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SUBJECT: Forwards revs to PCN-238,per discussions w/NRC staff.

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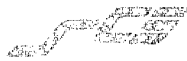
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October 19, 1989

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Revisions to Proposed Change Number (PCN) 238
TAC Nos. 66824 and 66825
San Onofre Nuclear Generating Station
Units 2 and 3

This letter forwards revisions to PCN-238 that were agreed upon in discussions with the NRC staff. On December 22, 1987, Southern California Edison (SCE) submitted PCN-238, a request to revise Technical Specifications 3.0.4, 4.0.3, 4.0.4, and twenty-five other technical specifications for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3.

Sections 3.0 and 4.0 of the Technical Specifications provide the general requirements on the applicability of Limiting Conditions for Operation (LCO) and Surveillance Requirements. Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," recommended changes to these sections to correct three specific standard technical specification problems.

The amendment requests in PCN-238 were consistent with GL 87-09's recommendations. In subsequent discussions however, the NRC staff indicated that the recommended GL 87-09 changes to 3.0.4 could permit new exceptions to 3.0.4 that did not exist before, and would require additional plant specific justification. Therefore, consistent with our discussions with the NRC, SCE is withdrawing those portions of PCN-238 that would revise Specification 3.0.4 and the technical specification revisions that would delete the explicit exceptions to 3.0.4. The proposed changes to Technical Specifications 4.0.3, 4.0.4, and a revised Bases for 3.0 and 4.0 have been retained.

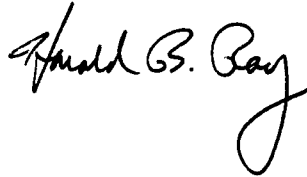
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October 19, 1989

Therefore, please replace the proposed Technical Specifications in Attachments C and D of PCN-238 in their entirety with the enclosed revised proposed Technical Specifications and Bases. If you have any question regarding these revisions, please call me.

Very truly yours,



Enclosures

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