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HAROLD B. RAY
SENIOR VICE PRESIDENT

June 15, 1990

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

Gentlemen:

Subject: Docket No. 50-206
Supplement to Amendment Application No. 161 Regarding
Reactor Protection System Instrumentation
San Onofre Nuclear Generating Station, Unit 1

Reference: NRC to SCE letter dated October 31, 1989; Amendment Application
No. 161 Regarding Increased Surveillance Intervals For RPS Testing
for San Onofre Nuclear Generating Station, Unit 1

This letter provides a supplemental change to Amendment Application No. 161
consisting of Proposed Change No. 183 (PCN 183), Revision 1, which addresses
open Systematic Evaluation Program (SEP) issues and Generic Letter 85-09
regarding testing of Reactor Trip System and Engineered Safety Features.

BACKGROUND

Amendment Application No. 161 was initially submitted on December 29, 1988.
It included the following:

- (1) A request to incorporate Limiting Conditions for Operation and surveillance requirements in the Technical Specifications to address issues pertaining to SEP Topic VI-10.A, "Testing of Reactor Trip System and Engineered Safety Features, Including Response Time Testing."
- (2) Westinghouse recommendations to increase surveillance intervals for Reactor Protection System components as documented in WCAP-10271, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System."
- (3) Requirements for the testing of the reactor trip breakers undervoltage and shunt trip attachments, in response to Generic Letter 85-09, "Technical Specifications for Generic Letter 83-28, Item 4.3."

Your letter dated October 31, 1989 requested additional information regarding the proposed change to extend the RPS instrumentation surveillance intervals.

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DISCUSSION

In response to your questions, we conducted a detailed review of the PCN. The Westinghouse Owners Group (WOG) recommendations to extend RPS surveillance intervals are consistent with WOG guidelines and are based on the design of a Westinghouse generic plant that conforms to the Westinghouse Standard Technical Specifications (STS).

Since SONGS 1 is not consistent with the Westinghouse generic design or the STS, we are withdrawing our request to extend the RPS instrumentation surveillance intervals, pending further evaluation. The enclosed revision to PCN 183 only requests NRC approval of technical specification changes related to the above discussed SEP topic and generic letter. We are continuing our evaluation of the applicability of the WOG guidelines to the SONGS 1 design. If we determine the guidelines are applicable, then we will submit a separate amendment request to incorporate the appropriate changes related to increased surveillance intervals.

If you have any questions regarding this matter, please let me know.

Very truly yours,



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