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SUBJECT: Forwards revised Tech Spec 3.3.3.7, "Fire Detection Instrumentation."

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December 7, 1988

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
San Onofre Nuclear Generating Station  
Units 2 and 3  
Revision to PCN NPF-10/15-243  
(TAC Nos. 54814 and 54815)

By letter dated May 6, 1988, Southern California Edison Company (SCE) submitted to the Nuclear Regulatory Commission (NRC) Amendment Application No. 39 to Facility Operating License NPF-10 and Amendment Application No. 25 to Facility Operating License NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. Amendment Application No. 39 for Unit 2 and No. 25 for Unit 3 consisted of proposed changes NPF-10/15-243 and NPF-10/15-244. Proposed Change NPF-10/15-243 contained changes to the Units 2 and 3 Fire Protection Technical Specifications; Proposed Change NPF-10/15-244 contained changes to the Units 2 and 3 Fire Protection License Conditions.

By letter dated September 2, 1988, SCE transmitted Revision 4 of the Updated Fire Hazards Analysis (UFHA). This annual revision to the UFHA incorporated the results of a reassessment of San Onofre Units 2 and 3 relative to the requirements of 10 CFR 50, Appendix R, Sections III.G, III.J, III.L and III.O, including deviations thereto approved in the NRC's Safety Evaluation dated June 29, 1988. The Appendix R reassessment resulted in a revised safe shutdown analysis and identification of associated circuits of concern in light of NRC guidance provided in Generic Letter 86-10.

SCE recently completed a comparison of the UFHA, Revision 4 and the proposed Fire Protection Technical Specifications (PCN-10/15-243). As a result, SCE identified additional fire areas to be added to the list of detectors in Table 3.3-11 of proposed Technical Specification 3.3.3.7. The revisions to Table 3.3-11 are provided as markups to proposed Technical Specification 3.3.3.7 contained in PCN-10/15-243 in Enclosure 1. Minor typographical errors were also identified in the fire suppression system identifiers for proposed Technical Specification 3.7.8.2; the appropriate changes are provided as

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markups to the affected pages of proposed Technical Specification 3.7.8.2, which are contained in Enclosure 2. These changes to PCN-10/15-243 do not represent a decrease in the level of fire protection as defined in the Units 2 and 3 Technical Specifications and the approved Fire Protection Program and, therefore, do not change the safety analysis included in PCN-10/15-243.

If you have any questions regarding this matter, please call me.

Very truly yours,



Enclosure

cc: D. E. Hickman, NRC Project Manager, San Onofre Units 2 and 3  
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