and makes the TSs consistent with the amended requirement of 10 CFR 50.36a(a)(2). There is no change to plant design, operation, or configuration. Therefore, there is no significant increase in the probability or 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 type of accident from any accident previously evaluated?

Response: No

This change is administrative in nature and makes the TSs consistent with the amended requirement of 10 CFR 50.36a(a)(2). There is no change to plant design, operation, or configuration. Therefore, this change does not create the possibility of a new or different type of accident from any accident previously evaluated.

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

Response: No

This change is administrative in nature and makes the TSs consistent with the amended requirement of 10 CFR 50.36a(a)(2). There is no change to plant design, operation, or configuration. Therefore, there is no reduction in a 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 10 CFR 50.92; 2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and 3) this action 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.