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 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Requests concurrent review & approval of 830106 & 25  
 Proposed changes NPF-10-33 & NPF-15-33, respectively. Proposed  
 revised DNBR penalty factors partially restore operating  
 margin removed by current rod bow penalty factors.

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*Southern California Edison Company*



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MANAGER OF NUCLEAR ENGINEERING,  
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July 14, 1983

TELEPHONE  
(213) 572-1401

50-364

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. George W. Knighton, Branch Chief  
Licensing Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: San Onofre Nuclear Generating Station  
Units 2 and 3

Southern California Edison Company's (SCE) letter dated January 6, 1983 to the NRC submitted Amendment Application No. 16 to Facility Operating License NPF-10. Amendment Application No. 16 contained Proposed Change NPF-10-33. Proposed Change NPF-10-33 requested the revision of DNBR penalty factors contained in Specification 3.2.4 on the basis of NRC staff approval of Combustion Engineering Topical Report CENPD-225. The proposed change increases the available operating margin by decreasing the burnup dependent rod bow penalty factors.

Analysis of the results of the recently completed 80% calorimetric tests have shown that indicated RCS flow is lower than the value originally expected from hot functional test data. The effect of this is a reduction of the available operating margin above the minimum DNBR limit. Using the currently specified DNBR rod bow penalty factors, the available operating margin will be unacceptably reduced so as to infringe on full power operation when exposure for the maximum burnup assembly reaches approximately 7000 MWD/MTU. It is conservatively estimated that this burnup will be achieved by approximately November 1, 1983.

The revised DNBR penalty factors requested in Proposed Change NPF-10-33 restore part of the available operating margin which was removed by the current overly conservative rod bow penalty factors and avoids the above noted impact on full power operation. SCE therefore requests approval of Proposed Change NPF-10-33 prior to October 19, 1983. A corresponding Proposed Change for Unit 3, NPF-15-33, was submitted by SCE's letter dated January 25, 1983 to the NRC. SCE requests that Proposed Changes NPF-10-33 and NPF-15-33 be reviewed and approved concurrently.

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Mr. G. W. Knighton

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July 14, 1983

It is noted here, for clarification, that the constant EPOL2, referred to as an "addressable constant" in the proposed changes, is not now directly addressable, as is BERR1. EPOL2, is currently retrievable for verification, and administrative and software controls make the possibility of its inadvertant change more remote than changes to addressable constents.

Should you have any questions regarding the information contained in this letter, please call me.

Very truly yours,

*VP Baskin*

cc: Harry Rood, NRC (to be opened by addressee only)