

September 15, 2004

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**Subject: Docket Nos. 50-361 and 50-362  
Revision to the Duration of 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 A. E. Scherer (SCE) to the Document Control Desk (NRC) dated January 22, 2004; 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

Dear Sir or Madam,

This letter revises the duration of relief for Southern California Edison (SCE) relief request ISI-3-7, MNSA Type 2.

SCE relief request ISI-3-7, submitted by letter dated July 2, 2003 (Reference 1), requested relief for the entire third 10-year interval. Our January 22, 2004, letter (Reference 2) revised the requested duration to 2 cycles of operation (Cycles 13 and 14).

Currently there is no MNSA Type 2 installed at either Unit 2 or Unit 3. If a pressurizer heater sleeve is discovered to be leaking during the Unit 3 Cycle 13 refueling outage, SCE intends to characterize the flaw to determine orientation, and intends to use the half nozzle repair technique.

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SCE is also currently planning to modify all Alloy 600 heater sleeves with Alloy 690 heater sleeves as a preemptive measure to preclude future heater sleeve leaks. This modification is planned to occur during the Unit 2 and Unit 3 Cycle 14 refueling outages (currently scheduled to begin in November of 2005 and June of 2006).

Until the Alloy 600 heater sleeves are modified during the Cycle 14 refueling outages, SCE considers the MNSA Type 2 repair, without flaw characterization, to be a prudent alternative to the half nozzle repair because it precludes the need to enter a nonscheduled reduced inventory condition.

Therefore, the request for the use of MNSA Type 2 is as a contingency for use during Cycle 13 operation and SCE requests that ISI-3-7, be approved for the period of time when core power history is greater than 30 effective full power days (EFPD) until the Cycle 14 refueling outage. (Thirty (30) EFPD was selected because the decay heat at 30 EFPD is a significant portion of the decay heat at the end of cycle.)

If you have any questions or would like additional information concerning this subject, please call Mr. Jack Rainsberry (949) 368-7420.

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 and 3