

January 22, 2004

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

**Subject: Docket Nos. 50-361 and 50-362
Revision to the Duration of Relief Request ISI-3-6 and Relief
Request ISI-3-7 Third 10-Year Inspection Interval
San Onofre Nuclear Generating Station Units 2 and 3**

- References:
- 1) Letter from A. E. Scherer (SCE) to the Document Control Desk (NRC) dated July 2, 2003; Subject: Docket Nos. 50-361 and 50-362 Notification of Updating the Inservice Inspection Program and Submittal of Relief Requests for the Third 10-Year Inspection Interval San Onofre Nuclear Generating Station Units 2 and 3
 - 2) Letter from Herbert Berkow (NRC) to Mr. Harold B. Ray (SCE) dated December 5, 2003; Subject: San Onofre Generating Station, Units 2 and 3 - Justification Required for Mechanical Nozzle Seal Assembly (MNSA) to be Used as a Permanent Repair

Dear Sir or Madam:

This letter revises the duration of relief for Southern California Edison (SCE) relief request ISI-3-6, Mechanical Nozzle Seal Assembly (MNSA) Type 1 and for SCE relief request ISI-3-7, MNSA Type 2.

SCE relief requests ISI-3-6 and ISI-3-7, submitted by letter dated July 2, 2003, (Reference 1) requested relief for the entire third 10-year interval. MNSA Type 1 is currently installed in several locations at both Units 2 and 3. The Unit 2 Cycle 13 refueling outage is scheduled to begin within the next month. No MNSA Type 2 is currently installed. The request for the use of MNSA Type 2 is as a contingency for use during the return to service from the upcoming Units 2 and 3 Cycle 13 refueling outages.

By letter dated December 5, 2003, (Reference 2) the NRC provided guidance regarding information needed to justify the use of a MNSA as a permanent repair, and that a review period of one year would be required by the NRC. However, because Cycle 13 operation for both Units 2 and 3 will begin in 2004, there is insufficient time for SCE to provide the requested justification and for the required NRC review.

Therefore, SCE requests relief request ISI-3-6 to be approved for one cycle of operation (Cycle 13), and SCE requests that ISI-3-7, be approved for two cycles of operation (Cycles 13 and 14). At this time SCE plans to submit justification for MNSA as a permanent repair not later than one year prior to the end of Unit 2 Cycle 13, consistent with the NRC's December 5, 2003 letter.

Sincerely,



cc: B. S. Mallett, 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