

October 20, 2006

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

**Subject: Docket No. 50-362  
Additional Information Supporting the Third Ten-Year Inservice  
Inspection (ISI) Interval Relief Request ISI-3-22 for Alternative to  
ASME Code Rules for the Inside Diameter Structural Weld Overlay  
Repair Process for Control Element Drive Mechanism (CEDM) #56  
San Onofre Nuclear Generating Station, Unit 3**

**Reference:** Letter from A. E. Scherer to the U. S. Nuclear Regulatory Commission dated May 11, 2006; Subject: Docket No. 50-362, Third Ten-Year Inservice Inspection (ISI) Interval Relief Request ISI-3-22 Request for Alternative to ASME Code Rules for the Inside Diameter Structural Weld Overlay Repair Process for Control Element Drive Mechanism (CEDM) #56, San Onofre Nuclear Generating Station, Unit 3

Dear Sir or Madam:

By letter dated May 11, 2006 (referenced), Southern California Edison (SCE) submitted Inservice Inspection (ISI) Relief Request ISI-3-22. In support of the NRC staff's review of Relief Request ISI-3-22, SCE is making the following commitment:

SCE will provide:

- 1) a comparison of the proposed inspection technique to the technique used in the Electric Power Research Institute (EPRI) Material Reliability Program (MRP)-89 demonstration report, and
- 2) the results of the Westinghouse technical justification analysis of the capability to monitor the residual indication and detect future growth in a manner consistent with the original EPRI - MRP demonstration.

If you have any questions or would like additional information concerning this subject, please contact Ms. Lynn Pressey at (949) 368-6351.

Sincerely,

A handwritten signature in black ink, appearing to read "B. S. Mallett". 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  
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3