

October 3, 2005

Mr. Harold B. Ray  
Executive Vice President  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 -  
ISSUANCE OF AMENDMENTS ON IMPLEMENTATION OF TECHNICAL  
SPECIFICATION TASK FORCE ITEMS RELATED TO CYCLE-SPECIFIC  
VALUES AND SHUTDOWN MARGIN (TAC NOS. MC6471 AND MC6472)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 200 to Facility Operating License No. NPF-10 and Amendment No. 191 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated March 24, 2005.

The amendments revise various TSs related to cycle-specific values and the shutdown margin, and are consistent with Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) Standard TS Change Travelers: TSTF-9-A, Revision 1, "Relocate value for shutdown margin to COLR;" TSTF-67-A, Revision 0, "Correction of Shutdown Margin Definition;" TSTF-142-A, Revision 0, "Increase the Completion Time When the Core Reactivity Balance is Not Within Limit;" and TSTF-150-A, Revision 0, "Replace DNBR Power Decrease Number with Reference to the COLR."

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

**/RA/**

Jack Donohew, Senior Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures: 1. Amendment No. 200 to NPF-10  
2. Amendment No. 191 to NPF-15  
3. Safety Evaluation

cc w/encls: See next page

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cc w/encls: See next page

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RidsOgcRp	TBoyce	KDesai	RidsNrrDlpmDpr
NSalgado	RidsRgn4MailCenter (TPruett)		RidsNrrDlpmLpdiv2
DCollins	JDonohew		

**TS/AMD.200: ML052800200 and TS/AMD.191: ML052800119**

**NRR-100**

**ACCESSION NO: ML052790595**

**PKG.: ML052790626**

**NRR-058**

OFFICE	PDIV-2/PM	PDIV-2/PM	PDIV-2/LA	IROB/SC	SRXB-A/SC	OGC	PDIV-2/SC(A)
NAME	JDonohew	BPham	LFeizollahi	TBoyce	JNakoski	MWoods	DCollins
DATE	8/25/05	08/23/05	8/25/05	8/2/05	7/14/05	8/11/05	10/3/05

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SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 200  
License No. NPF-10

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated March 24, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 200, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

**/RA/**

Daniel S. Collins, Acting Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: October 3, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 200

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

1.1-6  
3.1-1  
3.1-2  
3.1-3  
3.1-7  
3.1-8  
3.1-12  
3.1-14  
3.1-15  
3.1-16  
3.2-9  
5.0-26

INSERT

1.1-6  
3.1-1  
3.1-2  
3.1-3  
3.1-7  
3.1-8  
3.1-12  
3.1-14  
3.1-15  
3.1-16  
3.2-9  
5.0-26

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 191  
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee), dated March 24, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No.191, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

**/RA/**

Daniel S. Collins, Acting Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: October 3, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 191

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

1.1-6  
3.1-1  
3.1-2  
3.1-3  
3.1-7  
3.1-8  
3.1-12  
3.1-14  
3.1-15  
3.1-16  
3.2-9  
5.0-26

INSERT

1.1-6  
3.1-1  
3.1-2  
3.1-3  
3.1-7  
3.1-8  
3.1-12  
3.1-14  
3.1-15  
3.1-16  
3.2-9  
5.0-26



SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 200 TO FACILITY OPERATING LICENSE NO. NPF-10  
AND AMENDMENT NO. 191 TO FACILITY OPERATING LICENSE NO. NPF-15  
SOUTHERN CALIFORNIA EDISON COMPANY  
SAN DIEGO GAS AND ELECTRIC COMPANY  
THE CITY OF RIVERSIDE, CALIFORNIA  
THE CITY OF ANAHEIM, CALIFORNIA  
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3  
DOCKET NOS. 50-361 AND 50-362

## 1.0 INTRODUCTION

By application to the Nuclear Regulatory Commission (NRC) dated March 24, 2005 (Agencywide Documents and Access Management System Accession No. ML050870535), Southern California Edison Company (SCE or the licensee), requested changes to the operating licenses for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3.

The proposed change would revise the following Technical Specifications (TSs):

- TS 1.1, Definitions, revise the definition of shutdown margin (SDM).
- TS 3.1.1, "SHUTDOWN MARGIN (SDM) -  $T_{avg} > 200$  EF," and TS 3.1.2, "SHUTDOWN MARGIN (SDM) -  $T_{avg} \# 200$  EF," relocate the numerical shutdown margin requirements to the Core Operating Limits Report (COLR).
- TS 3.1.3, "Reactivity Balance," increase the required action time from 72 hours to 7 days when the "Core reactivity balance not within limit."
- TS 3.1.5, "Control Element Assembly (CEA) Alignment," TS 3.1.6, "Shutdown Control Element Assembly (CEA) Insertion Limits," and TS 3.1.7, "Regulating CEA Insertion Limits," remove the requirement to verify SDM.
- TS 3.2.4, "Departure From Nucleate Boiling Ratio (DNBR)," relocate to the COLR the power margin that must be accommodated when the Core Operating Limit Supervisory System (COLSS) is in service and neither CEA calculator is operable.

- TS 5.7.1.5, "CORE OPERATING LIMITS REPORT (COLR)," identify that the limits for TSs 3.1.1 and 3.1.2 shall be in the COLR.

## 2.0 REGULATORY EVALUATION

The Commission's regulatory requirements related to the TS contents are set forth in Section 50.36 of Part 50 to Title 10 of the *Code of Federal Regulations* (i.e., 10 CFR 50.36) that assures the TS-specified LCOs are consistent with assumed values of the initial conditions in the licensee's safety analyses. In accordance with the 10 CFR 50.36 requirements, the NRC staff and the Combustion Engineering (CE) Owner's groups developed improved standard technical specifications that meet 10 CFR 50.36(c)(2)(ii) and 10 CFR 50.36(c)(3) requirements. The licensee is using guidance from the staff approved NUREG-1432, Revision 3, "Standard Technical Specifications for Combustion Engineering Plants." The licensee conforms to the guidance in NRC Generic Letter (GL) 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications," and the following NRC-approved Technical Specification Task Force (TSTF) Travelers: TSTF-9-A, Revision 1, "Relocate Value for Shutdown Margin to COLR," TSTF-67-A, Revision 0, "Correction of Shutdown Margin Definition," TSTF-142-A, Revision 0, "Increase the Completion Time When the Core Reactivity Balance is Not Within Limit," and TSTF-150-A, Revision 0, "Replace DNBR Power Decrease Number with Reference to the COLR."

## 3.0 TECHNICAL EVALUATION

NRC GL 88-16 allows licensees to relocate cycle-specific parameters from the TSs to the COLR provided that the values are determined using an NRC-approved methodology that is referenced in TS 5.7, Reporting Requirement. GL 88-16 allows for relocation of parameters including moderator temperature coefficient, shutdown bank insertion limits, control bank insertion limits, axial flux difference limits, nuclear heat flux hot channel factor limit, nuclear enthalpy rise hot channel factor limit, refueling boron concentration limit, and shutdown margin. Based on this information and other NRC-approved TSTFs, the NRC staff evaluated the licensee's proposed TS changes as follows:

### 3.1 TS 1.1 Definitions - SHUTDOWN MARGIN (SDM)

The current definition of SDM, item b, is incorrect and will be deleted. Item b of this definition states, "In Modes 1 and 2, the fuel and moderator temperatures are changed to the corrected hot zero power condition." Under the CE core-design methodology, the changes in fuel and moderator temperature are included in the determination of the Control Element Assembly (CEA) Power Dependent Insertion Limits (PDIL) that are used to ensure adequate shutdown margin in Modes 1 and 2. Paragraph "a" of this definition describes the requirements for CEAs.

The last sentence at the end of the SDM definition, "With any CEAs not capable of being fully inserted, the reactivity worth of these CEAs must be accounted for in the determination of SDM," will be relocated to the end of paragraph "a."

Because this proposed TS change is correcting the TS definition of SDM and is consistent with TSTF-67-A, Revision 0, the NRC staff concludes that it meets 10 CFR 50.36 and is, therefore, acceptable.

3.2 TS 3.1.1 SHUTDOWN MARGIN (SDM) -  $T_{avg} > 200$  EF  
TS 3.1.2 SHUTDOWN MARGIN (SDM) -  $T_{avg} \# 200$  EF

The licensee will revise LCO 3.1.1 from, "SDM shall be  $\$ 5.15\% \Delta k/k$ ," to "SDM shall be within the limits specified in COLR."

Similarly, Surveillance Requirement (SR) 3.1.1.2 will be revised from, "verify SDM is  $\$ 5.15\% \Delta k/k$ ," to "Verify SDM shall be within the limits specified in COLR."

The licensee will revise the LCO 3.1.2 from, "SDM shall be  $\$ 3.0\% \Delta k/k$ ," to "SDM shall be within the limits specified in the COLR."

Similarly, SR 3.1.2.1 will be revised from, "Verify SDM is  $\$ 3.0\% \Delta k/k$ ," to "Verify SDM to be within the limits specified in the COLR."

The SDM is a cycle-specific variable similar to other core physics parameters that are contained in the COLR. Also, the licensee is using an NRC-approved methodology for calculating the SDM that is in SCE-9801-P-A, "Reload Analysis Methodology for the San Onofre Nuclear Generating Station Units 2 and 3." This is document No. 6.a that is listed in TS 5.7.1.5.b as an NRC-approved analytical method to determine core operating limits, which in this case is the SDM. Relocating the SDM to the COLR will provide core design and operational flexibility to the licensee that can be used to improve fuel management and to solve plant-specific issues without requiring prior NRC review and approval. The proposed TS changes are consistent with GL 88-16 and TSTF-9-A, Revision 1, and has its NRC-approved methodology listed in TS 5.7.1.5.b. Based on this, the NRC staff concludes the proposed changes meet 10 CFR 50.36 and are, therefore, acceptable.

3.3 TS 3.1.3 Reactivity Balance

The licensee will increase the completion times for Required Actions A.1 and A.2 from 72 hours to 7 days.

The actions require a reevaluation of the core design and safety analysis to determine if the reactor core is acceptable for continued operation. Further, the existing TSs require the establishment of appropriate operating restrictions and surveillance requirements (SRs) within 72 hours. Predicted versus measured reactivity anomaly evaluation is a very complex task. It requires the licensee to gather necessary operating data, effective transmittal of the data to the core-design organization, evaluation by a fuel vendor, and the development and implementation of appropriate controls and SRs based on the cycle-specific operating data. Experience has shown that the 72 hours allowed by existing TS requirements may not be reasonable to complete this complex task. The proposed 7-day period provides sufficient time to analyze the cycle-specific operating data and, develop and implement appropriate controls.

The proposed TS change is consistent with TSTF-142-A, Revision 0, and is acceptable to the NRC staff because of the (1) conservatisms used in designing the reactor core and performing the safety analyses and (2) low probability of a design-basis accident or anticipated transient approaching the core-design limits during the 7-day period. Based on this, the NRC staff concludes that the proposed change to increase the completion time to 7 days meets 10 CFR 50.36 and is, therefore, acceptable.

3.4 TS 3.1.5 Control Element Assembly (CEA) Alignment  
TS 3.1.6 Shutdown CEA Insertion Limits  
TS 3.1.7 Regulating CEA Insertion Limits

The licensee will remove SDM and boron-initiation requirements from TS 3.1.5, Required Actions A.2.1 and A.2.2 and replace them with, "Restore the misaligned CEA(s) to within 7 inches of its group." Similarly, Required Actions B.2.1 and B.2.2 will be replaced with, "Restore the misaligned (CEA)(s) to within 7 inches of its group."

The licensee will remove SDM and boron-initiation requirements from TS 3.1.6, "Required Action A.1.1 and A.1.2 and replace them with, "Restore Shutdown (CEA)(s) to within limit."

The licensee will remove SDM and boron-initiation requirements from TS 3.1.7, "Required Action A.1.1 and A.1.2 and replace them with, "restore regulating CEA groups to within limits." Similarly, Required Actions D.1.1 and D.1.2 will be replaced with, "Restore regulating CEA groups to within limits."

Under the CE core-design methodology, the changes in fuel and moderator temperature are included in the determination of the CEA PDILs that are used to assure adequate SDM in CE plants in Modes 1 and 2. When CEAs are inoperable, calculating the SDM, as required in many TS-required action statements, is inappropriate for CE plants, including SONGS. If the CEAs are above the PDIL, there is an adequate SDM, otherwise, restoring the CEAs to within their limits will restore the SDM. Under the CE core-design methodology, boration is not an appropriate required action to restore the SDM. Therefore, these TS-required action statements have been proposed by the licensee to be removed from the TSs.

Because the proposed TS changes are inappropriate required actions for CE plants and are consistent with TSTF-67-A, Revision 0, the NRC staff concludes that they meet 10 CFR 50.36. Based on this, the NRC staff further concludes that the TS changes are acceptable.

3.5 TS 3.2.4 Departure From Nucleate Boiling Ratio (DNBR)

The licensee will relocate the power margin to the COLR when the COLSS is in service and neither CEA calculator is operable.

LCO 3.2.4, paragraph b, requires that the COLSS core power operating limit based on DNBR be decreased by 13 percent rated thermal power when COLSS is in service and neither CEA calculator is operable. The decrease in the power operating limit based on DNBR is a cycle-specific value and it is appropriate to relocate this value to the COLR. The LCO and COLR will continue to assure that the appropriate COLSS penalty value is maintained during plant operation. Appropriate analyses will continue to be performed in accordance with the NRC-approved SONGS reload methodology to assure that all design-basis events have acceptable results. The licensee stated that the NRC-approved methodology used to calculate the DNBR is also SCE-9801-P-A. This is document No. 6.a that is listed in TS 5.7.1.5.b as an NRC-approved analytical method to determine core operating limits, which in this case is the DNBR.

Because the proposed TS change meets the GL 88-16 requirement, has its NRC-approved methodology listed in TS 5.7.1.5.b, and is consistent with TSTF-150-A, Revision 0, the NRC

staff concludes that the proposed TS change meets 10 CFR 50.36. Based on this, the NRC staff further concludes that the TS changes are acceptable.

### 3.6 TS 5.7.1.5 Core Operating Limits Report (COLR)

The licensee will add references to TS 3.1.1 and TS 3.1.2 in TS 5.7.1.5. The proposed change is editorial in nature and is required to allow the licensee to specify the SDM limits outside the TSs. TS 5.7.1.5.b specifies the NRC-approved methodology (document No. 6.a) that is required to be used to calculate the SDM limits to be in the COLR document. Based on this, the NRC staff concludes that the proposed change meets 10 CFR 50.36 and is, therefore, acceptable.

In its application for this amendment, the licensee identified a change to TS 5.7.1.5.b in that the statement "Methodology for Specifications 3.1.1 and 3.1.2 for Shutdown Margin" was to be added following the listing of documents No. 6.a through 6.c. This statement was proposed to identify that, as stated in the application, document 6.a provides the NRC-approved analytical methods to determine the SDM. However, in Amendment Nos. 197 and 188, for Units 2 and 3, respectively, which were approved in the NRC letter dated July 19, 2005, TS 5.7.1.5.b was revised such that similar statements were removed from the TSs. Therefore, based on Amendment Nos. 197 and 188, this statement is not being added to the TS 5.7.1.5.b for the SDM.

## 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendments. The State official had no comments.

## 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding published May 10, 2005 (70 FR 24656). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the

Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: K. Desai  
J. Donohew

Date: October 3, 2005

San Onofre Nuclear Generating Station  
Units 2 and 3

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