



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONAL Company

Dwight E. Nunn
Vice President

May 29, 1996

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. 162 and 146
Proposed Change Number 465
Change to Technical Specification 3.5
"Emergency Core Cooling Systems (ECCS)"
San Onofre Nuclear Generating Station
Units 2 and 3

Enclosed are Amendment Application Numbers 162 and 146 to Facility Operating Licenses NPF-10 and NPF-15, respectively, for the San Onofre Nuclear Generating Station Units 2 and 3. These amendment applications consist of Proposed Change Number 465 (PCN-465). PCN 465 is a request to revise the Unit 2 Amendment No. 127 and Unit 3 Amendment No. 116 approved Technical Specification (TS) 3.5.1, "Safety Injection Tanks (SITs)."

Southern California Edison (Edison) is extending the operating cycle to approximately 590 effective full power days. To accomplish this cycle length extension, Edison is increasing the initial Uranium-235 fuel enrichment above 4.1 w/o up to 4.8 w/o and changing the burnable poison from B_4C to Erbium. Erbium is an Asia Brown Boveri Combustion Engineering term used to describe an Erbium-Oxide Er_2O_3 and fuel mixture.

Based on the completed analyses supporting the Cycle 9 core reload analysis, the only TS change needed to support the planned increased cycle length is to increase the minimum boron concentration in the safety injection tanks from 1850 parts per million (ppm) to 2200 ppm. No other TS change or TS Basis change is required. The Licensee Controlled Specifications for the Boric Acid Make-up tank boron concentration and the refueling minimum boron concentration will be changed via internal Edison procedures.

Edison believes this change in the SIT minimum boron concentration limit is, in essence, an administrative change. The SITs are filled from the refueling water storage tank (RWST), which has a technical specification minimum boron concentration requirement of 2350 ppm. Edison maintains the RWST boron concentration higher than the minimum limit, and, as a result, for the past several years the SIT boron concentration has been approximately 2500 ppm, even though the technical specification lower limit is 1850 ppm. Therefore, changing the SIT minimum boron concentration from 1850 ppm to 2200 ppm does not involve a physical change to the plant.

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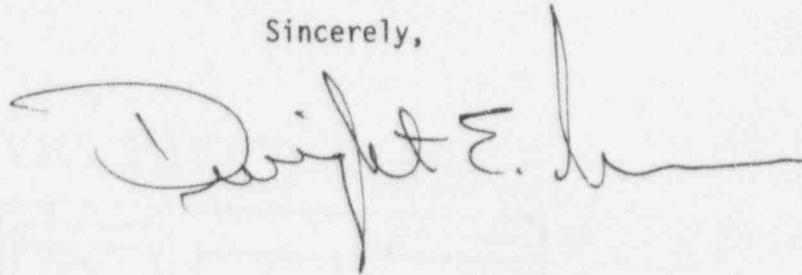
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The cycle extension will result in a cost savings to Edison, et al., due to extended cycle lengths and less fuel assemblies being changed out each refueling. This savings will exceed the minimum criteria of \$100,000 over the remaining life of the plant(s) established for a Cost Beneficial Licensing Action (CBLA) submittal. Therefore, these amendment applications are considered CBLAs.

Your approval of these amendment applications is requested by December 15, 1996, to support the San Onofre Unit 2 Cycle 9 refueling outage, which is anticipated to begin on November 30, 1996, and end on February 3, 1997. Edison requests approval of Amendment Application Numbers 162 and 146 to be effective as of the date of issuance, and to 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.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dwight E. L.", with a long horizontal flourish extending to the right.

Enclosure

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, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3