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 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361  
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362  
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 BASKIN, K.P. Southern California Edison Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards applications for amend to Licenses NPF-10 & NPF-15,  
 revising Tech Spec 6.8.4.d to allow addl improvements to  
 post-accident sampling sys addl improvements.

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*w/ check : \$4,400*

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K. P. BASKIN

MANAGER OF NUCLEAR ENGINEERING,  
SAFETY, AND LICENSING

February 24, 1983

TELEPHONE  
(213) 572-1401

Mr. H.R. Denton  
Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
San Onofre Nuclear Generating Station  
Units 2 and 3

Enclosed are three executed and forty conformed copies of Amendment Application No. 19 to Operating License No. NPF-10 and Amendment Application No. 5 to Operating License No. NPF-15 for San Onofre Nuclear Generating Station. Amendment Application Nos. 19 and 5 consist of Proposed Change Nos. NPF-10-69 and NPF-15-69, respectively.

Proposed Change No. NPF-10-69 is a request to revise Section 2.C(19)i and Technical Specification 6.8.4.d of Operating License No. NPF-10. Likewise, Proposed Change No. NPF-15-69 is a request to revise Section 2.C(17)d and Technical Specification 6.8.4.d of Operating License No. NPF-15. Scheduler relief to September 1, 1983 is being requested for implementing the Post-Accident Sampling System(PASS) to allow for additional improvements to the system and procedures and to complete the training on the enhanced system.

In earlier correspondence with the NRC regarding the PASS, SCE stated the belief that the PASS was operational. This belief was based upon the substantial modifications and improvements that had been made to the PASS in the Fall of 1982. However, when Unit 2 returned to power in January, 1983, SCE had trouble demonstrating its operability. One reason for this is that leaks in the PASS continued to inhibit SCE's ability to successfully obtain samples. These problems have been corrected as they have been encountered. However, SCE was not able to satisfactorily demonstrate system operability on February 10, 1983 during an audit by NRC Region V. Problems encountered at that time are being corrected. Boo!

However, based on the history of difficulties in declaring the PASS operable and the fact that successful implementation of the sampling program is dependent on plant availability, SCE believes it is prudent to request an amendment to the operating licenses to allow substantial additional time to implement the requirements of the licenses. w/check: \$4400.00

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Mr. H.R. Denton

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February 24, 1983

One specific task that needs to be accomplished in the requested timeframe is the NRC certification of the transportation cask that SCE will use to ship PASS samples for offsite analysis. SCE expects that the application for NRC certification will be filed by the cask manufacturer before May 1, 1983 and NRC approval will be granted within the next two months. While this is believed to be a reasonable estimate for cask certification, it is recognized that factors beyond SCE control could influence the completion of this task.

It is respectfully requested that Amendment Application No. 19 (NPF-10) and Amendment Application No. 5 (NPF-15) be reviewed promptly and appropriate action taken. Direct distribution of these applications will be made in accordance with the service list provided by SCE's letter of August 2, 1982 to the Commission. An affidavit attesting to the fact that distribution has been completed will be submitted within ten days of amendment docketing.

The proposed change contained in Amendment Application No. 19 (NPF-10) is considered to constitute a Class III amendment based on the determination that this change involves a single issue that is deemed not to involve a significant hazards consideration. The proposed change contained in Amendment Application No. 5 (NPF-15) is a duplicate of Amendment Application No. 19 for a second essentially identical unit at the same site and thus is considered to constitute a Class I amendment. Accordingly, enclosed is Southern California Edison Company's check in the amount of \$4,400.00 as required by 10 CFR 170.22.

Very truly yours,

*M.D. Medford* for KPB

cc: R.H. Engelken - NRC Region V  
H. Rood (To be opened by addressee only)