

September 2, 2005

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

**Subject: Docket Nos. 50-361 and 50-362
Additional Information in Support of Inservice Inspection Relief
Request ISI-3-14, Request Use of Subsequent ASME Code Edition
and Addenda For Pressure Testing of Welded Repair/Replacements
In Third Inspection Interval
San Onofre Nuclear Generating Station Units 2 and 3**

Reference: Letter from A. E. Scherer (SCE) to the U.S. Nuclear Regulatory
Commission dated January 28, 2005; Subject: "Docket No(s). 50-361 and
50-362, Inservice Inspection Relief Request ISI-3-14, Request Use of
Subsequent ASME Code Edition and Addenda For Pressure Testing of
Welded Repair/Replacements In Third Inspection Interval, San Onofre
Nuclear Generating Station Units 2 and 3"

Dear Sir or Madam,

On July 28, 2005, Southern California Edison (SCE) Company submitted relief request
ISI-3-14, (Reference) to allow the use of specific provisions of a later ASME Code
Edition and Addenda for pressure testing after welding.

To support the review of ISI-3-14, the U. S. Nuclear Regulatory Commission staff asked
SCE if it intends to implement the modification to the requirements of the 1998 Edition
through the 2000 Addenda of the ASME Code, Section XI, Article IWA-5213(a)
specified in 10 CFR 50.55a(b)(2)(xx).

Our response is that implementation of the pressure testing, as proposed in the Relief
Request, will meet the requirements of IWA-5213(a) as modified by 10 CFR
50.55a(b)(2)(xx) for the scope described in the Relief Request.

1047

No commitments are being made in this letter. If you have any questions, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to read "J. N. Donohew". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

cc: B. S. Mallett, Regional Administrator, NRC Region IV
J. N. Donohew, NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3