Southern California Edison Company

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BICHARD M. ROSENBLUM VICE PRESIDENT

April 18, 1994

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

Gentlemen:

Subject:

Docket No. 50-206

Amendment Application No. 209

San Onofre Nuclear Generating Station, Unit 1

Reference: Letter dated December 28, 1993, from NRC to SCE, Issuance of Amendment No. 155 to Facility Operating License No. DPR-13, San Onofre Nuclear Generating Station, Unit No. 1, Permanently Defueled Technical Specifications (TAC NO. M86377)

Enclosed is Amendment Application No. 209 to the Operating (Possession Only) License No. DPR-13 for San Onofre Nuclear Generating Station, Unit 1 (SONGS 1). This amendment application consists of Proposed Change No. (PCN) 261. PCN 261 is a request to revise Sections 2.C and 2.D of the Operating License.

Section 2.C will be revised to delete or modify some of the license conditions listed in it, as indicated below.

Condition (3) - - Spent Fuel Transshipment Modify Condition (4) - - Physical Protection. Modify Condition (5) - - Integrated Implementation Schedule Delete Condition (6) - - Cycle 11 Thermal Shield Monitoring Program Delete Condition (7) - - Plant Modification to Eliminate Single Failure Delete Susceptibility of Vital Bus Automatic Transfer Function Condition (8) - - Confirmatory Order dated January 2, 1990 Delete

Section 2.D will be revised to make license condition (9), Fire Protection, of Section 2.C exempt from the reporting requirements of Section 2.D.

Reporting of fire protection deficiencies is adequately covered in 10CFR50.72 and 50.73.

Regarding condition (3) above, a clarification is necessary. Condition (3) authorizes SCE to transship spent fuel from SONGS 1 to SONGS 2 and 3 in

accordance with our previous commitments concerning the transshipment method. Condition (3) also permits SCE to make changes in the transshipment method if these changes do not involve an unreviewed safety question. Additionally, condition (3) restricts the operation of the turbine building gantry crane to fuel transshipment only (due to past concerns associated with heavy load drop incidents over safety related-equipment). By the referenced letter, the NRC approved the Permanently Defueled Technical Specifications (PDTS) for SONGS 1. With the implementation of the PDTS, there is no safety-related equipment in the turbine building. In this PCN we are requesting removal of the restrictions on use of the gantry crane so that it will be possible to use this equipment for purposes other than transshipment. After this request has been approved, we intend to remove any other restrictions on operation of the gantry crane due to past commitments, provided this will not involve an unreviewed safety question. These actions are fully consistent with the requirements of condition (3), as proposed in this PCN.

The requested changes are consistent with the status of SONGS 1 as a permanently shutdown and defueled plant. These changes involve no significant hazards considerations, as demonstrated in the enclosed analysis of PCN 261.

If you have any questions regarding this amendment application or desire further information, please contact me.

200\PCN261.AA2

cc: L. J. Callan, Regional Administrator, NRC Region IV

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