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March 3, 1993

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NUCLEAR REGULATORY AFFAIRS

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

Gentlemen:

Subject: **Docket No. 50-206**
Implementation Schedule for Operation and Surveillance
Requirements for the Permanently Defueled Condition,
San Onofre Nuclear Generating Station, Unit 1

Reference: Letter, R. M. Rosenblum (SCE) to Document Control Desk (NRC),
"Operation and Surveillance Requirements for Permanently Defueled
Condition for San Onofre Nuclear Generating Station, Unit 1,"
September 21, 1992.

This letter provides clarifying information regarding our schedule for implementing the San Onofre, Unit 1 (SONGS 1) operation and surveillance requirements that were described in the reference letter for the permanently defueled condition. The referenced letter discussed our plans for maintaining SONGS 1 in accordance with existing Technical Specification requirements until Permanently Defueled Technical Specifications (PDTs) are approved by the NRC. That letter also described additional administrative controls that are being implemented to ensure adequate cooling of the spent fuel pool (SFP) during the defueled condition.

Our schedule for implementing the operation and surveillance requirements for the permanently defueled condition is as follows:

1. All existing Technical Specification requirements that are applicable to the defueled condition will remain in force until the PDTs are in place. With the exception noted in Item 2 below, the plant configuration changes and associated Technical Specification clarifications that are described in Enclosures 1 and 2 of the referenced letter are scheduled for implementation during approximately the first 90 days of the defueled condition.
2. The Foam Suppression System will remain operable in accordance with Technical Specifications 3.14.3 and 4.15.3 as long as oil is in the turbine generator lube oil reservoir and conditioner. Oil may remain in the system for a limited time during the defueled condition. We are evaluating the possibility of using the turbine generator as a synchronous condenser in the future. This option is being evaluated as a means of maintaining the reliability of the San Diego Gas and Electric power grid.

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3. The administrative controls concerning SFP temperature, cooling, and makeup water sources which are described in the body of the referenced letter will be in place immediately upon completion of the reactor defueling (currently scheduled for March 7, 1993).

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

Very truly yours,



cc: J. B. Martin, Regional Administrator, NRC Region V
S. W. Brown, NRC Project Manager, San Onofre Unit 1
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3
R. F. Dudley, Jr., Section Chief, Non-Power, Decommissioning, and
Environmental Project, Directorate of Reactor Projects - 3, 4 and 5