



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONALSM Company

Dwight E. Nunn
Vice President

September 22, 1998

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Proposed Technical Specification Change Number NPF-10/15-500
Reactor Trip Operating Bypass Removal Process Variable
San Onofre Nuclear Generating Station (SONGS) Units 2 and 3

Enclosed are Amendment Application Number 181 to Facility Operating License NPF-10, and Amendment Application Number 167 to Facility operating License NPF-15, for the San Onofre Nuclear Generations Station, Units 2 and 3, respectively. The Amendment Applications consist of Proposed Technical Specification Change Number (PCN)-500. This is a request for an emergency Technical Specification Change to support the resumption of operation of SONGS Unit 2 from its current unscheduled outage. A return to MODE 2, Startup, is currently expected on September 27, 1998.

PCN-500 is a request to revise Technical Specification (TS) 3.1, "Reactor Protective System (RPS) Instrumentation - Operating." Specifically, the Proposed Change replaces the input process variable for the Logarithmic Power Level -- High (log power) reactor trip operating bypass removal bistable, and the Reactor Coolant Flow - Low, the Local Power Density - High, and the Departure From Nucleate Boiling Ratio - Low (RCS Flow/LPD/DNBR) reactor trip operating bypass removal bistables. Currently the input process variable is identified as "THERMAL POWER," a parameter which includes both fission power and decay heat. The Proposed Change replaces "THERMAL POWER" with "logarithmic power," a parameter which includes primarily fission power. These changes are proposed for Notes (a) and (d) in TS Table 3.3.1-1, "Reactor Protective System Instrumentation."

Southern California Edison (SCE) requests that these amendments be issued as an emergency TS change, pursuant to 10CFR50.91(a)(5), effective as of the date of issuance. The emergency circumstances for this Proposed Change exist because Unit 2 is currently in an unscheduled outage to repair a leaking steam generator tube. Approval of the Proposed Change on an emergency basis would permit resumption of operation of Unit 2.

9809300198 980922
PDR ADOCK 05000361
P PDR

P. O. Box 128
San Clemente, CA 92674-0128
949-368-1480
Fax 949-368-1490

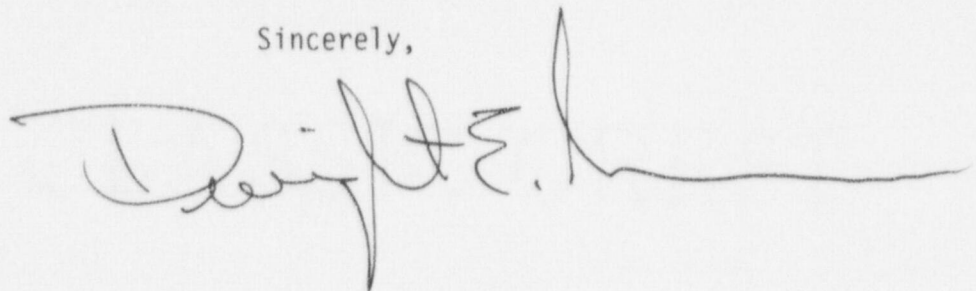
1/1
A001

The present TS wording prevents a return to power, for the reason given in the enclosure. This condition has existed since the TS for Unit 2 were originally issued 19 years ago. The condition was not appreciated until SCE engineers reviewed the setpoints for the log power and RCS Flow/LPD/DNBR operating bypass removals on September 21, 1998. Therefore, the current emergency situation could not have been avoided.

Although the same restraint does not currently exist on Unit 3, the same change also applies to that Unit, and is accordingly requested.

If you would like additional information regarding this Proposed Technical Specification Change, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dwight E. Hsu". The signature is written in black ink and is positioned below the word "Sincerely,".

Enclosure

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3
J. W. Clifford, NRC Project Manager, San Onofre Units 2 and 3
S. Y. Hsu, Department of Health Services, Radiologic Health Branch