Southern California Edison Company

23 PARKER STREET IRVINE, CALIFORNIA 92718

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WALTER C. MARSH MANAGER OF NUCLEAR REGULATORY AFFAIRS TELEPHONE (714) 454-4403

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

Gentlemen:

- Subject: Docket Nos. 50-361 and 50-362 Control Room Area San Onofre Nuclear Generating Station Units 2 and 3
- References: 1. November 10, 1994, letter from R. W. Krieger (Edison) to R. J. Callan (NRC), Subject: Docket Nos. 50-361 and 50-362, Shift Manning and Control Room Area, San Onofre Nuclear Generating Station, Units 2 and 3
 - November 18, 1994, letter from R. W. Krieger (Edison) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, 30-Day Report, Licensee Event Report No. 94-006, San Onofre Nuclear Generating Station, Units 2 and 3
 - January 3, 1995, letter from R. M. Rosenblum (Edison) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, Reply to a Notice of Violation, San Onofre Nuclear Generating Station, Units 2 and 3

The purpose of this letter is to inform the NRC of Southern California Edison's (Edison's) intention to implement a revised Control Room Area (see enclosure) when Proposed Change Number (PCN)-299 is approved by the NRC and implemented at San Onofre. PCN-299 relocates the Control Room Area (CRA) from the administrative section of the Units 2 and 3 Technical Specifications (TSs) to the Licensee Controlled Specifications (LCS) as permitted by NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." When implemented, the new CRA in the LCS will replace the existing TSs CRA.

Until the new CRA is implemented, Edison will continue to use the existing TSs CRA with additional administrative control as indicated in References 1, 2, and 3. This control includes clarifying the Control Room Command Function and placing a more restrictive limit on the allowable movement of the Senior Reactor Operator (SRO) holding the Control Room Command Function within the existing CRA.

Reference 1 also informed the NRC of Edison's continuing evaluation on the need for the SRO holding the Control Room Command function to check instrumentation in the adjacent hallways. The new CRA incorporates the results of this evaluation.

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The new CRA supports Position C.2.3 of Regulatory Guide (RG) 1.114, Revision 2, "Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit," which states "The senior operator should have the flexibility to periodically move for a brief period of time to other parts of the control room, as long as the senior operator is at all times within the control room vital area and either 1. in sight of or in the audible range of the reactor operator at the controls, or 2. in the audible range of the control room annunciators."

To ensure the new CRA supports the RG 1.114 Position C.2.3 requirement of "in the audible range of the reactor operator at the controls," we demonstrated that audible summons for the SRO with the Control Room Function could be heard in the Operations Support Office from the Unit 3 control room entrance.

If you have any questions regarding this matter, please let me know.

Very truly yours,

Hatte March

Enclosure

CC:

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

- A. B. Beach, Director, Division of Reactor Projects, Region IV
- K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
- J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3
- M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

Enclosure

Revised Control Room Area (CRA) San Onofre Units 2 and 3

