

March 19, 2004

Mr. Harold B. Ray
Executive Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION (SONGS), UNITS 2 AND 3
RE: REQUEST FOR RELIEF FROM THE REQUIREMENTS OF THE
AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND
PRESSURE VESSEL CODE (CODE) CONCERNING MECHANICAL NOZZLE
SEAL ASSEMBLIES (MNSA) (TAC NOS. MC0334 AND MC0335)

Dear Mr. Ray:

By letter dated January 24, 2003, as supplemented by letters dated July 2, 2003, and January 22, 2004, Southern California Edison Company (SCE or the licensee) requested relief (ISI-3-6) from the requirements of ASME Code, Section XI for Class 1 components to continue the use of MNSA as an alternative repair method for reactor coolant system instrumentation nozzles at SONGS, Units 2 and 3.

In accordance with relief request ISI-3-6, the licensee requested an extension of relief for the MNSAs already installed and previously approved by the NRC on a cycle-by-cycle basis (MNSA-1s). By letter dated March 27, 2002, the NRC staff approved the temporary installation of the MNSA-1s only through Cycle 12, which was already an extension of one cycle beyond the initially approved two operating cycles approved by letter on July 11, 2000. The staff considers requests for installation beyond two operating cycles as permanent installation, requiring a detailed review of the design and analysis of the MNSAs and the pressure boundary of the components to which they are attached. By letter dated December 5, 2003, the NRC provided guidance regarding information needed to justify the use of MNSAs as permanent repairs. The letter also indicated that a review period of one year would be required by the NRC prior to granting authorization for permanent installation. Because SONGS Unit 2 Cycle 13 operation begins in March 2004, and SONGS Unit 3 Cycle 13 begins in the Fall 2004, SCE stated that it has not had sufficient time to provide the requested information for the required NRC review, and has therefore requested that current authorization for temporary installation of MNSA-1s be extended for both units. By letter dated January 22, 2004, SCE requested ISI-3-6 be approved for one cycle of operation during Cycle 13 for SONGS, Units 2 and 3, and plans to submit justification for MNSA-1s as a permanent repair not later than one year prior to the end of Cycle 13 for Unit 2 .

Based on the latest NRC safety evaluation dated March 27, 2002, the staff concludes that the MNSA-1s currently installed in SONGS, Units 2 and 3 will provide an acceptable level of quality and safety for one additional operating cycle. The extension of relief for one additional cycle is therefore authorized, pursuant to 10 CFR 50.55a(a)(3)(i), provided the results of inspections performed during the upcoming Cycle 13 refueling outages at the two units in accordance with

H. Ray

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the visual inspection plan as delineated in ISI-3-6 demonstrate no leakage through the installed MNSAs.

Sincerely,

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

cc w/encl: See next page

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the visual inspection plan as delineated in ISI-3-6 demonstrate no leakage through the installed MNSAs.

Sincerely,

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

cc w/encl: See next page

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San Onofre Nuclear Generating Station, Units 2 and 3

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