



Southern California Edison Company

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November 8, 1995

RICHARD M. ROSENBLUM
VICE PRESIDENT

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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. 151 and 135
 Extension of Allowed Outage Time for
 Low Pressure Safety Injection Train
 San Onofre Nuclear Generating Station
 Units 2 and 3

Reference: CEOG CE NPSD-995, "Joint Applications Report for Low
 Pressure Safety Injection System AOT Extension," May 1995

Enclosed are Amendment Application Nos. 151 and 135 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)-452.

PCN-452 proposes to modify post PCN-299 (Technical Specification Improvement
Program) Specification (TS) 3.5.2 to extend the allowed outage time from 72
hours to 7 days for a single Low Pressure Safety Injection (LPSI) train. This
license amendment is a collaborative effort by participating Combustion
Engineering Owners Group (CEOG) members based on an integrated review and
assessment of plant operations, deterministic and design basis considerations,
and plant risk. The above reference, which was submitted to the NRC staff for
review and approval under separate cover, supports this change.

Southern California 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. 89-008 reported that on June 27, 1989, a Unit 3 shutdown was initiated and an Unusual Event declared when LPSI pump 3P015 mechanical seal replacement work could not be completed within the 72 hour AOT. 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. NRC approval is requested by the middle of August 1996 to permit use of this license amendment prior to the Unit 2 Cycle 9 refueling outage.

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-452)