



SOUTHERN CALIFORNIA
EDISON

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A. Edward Scherer
Manager of
Nuclear Regulatory Affairs

May 24, 1999

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Southern California Edison's Response to the NRC's Request for
Additional Information on Diesel Generator Surveillance
Requirements (TAC Nos. MA0240 and MA0241)
San Onofre Nuclear Generating Station Units 2 and 3

- References: 1) Letter from James W. Clifford (NRC) to Harold B. Ray (SCE), dated March 26, 1999, Subject: Request for Additional Information on Diesel Generator Surveillance Requirements (TAC Nos. MA0240 and MA0241)
- 2) Letter from Dwight E. Nunn (SCE) to the Document Control Desk (NRC), dated June 18, 1997; Subject: Docket Nos. 50-361 and 50-362, Diesel Generator Testing, Proposed Technical Specification Change Number NPF-10/15-478, San Onofre Nuclear Generating Station, Units 2 and 3

This letter is Southern California Edison's (SCE's) response to Reference 1 in which the Nuclear Regulatory Commission (NRC) requested clarifying information be added to the Bases of Technical Specification 3.8. Subsequent to that request, on April 27, 1999, there was a telephone discussion between our respective staffs which helped clarify the NRC's request. As a result of that understanding, SCE proposes adding the following sentence to the Technical Specification Bases for Surveillance Requirements 3.8.1.7, 3.8.1.12, and 3.8.1.15:

"In addition to the SR requirements, the time for the DG to reach steady state operation, unless the modified DG start method is employed, is periodically monitored and is evaluated to identify degradation of governor and voltage regulator performance."

It is our understanding that this change is responsive to the NRC's request in Reference 1.

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PDR ADOCK 05000361
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P. O. Box 128
San Clemente, CA 92674-0128
949-368-7501
Fax 949-368-7575

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Revised Technical Specification change pages and Bases pages reflecting this change are enclosed. Please note that footnotes to Unit 2 Surveillance Requirement Bases 3.8.1.3, 3.8.1.11, and 3.8.1.14 are no longer applicable. Therefore, those footnotes were deleted from the enclosed pages.

If you have any questions or need additional information regarding this matter, please feel free to contact me or Jack Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in dark ink, appearing to read "E. W. Merschoff", is centered below the "Sincerely," text.

Enclosure

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
L. Raghavan NRC Project Manager, San Onofre Units 2 and 3