

July 27, 2001

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

Subject: **Docket Nos. 50-361 and 50-362**
Second Ten-Year Interval Inservice Inspection Program
Reactor Pressure Vessel Examinations
San Onofre Nuclear Generating Station Units 2 and 3

Gentlemen:

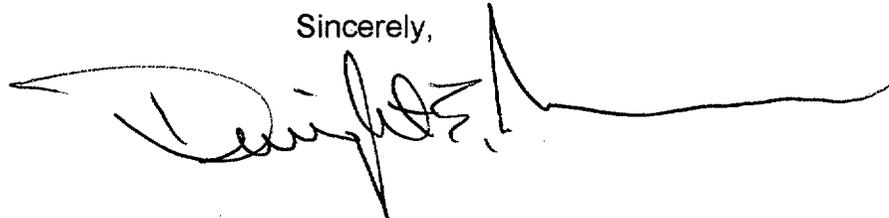
This letter requests NRC approval of Relief Request (RR) B-2-04 from the ASME Code requirements for the reactor pressure vessel (RPV) examinations for use at San Onofre Nuclear Generating Station Units 2 and 3.

The ASME Section XI Code requires ultrasonic examination of the RPV nozzle inside radius section. This relief request (RR B-2-04) will allow Southern California Edison (SCE) to perform a visual examination based on the ASME Code Case N-648 approved on December 8, 2000.

This relief request is needed to support the Unit 2 and Unit 3 Cycle 12 refueling outages, which are scheduled to begin in May 2002 and January 2003, respectively. To support planning activities for the reactor pressure vessel examinations that will be performed during the Cycle 12 refueling outages, your approval by January 1, 2002 would be greatly appreciated.

If you have any questions or need additional information regarding this matter, please feel free to contact me or Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,



Enclosures

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. E. Donoghue, NRC Project Manager, San Onofre Units 2, and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 & 3

**Enclosure
Relief Request
RR B-2-04**

San Onofre Nuclear Generating Station
Units 2 and 3
Second Ten-Year Interval
Inservice Inspection (ISI)
RELIEF REQUEST RR B-2-04

COMPONENT DESCRIPTION:

ASME Section XI, Class 1, Examination Category B-D, Item no. B3.100 Nozzle Inside Radius Section in Reactor Pressure Vessels examined at San Onofre Units 2 and 3.

EXAMINATION REQUIREMENTS:

Rules for Inservice Inspection of Nuclear Power Plant Components, Section XI, 1989 Edition, with no Addenda, Examination Category B-D Full Penetration Welds of Nozzles in Vessels, Code Item B3.100, Figure IWB-2500-7(a) through (d).

RELIEF REQUESTED:

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested to implement an alternative to the Volumetric (Ultrasonic, UT) examination requirement of ASME Section XI Table IWB-2500-1, Examination Category B-D, Item B3.100. Southern California Edison (SCE) proposes to perform a VT-1, Visual Examination, as specified in Reference 1, Code Case N-648 "Alternative Requirements for Inner Radius Examinations of Class 1 Reactor Vessel Nozzles, Section XI, Division 1." These examinations will be performed during the second inspection interval. This relief request is applicable to San Onofre Units 2 and 3.

BASIS FOR RELIEF:

The ASME Code Committee approved Code Case N-648, Reference 1, on December 8, 2000. This Code Case is provided as Attachment 1 to this Relief Request. According to an NRC memorandum (Reference 2), the staff indicated that an Ultrasonic (UT) examination could be replaced by VT-1 visual examination for the proposed Reactor Pressure Vessel nozzle inspections on the basis that surveillance is maintained and VT-1 visual examination is performed.

The implementation of this relief is also expected to reduce on-vessel examination time by as much as 10 hours, which translates to significant cost savings and reduced personnel radiation exposure.

ALTERNATIVE EXAMINATION:

In lieu of the Volumetric (Ultrasonic, UT) examination requirements of ASME Section XI Table IWB-2500-1, Examination Category B-D, Item no. B3.100, a VT-1 visual examination shall be performed as specified in Code Case N-648.

San Onofre Nuclear Generating Station
Units 2 and 3
Second Ten-Year Interval
Inservice Inspection (ISI)
RELIEF REQUEST RR B-2-04

IMPLEMENTATION SCHEDULE:

Second Inservice Inspection Interval

REFERENCES

- 1) Code Case N-648 "Alternative Requirements for Inner Radius Examinations of Class 1 Reactor Vessel Nozzles, Section XI, Division 1," Approved December 8, 2000.
- 2) NRC Internal Memorandum from K. R. Wichman (NRC) to W. H. Bateman (NRC) dated May 25, 2000; Subject: The Third Meeting with the Industry to Discuss the Elimination of RPV Nozzle Inner Radius Inspection (ML003718630).

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: December 8, 2000

See Numeric Index for expiration
and any reaffirmation dates.

Case N-648
Alternative Requirements for Inner Radius
Examinations of Class 1 Reactor Vessel Nozzles
Section XI, Division 1

Inquiry: What alternative to the inservice examination requirements of Table IWB-2500-1, Examination Category B-D may be used for reactor vessels?

Reply: It is the opinion of the Committee that a VT-1 examination of the surface M-N shown in Figs.

IWB-2500-7(a) through (d) in the 1998 Edition may be performed in lieu of the volumetric examination required by Table IWB-2500-1, Examination Category B-D, Item No. B3.20 or Item No. B3.100, for inservice examination of reactor vessel nozzles other than BWR feedwater nozzles and operational control rod drive return line nozzles.

Crack-like surface flaws exceeding the acceptance criteria of Table IWB-3513-3 in the 1998 Edition are unacceptable for continued service unless the reactor vessel meets the requirements of IWB-3142.2, IWB-3142.3, or IWB-3142.4.