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**Southern California Edison Company**

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VICE PRESIDENT

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March 20, 1989

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

Gentlemen:

Subject: Docket No. 50-206  
Amendment Application No. 167  
San Onofre Nuclear Generating Station  
Unit 1

Enclosed is Amendment Application No. 167 to Provisional Operating License DPR-13. Amendment Application No. 167 consists of Proposed Change No. 200 which is a request to revise Appendix A, Technical Specifications, of Provisional Operating License No. DPR-13.

Specifically, Proposed Change No. 200 is a request to revise Sections 3.14, "Fire Protection Systems Operability," and 4.15, "Fire Protection Systems Surveillance," of Appendix A Technical Specifications for the San Onofre Nuclear Generating Station, Unit 1 (SONGS 1). This change incorporates and supercedes Proposed Change No. 136 submitted by Amendment Application No. 120 dated June 8, 1984, as revised by SCE to NRC letter dated December 17, 1985, and Proposed Changes No. 159 and No. 162 submitted by Amendment Application No. 136 dated May 19, 1986. Additionally, this change incorporates resolution of the NRC staff's comments resulting from the March 23, 1988 meeting between SCE and the NRC staff members. Supplemental information concerning non-rated barrier surveillance and the basis for fire water pump(s) pressure requirements have been included as Attachment 3. This attachment also includes an evaluation of the methods utilized to measure boron concentration with the Post Accident Sampling System.

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This proposed change has resulted from modifications installed to comply with the safe shutdown requirements of 10 CFR 50 Appendix R and BTP 9.5.1, Appendix A. This proposed change also incorporates guidance from NRC Generic Letter 87-09 to Section 3.0 "Limiting Conditions for Operation (General)" applicable to Sections 3.14 and 4.15. A specific application amendment for NRC Generic Letter 87-09 will be submitted by May 15, 1989. We request issuance of this Amendment and future application concurrently.

It should be noted that this proposed change is a general revision, hence, no revision bars are indicated. Your review and approval of this proposed change and the outstanding Request for Exemption (fire area 1-YD-11-34; provided by SCE letter dated July 30, 1987) resolves all outstanding fire protection issues for Unit 1.

Very truly yours,



Enclosure

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