

UNITED STATES OF AMERICA  
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

) Docket No. 50-206

) Amendment Application  
) No. 214

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY,  
pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 214.

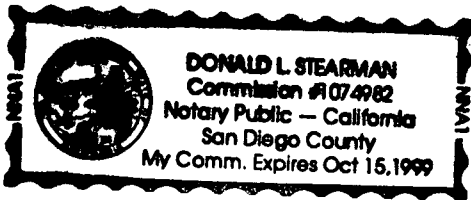
This amendment application consists of Proposed Change Number 265 to Facility  
Operating License No. DPR-13. Proposed Change No. 265 is a request to revise  
the San Onofre Unit 1 License Condition 2.D. License Condition 2.D is  
requested to be modified to delete License Condition 2.C(4) from the reporting  
requirements delineated in 2.D.

Subscribed on this 22nd day of December, 1995

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Richard M. Rosenblum  
Richard M. Rosenblum  
Vice President



State of California  
County of San Diego

On December 22, 1995 before me, Donald L. Stearman,  
personally appeared Richard M. Rosenblum, 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 Donald L. Stearman

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**DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NUMBER 265**

Proposed Change Number 265 is a request to revise License Condition 2.D of Facility Operating License DPR-13 for the San Onofre Nuclear Generating Station (SONGS) Unit 1.

**EXISTING LICENSE CONDITIONS 2.D**

See Attachment 1

**PROPOSED LICENSE CONDITIONS**

See Attachment 2

**DESCRIPTION OF CHANGE**

This proposed change requests the reference to License Condition 2.C(4) be deleted from License Condition 2.D to eliminate the redundant reporting requirement for violations of the physical protection program plans. The reporting requirements and criteria for the physical protection program are specified in 10CFR73.71 and 10CFR73 Appendix G. Therefore, reporting physical protection events under License Condition 2.D is redundant and not necessary.

**DISCUSSION**

This proposed change, which is a request to revise License Condition 2.D, is considered an administrative change. The physical protection program at SONGS will not be changed or modified as a result of PCN-265. The physical protection program will continue to be implemented and maintained in accordance with the NRC approved physical security, security force training and qualification, and safeguards contingency plans.

Included in License Condition 2.D is the requirement to report violations of the requirements contained in License Condition 2.C(4), the license condition for the physical protection program. The physical protection program has specific reporting requirements located in 10CFR73.71 and 10CFR73 Appendix G. The reporting under License Condition 2.D is duplicative, not specific to the physical protection program, and consequently, unnecessary. This proposed change removes License Condition 2.C(4), physical protection, from License Condition 2.D, reporting requirements.

**SAFETY ANALYSIS**

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

Response: No

This proposed change is considered an administrative change. It has no impact on the probability or consequences of any of the accidents previously evaluated. This change revises License Condition 2.D to remove the burden of duplicate reporting requirements. This change does not affect the physical protection program as previously approved by the Nuclear Regulatory Commission (NRC).

A reporting requirement in License Condition 2.D is being revised to remove the reference to License Condition 2.C(4) for the physical protection program. The reporting requirements for the physical protection program are located in the regulations, 10CFR73.71 and 10CFR73 Appendix G.

Therefore, the probability and consequences of an accident previously evaluated are not affected by these proposed changes.

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

Response: No

This proposed change is considered an administrative change. It has no impact on equipment, systems, or structures such that a new or different kind of accident is created. This change revises License Condition 2.D to remove duplicate and unnecessary reporting requirements for the physical protection program. There is no change associated with the implementation and maintenance of the physical protection program as previously approved by the NRC.

Therefore, the possibility of a new or different kind of accident from an accident previously evaluated is not created.

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

Response: No

This proposed change is considered an administrative change only. It has no impact on the margin of safety associated with the physical protection program. This change revises License Condition 2.D to remove duplicative and unnecessary reporting requirements for the physical protection program. The maintenance and implementation of the physical protection program is not affected by this change.

Therefore, there will not be a significant 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 10CFR50.92 and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change. Moreover, because this action does not involve a significant hazards consideration, it will also not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT 1  
EXISTING LICENSE CONDITION  
UNIT 1