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October 18, 1995

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Toxic Gas Isolation System Temporary Outage Time
Proposed Technical Specification Change NPF-10/15-446,
Supplement 1
San Onofre Nuclear Generating Station
Units 2 and 3

Reference: August 1, 1995 letter from R. M. Rosenblum (Southern California Edison (Edison)) to Document Control Desk (NRC); Subject: Toxic Gas Isolation System Temporary Outage Time Proposed Technical Specification Change NPF-10/15-446

Enclosed is Supplement 1 to Amendment Application Numbers 147 and 131 to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station Units 2 and 3, respectively. These Amendment Applications, submitted to the NRC by the reference, consist of Proposed Technical Specification Change Number NPF-10/15-446 (PCN-446). PCN-446 is an amendment request to make a change to Technical Specification (TS) 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," Table 3.3-3. TS 3/4.3.2 includes the requirements for the minimum number of Toxic Gas Isolation System (TGIS) trains operable. The TSs governing the Control Room Emergency Air Cleanup System (the system actuated by TGIS) are not affected by this amendment request.

Supplement 1 to Amendment Application Numbers 147 and 131 adds provision of a "gas watch" should both trains of TGIS be out of service and the control room not isolated during replacement of TGIS instrumentation. Note that the plan is to replace existing TGIS instrumentation when either one train is operating or the control room is isolated. Therefore, the "gas watch" would only be used as a contingency. The supplement also removes reference to the probabilistic risk assessment performed for the original amendment request. This information has been removed because an assumption used in the assessment has since been found to be incorrect, thus possibly invalidating the numeric results of the assessment. Edison believes that the addition of the "gas watch" makes the original probabilistic risk assessment unnecessary and a revision of the assessment is not planned. Changes made to the original amendment request are highlighted and marked with bars in the right margin of

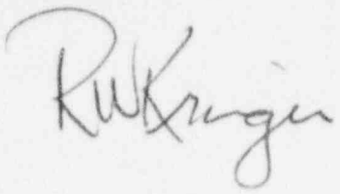
the enclosure. Other than these changes, all aspects of Amendment Application Numbers 147 and 131 remain unchanged.

Because of the need for TGIS instrumentation replacement, Edison requests NRC approval of Amendment Application Numbers 147 and 131 by November 1, 1995.

Edison requests Amendment Application Numbers 147 and 131 be issued effective as of its date of issuance, to be implemented within 30 days from the date of issuance. This will provide adequate time for the necessary procedure changes and training on the new Technical Specifications.

If you have any questions regarding this supplement, please contact me.

Sincerely,



Enclosures

cc: L. J. Callan, Regional Administrator, NRC Region IV
J. E. Dyer, Director, Division of Reactor Projects, NRC 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
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