

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 a large initial "B" and "S".

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