Docket No. 50-206

Mr. Kenneth P. Baskin Vice President Southern California Edison Company 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770

Dear Mr. Baskin:

SUBJECT: SPENT FUEL TRANSSHIPMENT - (TAC NO. 66869)

We have completed our review of your letters of December 24, 1987 and February 4, 1988 on the issue of whether or not a license amendment is required for spent fuel transshipment from San Onofre Unit 1.

You state in your February 4 letter that an amendment is not required because handling of the cask is consistent with NRC's previous review and resolution of heavy loads issues. Although it is correct that handling of a cask consistent with the seven guidelines of NUREG-0612 provides increased assurance of safe load handling, this does not constitute a general license to handle any and all heavy loads. The appropriate test for deciding whether an amendment is required for heavy load handling or for other issues is 10 CFR 50.59, specifically whether or not an unreviewed safety question or a change in the technical specifications is involved.

We have concluded that at least two of the criteria of 10 CFR 50.59 for an unreviewed safety question are met and that a change to the technical specifications is required. We have discussed this conclusion with you and your staff, including meetings on March 17, March 24 and April 6, 1988. Accordingly, if you desire to engage in the activities as described in your letters of December 24, 1987 and February 4, 1988, Southern California Edison Company must submit, and have approved, an application for a license amendment pursuant to 10 CFR 50.90.

Sincerely,

original signed by Dennis Crutchfield for

Frank J. Miraglia
Associate Director for Projects
Office of Nuclear Reactor Regulation

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Mr. Dennis M. Smith, Chief Radiological Programs Division Governor's Office of Emergency Svcs. State of California 2800 Meadowview Road Sacramento, California 95832



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

April 14, 1988

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Sincerely,

Frank J. Miraglia

Associate Director for Projects

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