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A. Edward Scherer
Manager of
Nuclear Regulatory Affairs

December 12, 2002

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

SUBJECT: **San Onofre Nuclear Generating Station, Units 2 and 3**
Docket Nos. 50-361 and 50-362
Steam Generator Tube Inspection

REFERENCE: NRC to SCE letter dated June 17, 2002, Subject: San Onofre Nuclear Generating Station, Units 2 and 3 – Issuance of Amendments on Steam Generator Tube Inspections (TAC Nos. MB5145 and MB5146)

Dear Sir or Madam:

On June 17, 2002 the U. S. Nuclear Regulatory Commission (NRC) issued Amendments 189 and 180 for Units 2 and 3 to incorporate a Technical Specification change to more clearly delineate the scope of the steam generator (SG) tube inspection required in the tubesheet region (Reference). This change specified an inspection depth of five inches below the top of the tubesheet and was specifically applicable for Unit 2 Cycle 12 and Unit 3 Cycle 11 operating cycles.

Unit 3 Cycle 11 operation concludes in early January 2003 when the Unit 3 Cycle 12 refueling commences. At that time the Unit 3 Cycle 11 Technical Specification change introduced by Amendment 180 will expire and the Unit 3 SG Tube Surveillance Program Technical Specifications will revert to the original Technical Specification language. In addition, Unit 2 Technical Specifications will similarly revert to the original language at the end of Unit 2 Cycle 12 operation.

During recent communications with other licensees, the NRC has indicated that this issue will be addressed on a generic basis. Further, we understand that the NRC has concluded that the Technical Specifications governing SG tube inspections do not require modifications at this time.

Consequently, since the Unit 3 Technical Specification reverts to the original Technical Specification language at the end of Unit 3 Cycle 11 operation, Southern California Edison (SCE) concludes that a change to the Unit 3 Technical Specifications is not required to support either the SG tube inspection during the Cycle 12 refueling outage or return to operation following that outage. This conclusion also applies to Unit 2 at the end of its Cycle 12 operation.

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SCE has performed additional evaluations of the tube inspection program, in part in response to the issues raised by the NRC in the Reference. As a result of these evaluations, SCE has revised our planning scope for the upcoming Unit 3 Cycle 12 SG tube inspections to include a minimum of seven inches below the bottom of the explansion transition.

SCE will attempt to pursue resolution of this issue on a generic basis with the Nuclear Energy Institute SG Task Force and the NRC technical staff.

No new commitments are being made to the NRC by this letter. Please advise, if you do not agree with our conclusions or if the staff identifies a need for a Technical Specification change at this time. If you have any questions regarding this matter please contact Mr. Jack L. Rainsberry at (949) 368-7420.

Sincerely,

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
B. M. Pham, NRC Project Manager, San Onofre Units 2, and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 & 3
S. Y. Hsu, Department of Health Services, Radiologic Health Branch