

May 6, 1997

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Core Thermal Power  
San Onofre Nuclear Generating Station  
Units 2 and 3

This letter is to ensure a mutual understanding between Southern California Edison (Edison) and the NRC for the full, steady-state, licensed power level operation of San Onofre Units 2 and 3. The "full, steady-state, licensed power level," License Condition 2.C(1) is the following:

"Southern California Edison Company (SCE) is authorized to operate the facility at reactor core power levels not in excess of full power (3390 megawatts thermal)."

In this regard, Edison's operating procedures are consistent with NRC Inspection Procedure 61706, "Core Thermal Power Evaluation," Section 03.02d., Inspection Requirement 02.01e, paragraphs 2 and 3 which states:

"Core thermal power evaluation is performed on a daily basis for both PWRs and BWRs. The specific requirements can be found in the plant's TS although the plant may follow more stringent guidelines as recommended by the manufacturer. Refer to Inspection Procedure 61705, "Calibration of Nuclear Instrumentation Systems," if calibration is required. In addition, the inspector should check that the average power level over any 8-hour shift did not exceed the "full steady-state licensed power level" (and similarly worded terms). The exact 8-hour periods defined as "shifts" are up to the plant, but should not be varied from day to day (the easiest definition is a normal shift manned by a particular "crew")."

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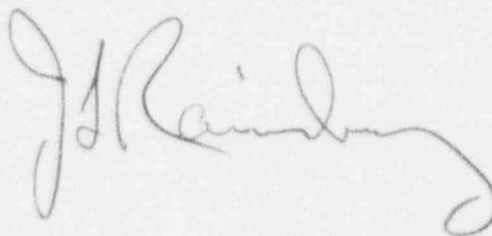
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"It is permissible to briefly exceed the "full, steady-state licensed power level" by as much as 2% for as long as 15 minutes. In no case should 102% power be exceeded, but lesser power "excursions" for longer periods should be allowed, with the above as guidance. For example, 1% excess for 30 minutes and 1/2% for 1 hour should be allowed. There are no limits on the number of times these "excursions" may occur, or the time interval that must separate such "excursions." The above requirement regarding the 8-hour average power will prevent abuse of this allowance."

Edison's procedures, with the above guidance, provide the plant operators explicit instructions for controlling plant power levels. This guidance requires that operators control steady state power to less than or equal to 100% Rated Thermal Power, but allows that thermal power may fluctuate slightly above 100% without operator action. The operating procedures require immediate corrective action to reduce thermal power when power is observed to be above 100%. Normal fluctuations are not outside the design basis and are not considered outside the licensing basis.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. L. Rainey".

cc: E. W. Merschhoff, 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