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A. Edward Scherer
Manager of
Nuclear Regulatory Affairs

December 2, 2004

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

Subject: **Docket Nos. 50-361 and 50-362**
Supporting information regarding Amendment Application Nos. 224 and 208, Proposed Change Number (PCN) 554, Technical Specification (TS) 5.5.2.15, Containment Leakage Rate Testing Program, San Onofre Nuclear Generating Station Units 2 and 3

Dear Sir or Madam:

By letter from D. E. Nunn (SCE) to the Document Control Desk (NRC) dated June 30, 2004, Southern California Edison (SCE) submitted Amendment Application Nos. 224 and 208.

Per NRC Staff request, SCE is submitting the enclosed San Onofre Nuclear Generating Station (SONGS) Independent Safety Engineering Group Operating Experience Evaluation, Subject, "NRC Information Notice 92-20, Inadequate Local Leak Rate Testing," dated June 22, 1992. This document is listed as Reference 9 in the June 30, 2004, SONGS ILRT Extension Application. Please note that procedure number changes have occurred at SONGS since 1992, and the local leak rate test (LLRT) procedures are now SO23-3-3.51.1 through SO23-3-3.51.9.

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A001

If you have any questions or require additional information, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

Enclosure

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

NOTE:
EVALUATION OF
NRC REPORT

JUNE 22, 1992

DISTRIBUTION

SUBJECT: **INFORMATION ONLY**: NRC Information Notice 92-20, "Inadequate Local Leak Rate Testing"

Attached is an "Information Only" copy of the subject ISEG operating experience evaluation. Should you have any questions or need further information, please call me.

Attachment

INDEPENDENT SAFETY ENGINEERING GROUP
OPERATING EXPERIENCE EVALUATION
JUNE 8, 1992

DOC NO: IN 92-20
PRIORITY: NORMAL ATTENTION

INADEQUATE LOCAL LEAK RATE TESTING

BACKGROUND

On February 25, 1991, the Commonwealth Edison Company performed a Type B LLRT on the containment penetration bellows for penetration X-25 at Quad Cities, Unit 1, and found an acceptable measured leakage rate of 6 standard cubic feet per hour. The LLRT was performed by pressurizing the volume between the two plies of the bellows through a test connection. On February 28, while performing the primary containment integrated leak rate test, they found excessive leakage from the penetration. An investigation of the incident revealed cracks in the bellows that were not found by the LLRT. The two plies of the bellows were found to be in contact, restricting the flow of the test medium to the crack locations.

Incidents at Dresden, Unit 2 and Perry, Unit 1 leaks were found in flanged fittings that had not been properly leak tested during ILRT's. The Dresden incident involved a torus purge exhaust inner isolation valve whose inner flange was not challenged during the ILRT. The Perry incident was with the inboard flange of a seal leakoff line on a relief valve that was not challenged during the ILRT.

An incident at Clinton, Unit 1 involved lines that were considered to be water sealed but, in actuality terminated above the suppression pool minimum drawdown level.

EVALUATION

San Onofre, Units 2 and 3 have double metallic expansion bellows penetrations on the refueling canal. The Commonwealth Edison problem was caused by the close proximity of the inner and outer bellows and the low included volume. This is not a concern at San Onofre, Units 2 and 3. The refueling canal penetration bellows has a minimum spacing between the inner and outer bellows of over 6 inches and an included volume of approximately 17 cubic feet which will preclude a similar occurrence.

San Onofre, Unit 1 has an expansion bellows on the Main Steam System, which also has a large gap between plies and has a minimum included volume of 14.1 cubic feet in the smaller chamber.

Both ISEG and Station Technical Engineering have reviewed the LLRT procedures (SO23-V-3.13.2 through SO23-V-3.13.51) for the possibility of leakage paths such as flanges that are not properly accounted for in testing. No leakage paths were found.

The Clinton event is specific to boiling water reactors and is not applicable to San Onofre.

CONCLUSION

The events described in this Information Notice have been reviewed by Station Technical Engineering and ISEG and no similar problems at san Onofre have been found. No further action is required.