

January 18, 2006

Mr. Richard M. Rosenblum  
Chief Nuclear Officer  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION (SONGS), UNIT 2 -  
REQUEST FOR ADDITIONAL INFORMATION CONCERNING RESPONSE TO  
GENERIC LETTER 2004-01, "REQUIREMENTS FOR STEAM GENERATOR  
TUBE INSPECTIONS" (TAC NO. MC4849)

Dear Mr. Rosenblum:

On August 30, 2004, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-01, "Requirements For Steam Generator Tube Inspections." The purpose of GL 2004-01 was to obtain information that would enable the NRC staff to determine whether licensees' steam generator tube inspection programs comply with the existing tube inspection requirements (the plant technical specifications in conjunction with Appendix B to Part 50 of Title 10 of the *Code of Federal Regulations*).

By letter dated October 26, 2004 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML043020250), as supplemented by letter dated November 23, 2005 (ADAMS Accession Number ML053320210), Southern California Edison (SCE), the licensee for SONGS, submitted the response to GL 2004-01.

The NRC Staff has reviewed the SCE response to GL 2004-01 for SONGS, Unit 2, and determined that additional information is needed in order for the NRC staff to complete a review. The NRC staff requests that you forward the enclosed questions to the licensee.

If you have any questions, please me at (301) 415-1480.

Sincerely,  
**/RA/**

N. Kalyanam, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-361

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO SOUTHERN CALIFORNIA EDISON  
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2, GL-2004-01 RESPONSE  
DOCKET NO. 50-361

On August 30, 2004, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-01, "Requirements For Steam Generator Tube Inspections." The purpose of GL 2004-01 was to obtain information that would enable the NRC staff to determine whether licensees' steam generator (SG) tube inspection programs comply with the existing tube inspection requirements (the plant technical specifications in conjunction with Appendix B to Part 50 of Title 10 of the *Code of Federal Regulations*).

By letter dated October 26, 2004 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML043020250), as supplemented by letter dated November 23, 2005 (ADAMS Accession Number ML053320210), Southern California Edison, the licensee for San Onofre Nuclear Generating Station, Unit No. 2, submitted a response to GL 2004-01. The NRC staff has reviewed these letters and has determined that additional information is needed in order for the NRC staff to complete a review. The NRC staff requests that the licensee respond to the following:

In its response to GL 2004-01, the licensee indicated the following concerning inspections of the parent tube behind (i.e., adjacent to) the nickel band portion of Combustion Engineering Alloy 690 tungsten inert gas welded sleeves: (1) the inspections adjacent to the nickel band are limited; (2) completion of the ongoing evaluation and technical basis development is expected within the next year; (3) this issue is being tracked within their corrective action program; and (4) flaws in the parent tube adjacent to the nickel band are not safety significant.

Given that it is not clear whether inspection techniques are capable of finding the forms of degradation that could be occurring in the parent tube adjacent to the nickel band and the licensee is relying on a safety assessment indicating that inspections in this region are not needed to ensure structural and leakage integrity, it would appear that a license amendment is required consistent with the NRC staff position outlined in GL 2004-01.

With respect to the qualification of a technique for inspecting the parent tube adjacent to the nickel band, the NRC staff notes that existing analysis is based on electro-discharged machined (EDM) notches with adjustments to account for differences between cracks and EDM notches. As discussed in Regulatory Issue Summary 2000-22, "Issues Stemming from NRC Staff Review of Recent Difficulties Experienced in Maintaining Steam Generator Tube Integrity," the NRC staff position is that technique qualifications based on EDM notched specimens do not provide an adequate basis for evaluating the technique capability since EDM notched specimens produce much larger amplitude signals and have better signal-to-noise levels. EDM notches may also produce different signal response characteristics.

As a result of the above, we request the licensee discuss their plans (and schedule) for submitting an amendment demonstrating that structural and leakage integrity of the joint are ensured without inspecting the parent tube behind (i.e., adjacent to) the nickel band region. Alternatively, the licensee could either (1) demonstrate that the techniques they are using are capable of finding the forms of degradation that could be in the parent tube behind the nickel band region, or (2) commit to remove all sleeves with a nickel band from service.

San Onofre Nuclear Generating Station  
Units 2 and 3

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November 2005