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A. Edward Scherer
Manager of
Nuclear Regulatory Affairs

July 18, 2005

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

Subject: **Docket Nos. 50-361 and 50-362**
Additional Information Supporting
Amendment Application Nos. 224 and 208
Containment Leakage Rate Testing Program
San Onofre Nuclear Generating Station
Units 2 and 3

References: See Enclosure 2

Dear Sir or Madam:

This letter provides Attachments A through F, that were inadvertently omitted from our June 30, 2004, letter (Reference 1). By this letter, as supplemented by our May 27, 2005, letter (Reference 2) SCE requested a technical specification change to allow the deferral of the next ILRT Type A Test from the fourteenth refueling outage (scheduled for January 2006 for Unit 2 and October 2006 for Unit 3) to not later than March 30, 2010 for Unit 2 and September 9, 2010 for Unit 3

Additionally, by a separate submittal dated June 29, 2004, (Reference 3), SCE proposed a change to the technical specifications that, although it was unrelated to the integrated leak rate change, affected the same technical specification page (page 5.0-20a). In anticipation of the possibility that the technical specification change requested by the June 29, 2004 letter (Reference 3) may be approved prior to the integrated leak rate test change, this letter also includes the appropriately revised technical specification changes. Attachments G and H provide a clean copy of technical specification page 5.0-20a with both changes incorporated.

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P.O. Box 128
San Clemente, CA 92672
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If you have any questions or require additional information, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

Enclosures: 1) PCN 554 Licensee Evaluation Attachments A through H
2) References

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

Enclosure 1

Amendment Applications 224 and 208,

PCN 554 Licensee Evaluation

Attachments A Through H

Attachment A

(Existing Pages)

SONGS Unit 2

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a, is 45.9 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.5 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

a. The Containment overall leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for the Type A tests;

b. Air lock testing acceptance criteria are:

1) Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

2) For each door, the leakage rate is $\leq 0.01\ L_a$ when pressurized to ≥ 9.0 psig.

(continued)

Attachment B

(Existing Pages)

SONGS Unit 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

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Leakage rate acceptance criteria are:

a. The Containment overall leakage rate acceptance criterion is $\leq$ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq$ 0.60 L_a for the Type B and Type C tests and $\leq$ 0.75 L_a for the Type A tests;

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(continued)

Attachment C

(Proposed Pages)

(Redline and Strikeout)

SONGS Unit 2

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

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NEI 94-01 - 1995, Section 9.2.3: The first Type A Test performed after the March 31, 1995 Type A Test shall be performed no later than March 30, 2010.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a, is 45.9 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.5 psig) for the purpose of containment testing in accordance with this Technical Specification).

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Attachment D

(Proposed Pages)

(Redline and Strikeout)

SONGS Unit 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

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NEI 94-01 - 1995, Section 9.2.3: The first Type A Test performed after the September 10, 1995 Type A Test shall be performed no later than September 9, 2010.

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(continued)

Attachment E

(Proposed Pages)

SONGS Unit 2

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

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(continued)

Attachment F

(Proposed Pages)

SONGS Unit 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

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(continued)

Attachment G

(Proposed Pages)

SONGS Unit 2

5.5 Procedures, Programs, and Manuals (continued)

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(continued)

Attachment H

(Proposed Pages)

SONGS Unit 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.15 Containment Leakage Rate Testing Program

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(continued)

Enclosure 2

References:

References:

1) Letter from D. E. Nunn (SCE) to the U.S. Nuclear Regulatory Commission dated June 30, 2004; Subject: "Docket Nos. 50-361 and 50-362, 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."

2) Letter from B. Katz (SCE) to the U.S. Nuclear Regulatory Commission dated May 27, 2005; Subject: "Docket Nos. 50-361 and 50-362, Supplement One To 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."

3) Letter from D. E. Nunn (SCE) to the U.S. Nuclear Regulatory Commission dated June 29, 2004; Subject: "Docket Nos. 50-361 and 50-362, Proposed Change Number (NPF-10/15) 533, License Amendment Request, Miscellaneous Technical Specification Changes, San Onofre Nuclear Generating Station Units 2 and 3."