

A. Edward Scherer Manager of Nuclear Regulatory Affairs

## Withhold From Public Disclosure Under 10 CFR 2.390 (b) (4)

January 12, 2006

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

- Subject: San Onofre Nuclear Generating Station, Units 2 and 3 Docket Nos. 50-361 and 50-362 Proposed Change Number NPF-10/15-551 License Amendment Request, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)"
- Reference: SCE to NRC letter dated January 28, 2005, Subject: San Onofre Nuclear Generating Station Units 2 and 3, Docket Nos. 50-361 and 50-362, Proposed Change Number NPF-10/15-551, License Amendment Request, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)"

Dear Sir or Madam:

The referenced letter submitted Southern California Edison (SCE) Proposed Change Number (PCN)-551 to request amendment to Operating License Numbers NPF-10 and NPF-15 to change the Technical Specifications for San Onofre Units 2 and 3 to relocate the reactor coolant system (RCS) pressure-temperature curves and limits from the Technical Specifications to a licensee-controlled document identified as the Pressure and Temperature Limits Report (PTLR).

Subsequently, NRC Requests for Additional Information (RAIs) were received.

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When Separated from the Proprietary Enclosure (Enclosure 1), this Document is Decontrolled

Enclosure 1, Westinghouse Proprietary document: "Response to NRC Request for Additional Information on WCAP-16005-NP, Rev. 03, "San Onofre Nuclear Generating Station Unit 2 RCS Pressure and Temperature Limits Report" and WCAP-16167-NP, Rev. 0, "San Onofre Nuclear Generating Station Unit 3 RCS Pressure and Temperature Limits Report" addresses these requests and provides specific responses to each.

Enclosure 2, is identical to Enclosure 1 but in a non-proprietary form.

Appendix A of Enclosures 1 and 2 provides "Justification for Exemption to Apply Alternative Method of Calculating the Stress Intensity Factor  $K_{IM}$  due to Internal Pressure Loading for San Onofre Units 2 and 3" in response to NRC RAI #2. This Justification for Exemption is submitted for acceptance as part of the NRC review of these amendment requests.

Enclosure 3, Westinghouse authorization letter CAW-05-2078 to the U.S. Nuclear Regulatory Commission dated December 15, 2005 provides an affidavit, Proprietary Information Notice, and Copyright Notice.

As Enclosure 1 contains information proprietary to Westinghouse Electric Company LLC, it is supported by an affidavit signed by the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-05-2078 and should be addressed to B. F. Maurer, Acting Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

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

Sincerely,

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Enclosures:

- Westinghouse Proprietary document LTR-RCPL-05-153, Attachment 1: "Response to NRC Request for Additional Information on WCAP-16005-NP, Rev. 03, "San Onofre Nuclear Generating Station Unit 2 RCS Pressure and Temperature Limits Report"; and WCAP-16167-NP, Rev. 0, "San Onofre Nuclear Generating Station Unit 3 RCS Pressure and Temperature Limits Report." (4 copies)
- Westinghouse Non-Proprietary document LTR-RCPL-05-153, Attachment 2: "Response to NRC Request for Additional Information on WCAP-16005-NP, Rev. 03, "San Onofre Nuclear Generating Station Unit 2 RCS Pressure and Temperature Limits Report"; and WCAP-16167-NP, Rev. 0, "San Onofre Nuclear Generating Station Unit 3 RCS Pressure and Temperature Limits Report." (2 copies)
- 3. Westinghouse letter to the U.S. Nuclear Regulatory Commission dated December 15, 2005, an affidavit requesting that enclosure 1 be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

cc: B. S. Mallett, Regional Administrator, NRC Region IV

- N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
- C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3

S. Y. Hsu, Department of Health Services, Radiological Health Branch