



SOUTHERN CALIFORNIA

**EDISON**

An EDISON INTERNATIONAL Company

4/15/97  
Dwight E. Nunn  
Vice President

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Proposed Technical Specification Change Number 483  
San Onofre Nuclear Generating Station  
Units 2 and 3

- References: (1) Letter, J. L. Rainsberry to U.S. Nuclear Regulatory Commission, Document Control Desk, Subject: "Diesel Generator Testing, San Onofre Nuclear Generating Station, Units 2 and 3," dated March 21, 1997
- (2) NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants (CEOG STS)", September, 1992

Enclosed are Amendment Application Numbers 167 and 153 to Facility Operating Licenses NPF-10 and NPF-15, respectively, for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The Amendment Applications consist of Proposed Technical Specification Change Number NPF-10/15-483 (PCN-483).

The proposed change is requested to revise Surveillance Requirement (SR) 3.8.1.8 and applicable Bases to Technical Specification (TS) 3.8.1, "AC Sources - Operating." This change will allow Edison to credit overlap testing for performance of SR 3.8.1.8. Overlap testing provides an equally valid test of the capability of the alternate offsite power source.

As mentioned in Reference 1 and prior correspondence on this issue, the change is based on a re-review of our implementation of Technical Specification Implementation Program (TSIP).

Southern California Edison Company requests this amendment be issued on an exigent basis effective as of its date of issuance. Issuance of this change on an exigent basis will permit the Unit 3 Unit Auxiliary Transformer to be credited as the alternate offsite power source for Unit 2, without either performing an actual transfer of the safety related buses while Unit 2 is operating or declaring the Unit 2 alternate offsite power source inoperable.

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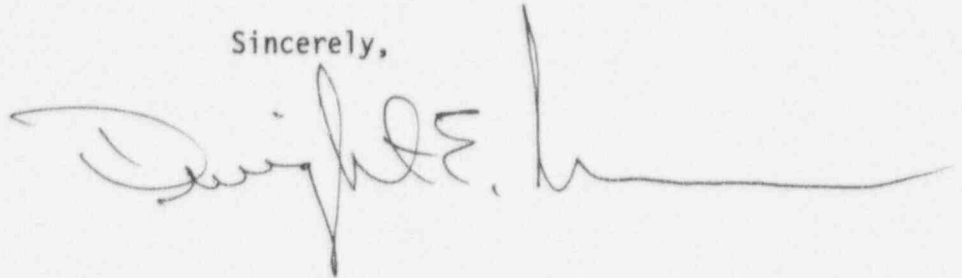


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This in turn will permit necessary preventive maintenance on the Unit 3 Reserve Auxiliary Transformers and associated hardware which is required during the current Unit 3 refueling outage.

If you would like additional information regarding this Amendment Application, please let me know.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dwight E. Perkins", followed by a long horizontal flourish.

Enclosure

cc: E. W. Merschoff, Regional Administrator, NRC 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