

**Southern California Edison Company**

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June 11, 1990

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

Gentlemen:

Subject: Docket No. 50-206  
Amendment Application No. 178  
San Onofre Nuclear Generating Station  
Unit 1

This letter submits Amendment Application No. 178. This is a request to revise the Appendix A Technical Specifications 3.0 and 4.0 to implement the recommendations of Generic Letter 87-09 and subsequent guidance provided by the NRC. Amendment Application No. 178 contains Proposed Change No. 187 (PCN-187).

Technical Specifications 3.0 and 4.0 provide General Limiting Conditions for Operation (LCOs) and General Surveillance Requirements for SONGS 1. Section 3.0 addresses operational requirements to be implemented when circumstances arise which are not identified within LCOs for individual technical specifications. Section 4.0 defines the conditions under which the surveillance requirements are applicable. The changes to be implemented by PCN-187 will result in improved implementation of LCOs and surveillance requirements. For example, the changes include guidance for addressing missed surveillances.

The guidance provided by GL 87-09 was implemented into PCN-187 with two exceptions. First, the revisions to Specification 3.0.4 and portions of the basis to 3.0.4 recommended by GL 87-09 are not incorporated as a result of clarification obtained during discussions with the NRC staff. Second, the recommended changes to the basis for Specification 4.0.5 regarding inservice inspection and testing requirements were not incorporated. The SONGS 1 Technical Specification 4.7, Inservice Inspection Requirements, provides the requirements and basis for inservice inspection.

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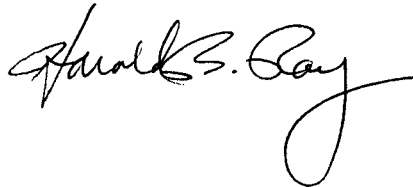
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This requirement is specifically for SONGS 1 and is not consistent with the standard technical specification. These two exceptions are discussed in further detail in PCN-187.

If you have any questions regarding this amendment application, please call me.

Very truly yours,



Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V  
C. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3  
J. H. Hickman, California Department of Health Services