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VICE PRESIDENT

November 6, 1995

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362
Amendment Application Nos. 152 and 136
Extension of the Allowed Outage Time
for Safety Injection Tanks
San Onofre Nuclear Generating Station
Units 2 and 3**

Reference: CEOG CE NPSD-994 "Joint Applications Report for Safety Injection
System Tank AOT/STI Extension," May 1995

Enclosed are Amendment Application Nos. 152 and 136 to Facility Operating
Licenses NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station
Units 2 and 3, respectively. These amendment applications consist of Proposed
Change Number (PCN)-451.

PCN-451 proposes to modify post PCN-299 (Technical Specification Improvement
Program) Technical Specification (TS) 3.5.1 to extend the Allowed Outage Time
(AOT) for a single inoperable Safety Injection Tank (SIT) from 1 hour to 24
hours. Additionally, PCN-451 proposes to extend the SIT AOT from 1 hour to 72
hours if a single SIT becomes inoperable due to malfunctioning water level
indication or nitrogen cover pressure indication or both.

This license amendment is a collaborative effort by participating Combustion
Engineering Owners Group (CEOG) members based on a review of plant operations,
deterministic and design basis considerations, and plant risk, as well as
previous generic studies and conclusions from the NRC staff in NUREG-1366,
"Improvements to Technical Specifications Surveillance Requirements," and
NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants."
The above reference, which was submitted to the NRC staff for review and
approval under separate cover, supports this change.

Edison requests this amendment be issued effective as of its date of issuance,
and be implemented within 30 days from the date of issuance. This will
provide adequate time for the necessary procedure changes and training on the
new Technical Specifications.

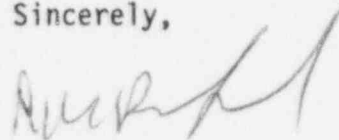
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This license amendment is expected to save in excess of \$100,000 over the remaining life of the San Onofre units from avoidance of a shutdown due to an overly restrictive TS AOT. For example, Licensee Event Report No. 88-022 reported that on August 21, 1988, a Unit 2 shutdown was initiated and an Unusual Event declared when the nitrogen cover pressure in one of the four SITs could not be restored and maintained within the one hour AOT. Since 1983, there have been four reported LCO 3.0.3 entries for Unit 2 and one entry reported for Unit 3 due to the inability to verify SIT water level and/or cover pressure. During this same period, Unit 3 had invoked LCO 3.5.1 Action "a" six times and in several instances approached the one hour AOT to return SIT water level and/or cover pressure to the prescribed limits. As such, this license amendment request is considered a Cost Beneficial Licensing Action (CBLA) due to the significant cost involved in shutting down the plant in addition to the potential for challenging the plant's safety systems.

If you would like additional information on this Technical Specification change request, please let me know.

Sincerely,



Enclosures

cc: L. J. Callan, Regional Administrator, NRC Region IV
J. E. Dyer, Director, Division of Reactor Projects, Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
H. Kocol, California Department of Health Services

ENCLOSURE (PCN-451)