

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. 187
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY,
pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 187.

This amendment application consists of Proposed Change No. 232 to Provisional Operating License No. DPR-13. Proposed Change No. 232 modifies the Technical Specifications incorporated in Provisional Operating License No. DPR-13 as Appendix A to correct an erroneous reference to a National Fire Protection Association standard concerning training of fire brigade members. The edition listed in the Technical Specification is National Fire Protection Association Standard No. 27, 1976 edition. The correct reference is National Fire Protection Association Standard No. 27, 1975 edition.

Based on the significant hazards analysis provided in the Description and Significant Hazards Consideration Analysis of Proposed Change No. 232, 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.

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Subscribed on this 22nd day of August, 1990.

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

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

Subscribed and sworn to before me this
22nd day of August.

Holly D. Roset

Notary Public in and for the
State of California



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. 232
TO PROVISIONAL OPERATING LICENSE NO. DPR-13

DESCRIPTION

This is a request for NRC approval to change Technical Specification Section No. 6.4.2. A change is necessary to correct a reference to an erroneous edition of a National Fire Protection Association (NFPA) standard regarding training of fire brigade members.

The need for this change to the Technical Specification was discovered during ongoing, internal Southern California Edison (SCE) Quality Assurance reviews and audits of SCE engineering, operations, and licensing activities that are routinely performed to assure conformance to all regulatory requirements and company procedures.

EXISTING TECHNICAL SPECIFICATION

See Attachment 1.

PROPOSED TECHNICAL SPECIFICATION

See Attachment 2.

DISCUSSION

Technical Specification Section No. 6.4.2 presently references Standard No. 27 of the National Fire Protection Association Code - 1976 when specifying the training program requirements for the fire brigade. This reference is in error since there is no edition of NFPA Standard No. 27 that is dated 1976. This proposed change requests that the correct NFPA edition date of 1975 be reflected in the Technical Specification. Therefore, it is requested that the reference in Technical Specification Section No. 6.4.2 be as follows: "National Fire Protection Association Standard No. 27-1975". When preparing Proposed Change No. 62, which initiated this error, SCE personnel inadvertently used the issue date for the NFPA Code edition as a whole (1976), rather than the issue date for standard itself (1975).

As discussed below, there are no significant hazards associated with this Technical Specification change. This proposed change is administrative in nature and, as such, does not create new accidents, modify existing accident probabilities or consequences, or impact safety margins.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

As required by 10 CFR 50.91(a)(1) this analysis is provided to demonstrate that the proposed license amendment to correct typographical errors and oversights and update the Technical Specifications does not represent a significant hazards consideration. As demonstrated below, in accordance with the three factor test of 10 CFR 50.92(c), implementation of the proposed amendment was analyzed using the following standards and found not to:

- 1) involve a significant increase in the probability or consequences of an

accident previously evaluated; or 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety.

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 operation of San Onofre Unit 1, in accordance with this proposed change, will not involve a significant increase in the probability or consequences of an accident previously evaluated. This proposed change involves only a clarification of a reference to an incorrect edition of NFPA Standard No. 27. This change will result in the Technical Specification referencing the edition of the NFPA standard on which the fire brigade training is based, rather than the yearly issue date of the NFPA Code. Therefore, this change will improve the quality of Technical Specification Section No. 6.4.2. The change is administrative in nature and will not affect accident probabilities or consequences.

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 revision is administrative in nature and does not affect previously analyzed accidents or create any new accidents. Therefore, it is concluded that operation of the facility in accordance with this proposed change does not create the possibility of a new or different kind of accident.

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

The proposed revision is an administrative change only. It does not impact any margin of safety. Therefore, it is concluded that operation of the facility in accordance with this proposed change does not involve a significant reduction in a margin of safety.

SAFETY AND SIGNIFICANT HAZARDS DETERMINATION

Based on the preceding analysis, it is concluded that: (1) Proposed Change No. 232 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.

Attachment 1 - Existing Technical Specification
Attachment 2 - Proposed Technical Specification

PCN-232.SN2

ATTACHMENT 1

EXISTING TECHNICAL SPECIFICATION

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Manager, Nuclear Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager, Station Emergency Preparedness and shall meet or exceed the requirements of Section 27 of the National Fire Protection Association Code - 1976.