April 16, 1983

Note to Joseph Scinto:

I am unable to concur in the attached San Onofre Unit 2 license amendment. This package was previously reviewed and returned without our concurrence because the Federal Register notice did not adequately describe the action being approved which involves a multitude of changes to the Unit 2 Tech Specs to conform them with the Unit 3 Tech Specs, and because the safety evaluation did not support the "no significant hazards consideration" finding made in the notice with respect to each of the changes made to the Tech Specs.

In regard to the latter concern, the prior safety evaluation, with few exceptions, merely stated that the change authorized the same provision which was found acceptable for Unit 3 and was, therefore, acceptable for Unit 2. While such finding may be sufficient insofar as the "safety" of the change is concerned, it does not explain why, for Unit 2, the change does not involve a significant hazards consideration.

Both of the above matters were discussed with the Project Manager when the package was returned. The result of this discussion is the present version which has no improvement in the Federal Register notice and, in fact, is supported by a less acceptable safety evaluation. The Project Manager advises that, in spite of my comments, the package, in its present form, is wholly consistent with the way in which such wholesale changes have been authorized for other facilities which have been concurred in by OELD.

Lawrence J. Chandler

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2