Southern California Edison Company
23 PARKER STREET
IRVINE, CALIFORNIA 92718

F. R. NANDY
MANAGER OF NUCLEAR LICENSING

TELEPHONE
(714) 587-5400

December 19, 1989

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

Gentlemen:

Subject: Docket No. 50-206
UFSAR Annual Update Submittal Exemption Request
San Onofre Nuclear Generating Station
Unit 1

The purpose of this letter is to request a 2 month extension from the requirements of 10 CFR 50.71 for the first annual update of the SONGS Unit 1 UFSAR. This request is made in accordance with the provisions of 10 CFR 50.12. The initial update of the UFSAR was provided to the NRC by letter dated December 23, 1988. In accordance with 10 CFR 50.71 and as committed to in the December 23, 1988 letter, the first revision to the UFSAR (Rev. 1) is due December 29, 1989. A good faith effort has been made to comply with the requirement of 10 CFR 50.71, paragraph (e)(4), however SCE will not be able to submit the SONGS 1 UFSAR, Rev. 1 by December 29, 1989 for the following reasons.

1. SONGS 1 UFSAR Rev. 0, issued in December 1988, was not available during the development and preparation of the Cycle 10 refueling outage modification design changes. The Cycle 10 refueling outage started on November 28, 1988. Therefore, there was no base document to use in the preparation of proposed UFSAR changes that would be required to reflect the proposed Cycle 10 modifications. As a result of this, all UFSAR Rev. 1 changes were developed after the Cycle 10 design change modifications were implemented.

2. There were a large number of approved proposed facility changes (PFCs) (over 250 PFCs) implemented during the Cycle 10 refueling outage which were reviewed for possible incorporation into the UFSAR update. Since SONGS 1 did not return to service from the Cycle 10 refueling outage until July 31, 1989, only 5 months were available to complete the UFSAR update.

8912200430 891219
PDR ADOCK 05000206
P PDC

A053
1/0

We have made substantial progress and the SONGS 1 UFSAR update is approximately 85% complete. However, with the current work load, SCE is unable to meet the December 29, 1989 SONGS 1 UFSAR, Rev. 1 submittal date. Therefore, in accordance with the provisions of 10 CFR 50.12 paragraph (a)(2)(v), a 2 month extension from the requirements of 10 CFR 50.71 paragraph (e)(4) for the submittal of the SONGS 1 UFSAR Rev. 1 is requested.

We regret that this request is being submitted only a few days prior to the due date. This late submittal occurred because a maximum effort to meet the due date has been maintained, and we only recently concluded that the additional time would be needed in order to resolve final comments and achieve required quality in the completed UFSAR revision.

If you have any questions or if we can provide additional information, please let me know.

Very truly yours,

L_NRC.DP2

cc: J. B. Martin, Regional Administrator, NRC Region V
C. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3