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SUBJECT: Forwards Amend Application 89 to License NPF-10,consisting
 of Proposed Tech Spec Change NPF-10-313.

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Southern California Edison Company

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HAROLD B. RAY
VICE PRESIDENT

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January 3, 1990

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

Gentlemen:

Subject: Docket No. 50-361
Amendment Application No. 89
San Onofre Nuclear Generating Station
Unit 2

Enclosed is Amendment Application No. 89 to Facility Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2. This Amendment Application consists of Proposed Technical Specification Change NPF-10-313 (PCN-313). PCN-313 is a request to revise Technical Specification 3/4.7.6, "Snubbers". The proposed change would, on a one time basis, waive a reduced snubber visual inspection interval (124 days \pm 25%) caused by previous inspection results, and extend the maximum inspection period from 18 months \pm 25% to 20 months \pm 25% for inaccessible snubbers. The 124 day \pm 25% schedule is based on 4 snubbers having failed visual inspection during the last surveillance cycle.

The Southern California Edison Company (SCE) is seeking this one time extension because San Onofre Unit 2 cannot complete the current extended fuel cycle (Cycle 5) of operation (nominal 24 months) without exceeding the Technical Specification allowable visual surveillance period. In accordance with the surveillance requirements, the reduced inspection interval would require multiple shutdowns prior to the next refueling outage to visually inspect inaccessible snubbers. Performance of these snubber inspections with the unit at power would be impractical because the equipment is operating, located in high radiation zones, and ladders or scaffolding would need to be erected for inspection. Radiation ALARA goals would be difficult or impossible to maintain. Shutting the Unit down to perform the inspections would be very costly while the affect on safety of extending the inspection interval is minimal.

SCE believes that waiving the reduced inspection period will be acceptable because the failures that the interval are based on were caused by a known problem that has been remedied for both the affected and generically susceptible snubbers. The visual inspection surveillance was completed

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January 3, 1990

on 11/13/89. Within the confines of a 155 day limit (124 days +25%), unit shutdown would have to occur by 3/27/90 to complete the visual inspection on time. Your cooperation in approving this request in a timely manner is very much appreciated.

If you have any questions regarding this license amendment application, please call me.

Very truly yours,

A handwritten signature in cursive script, reading 'Harold B. Ray', is positioned below the typed name. The signature is written in dark ink and is clearly legible.

JFW/dm:snubbers.U2
Enclosures

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