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AUTH. NAME AUTHOR AFFILIATION
 MEDFORD, M.O. Southern California Edison Co.
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SUBJECT: Responds to NRC 880413 request for addl info re proposed changes to Tech Specs.

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Southern California Edison Company

P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

M. O. MEDFORD
MANAGER OF NUCLEAR ENGINEERING
AND LICENSING

TELEPHONE
(818) 302-1749

June 21, 1988

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

Gentlemen:

Subject: Response to NRC Request for Additional Information
Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station Units 2 and 3

By letter dated April 13, 1988, the NRC requested additional information relating to two proposed changes to the San Onofre Nuclear Generating Station Units 2 and 3 Technical Specifications. The proposed changes, PCN-238 and PCN-233, were submitted by SCE's letters dated February 22, 1988 and December 14, 1987.

PCN-238 proposed revisions to Technical Specifications 3.0 and 4.0 and associated bases sections to implement the guidance of NRC Generic Letter 87-09. While this proposed change generally conforms to Generic Letter 87-09, the proposed bases for Specifications 3.0.1 and 3.0.3 omitted a sentence included in the Generic Letter which indicates that the shutdown action requirements are not intended to be used as an operational convenience to permit (routine) voluntary removal of a system(s) or component(s) from service in lieu of alternatives that would not result in redundant systems or components being inoperable. SCE understands that the purpose of this statement was to indicate Specification 3.0.3 was not intended to accommodate routine evolutions such as maintenance and surveillance testing. SCE is currently aware of no such circumstances in the Units 2 and 3 Technical Specifications where Specification 3.0.3 is relied on for the performance of routine evolutions. Accordingly, SCE requests that the omitted statements from Generic Letter 87-09 be added to the Bases for Specifications 3.0.1 and 3.0.3 when PCN-238 is approved.

PCN-233 requested revisions to Specifications 3/4.10.2, "Group Height, Insertion and Power Distribution Limits," and Tables 2.2-1 and 3.3-1. The proposed change included the addition of an exemption to Specification 3.0.4 to Action 6 of Table 3.3-1 which applies when one or both Control Element Assembly Calculators are out of service. This change would allow plant startup with one or both CEACs out of service while relying on the provisions of Action 6. PCN-238 would revise Specification 3.0.4 plant startup while

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relying on Action statements which allow plant operation to continue indefinitely. Since Action 6 allows plant operation to continue indefinitely, the proposed revision of Specification 3.0.4 included in PCN-238, has the same result as the 3.0.4 exemption for Action 6 proposed by PCN-233. Therefore, the 3.0.4 exemption for Action 6 proposed by PCN-233 is unnecessary if PCN-238 is approved. However, as it is likely that PCN-233 will be approved before PCN-238, SCE requests that the 3.0.4 exemption be approved with PCN-233.

Should you have any questions regarding this information, please call me.

Very truly yours,



cc: J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3