

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON )  
COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY )  
for a Class 104(b) License to Acquire, ) DOCKET NO. 50-206  
Possess, and Use a Utilization Facility as )  
Part of Unit No. 1 of the San Onofre Nuclear ) Amendment No. 152  
Generating Station )

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC  
COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 152.

This amendment consists of Proposed Change No. 188 to Provisional  
Operating License No. DPR-13. Proposed Change No. 188 modifies the Technical  
Specifications incorporated in Provisional Operating License No. DPR-13 as  
Appendix A.

Proposed Change No. 188 is a request to revise Appendix A Technical  
Specification Section 6.5 requirements in the area of Nuclear Safety Group  
(NSG) review responsibilities. The revision is an administrative change that  
will reduce the scope of NSG required reviews in order to allow a focus of NSG  
resources as required by safety significance.

In the event of conflict, the information in Amendment Application  
No. 152 supersedes the information previously submitted.

Based on the significant hazards analysis provided in the Description and Significant Hazards Consideration Analysis of Proposed Change No. 188, 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.

Pursuant to 10 CFR 170.12, the fee of \$150 is herewith remitted.

Subscribed on this 1st day of July, 1988.

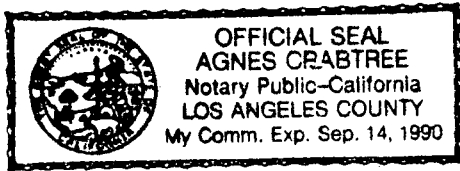
Respectfully submitted,  
SOUTHERN CALIFORNIA EDISON COMPANY

By: Kenneth P. Baskin  
Kenneth P. Baskin  
Vice President

Subscribed and sworn to before me this  
1st day of July 1988.

Agnes Crabtree  
Notary Public in and for the County of  
Los Angeles, State of California

My Commission Expires: Sept 14, 1990



Charles R. Kocher  
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Attorneys for Southern  
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By: James A. Beoletto  
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Subscribed on this 27th day of June, 1988.

Respectfully submitted,  
SAN DIEGO GAS & ELECTRIC COMPANY

By: *Gary D. Cotton*  
Gary D. Cotton  
Senior Vice President  
Engineering & Operations

Subscribed and sworn to before me this

27 day of June.



*Stephanie E. Hitt*  
Notary Public in and for the County of  
San Diego, State of California

My Commission Expires: 8/30/91

David R. Pigott  
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By: *David R. Pigott*  
David R. Pigott

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN )  
CALIFORNIA EDISON COMPANY )  
and SAN DIEGO GAS & ELECTRIC )  
COMPANY (San Onofre Nuclear )  
Generating Station Unit No. 1 )

Docket No. 50-206

CERTIFICATE OF SERVICE

I hereby certify that a copy of Amendment Application No. 152 was served on the following by deposit in the United States Mail, postage prepaid, on the Fifth day of July, 1988.

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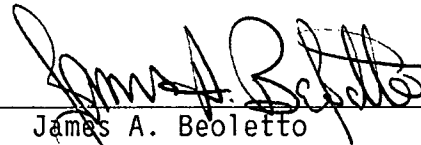
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James A. Beoletto

DESCRIPTION AND SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS OF  
PROPOSED CHANGE NO. 188 TO THE TECHNICAL SPECIFICATIONS  
PROVISIONAL OPERATING LICENSE NO. DPR-13

This is a request to revise Section 6.5.3, "NUCLEAR SAFETY GROUP (NSG)" of the Appendix A Technical Specifications for San Onofre Nuclear Generating Station, Unit 1 (SONGS 1).

DESCRIPTION OF CHANGE

Technical Specification 6.5.3.4 addresses the review responsibilities for procedure revisions, equipment design changes, tests and experiments and events reported to the Nuclear Regulatory Commission. Proposed Change No. 188 would delete the Nuclear Safety Group review responsibilities outlined in Technical Specification requirements 6.5.3.4.a and 6.5.3.4.g.

EXISTING SPECIFICATION

See Attachment 1

PROPOSED SPECIFICATION

See Attachment 2

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

As required by 10 CFR 50.91(a)(1), this analysis is provided to demonstrate that a proposed license amendment to implement a revision to the Nuclear Safety Group review responsibilities for SONGS 1 represents a no significant hazards consideration. In accordance with the three factor test of 10 CFR 50.92(c), implementation of the proposed license amendment was analyzed using the following standards and found not to: 1) involve a significant increase in the probability or consequences for 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.

Analysis

The activities described in Sections 6.5.3.4.a and 6.5.3.4.g currently receive extensive technical and managerial review before being sent to the corporate review group for another independent review. Specifically, Technical Specification 6.5.2, "Technical Review and Control," contains detailed requirements for processing changes to plant procedures, equipment and tests and experiments. These requirements include both independent technical review and management approval. Interdisciplinary reviews which encompass more than five diverse technical organizations, by personnel of education and experience levels that meet or exceed that required for the Nuclear Safety Group staff, as well as the management chain for these organizations, are currently performed for each of these items. Thus, the review by the Nuclear Safety Group (NSG) is redundant to previous reviews and is not required. The proposed change would, therefore, delete Technical Specification paragraphs 6.5.3.4.a and 6.5.3.4.g.

No change in Nuclear Safety Group staff is involved in the proposed change. The proposed change will allow SCE the flexibility to focus resources on significant plant events, innovative programs (such as probabilistic risk assessment of key areas of plant performance), conceptual review of plant changes (while the engineering work is in progress), and other appropriate activities. This change is intended to improve the utilization of Nuclear Safety Group personnel by removing the requirement to participate in processes which already receive a high level of review, thereby allowing them to focus their efforts on "significant operating abnormalities," "violations of codes, regulations... having nuclear safety significance," "indications of unanticipated deficiencies," and "changes... which involve an unreviewed safety question" as described in the remaining list of NSG responsibilities in Technical Specification 6.5.3.4.

Conformance of the proposed changes to the standards for a determination of no significant hazard as defined in 10 CFR 50.92 (three factor test) is shown in the following:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

RESPONSE: NO

Technical Specifications currently require the Nuclear Safety Group (NSG) to review, among other things, 1) safety evaluations for a) changes to procedures required by Specification 6.8, equipment or systems, and b) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question and 2) events requiring written notification to the Commission. The proposed change would eliminate the requirement for NSG review of the above items based upon the fact that such items receive interdisciplinary and technically cognizant management reviews prior to receipt by the NSG. Thus, since adequate reviews are being performed, approval of the proposed change will eliminate unnecessary duplication of review efforts and allow SCE to focus NSG efforts on other safety issues. Therefore, operation of this facility in accordance with this proposed change will not involve a significant increase in the probability or consequences of accidents previously evaluated.

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

For the reasons discussed in response to item 1 above, this change is administrative in nature only and does not affect plant equipment, operating processes, or the accident analysis. Therefore, the proposed change will 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?

RESPONSE: NO

For the reasons discussed in response to item 1 above, the revision to Technical Specification 6.4 is responsive to a revised rule and is administrative in nature. This change is administrative in nature only and does not affect the safety analysis or underlying assumptions. Therefore, the proposed change will not affect any margin of safety.

SAFETY AND SIGNIFICANT HAZARDS CONSIDERATION 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 10 CFR 50.92 and (2) the health and safety of the public will not be endangered by the proposed change.

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