

October 26, 2006

Mr. Richard M. Rosenblum
Senior Vice President and 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, UNITS 2 AND 3 -
REQUEST FOR ADDITIONAL INFORMATION ON THE PROPOSED
AMENDMENT TO REVISE FUEL STORAGE POOL BORON
CONCENTRATION (TAC NOS. MD1405 AND MD1406)

Dear Mr. Rosenblum:

By letter dated April 28, 2006 (Agencywide Documents Access and Management System Accession No. ML061220701), Southern California Edison submitted an application to change the San Onofre Nuclear Generating Station, Units 2 and 3, technical specifications related to fuel storage pool boron concentration. The proposed change will increase the minimum allowed boron concentration of the spent fuel pool and allow credit for soluble boron, guide tube inserts (GT-Inserts) made from borated stainless steel, and fuel storage patterns in place of Boraflex.

After reviewing your request, the Nuclear Regulatory Commission staff has determined that additional information as required below is needed to complete the review. We discussed this information with your staff by telephone and they agreed to provide the additional information requested by November 16, 2006.

1. Section 2.10 of the Spent Fuel Pool (SFP) Boron Dilution Analysis states that the SFP boron concentration must be verified in accordance with Licensee Controlled Specification 3.7.116 at least every 30 days. Clarify how this verification relates to Technical Specification Surveillance Requirement 3.7.17.1, which requires verification of the SFP boron concentration every 7 days.

R. Rosenblum

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2. Given the many dilution paths mentioned, describe how the 7-day surveillance interval is adequate to detect slow boron dilution events. In particular, address the case where unborated makeup is provided for a small (1 - 2 gallons per minute) leak that may be overlooked as an unusual condition and processed through radwaste or be otherwise undetected.

If you have any questions, please contact 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 Nos. 50-361 and 50-362

cc: See next page

R. Rosenblum

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- 2. Given the many dilution paths mentioned, describe how the 7-day surveillance interval is adequate to detect slow boron dilution events. In particular, address the case where unborated makeup is provided for a small (1 - 2 gallons per minute) leak that may be overlooked as an unusual condition and processed through radwaste or be otherwise undetected.

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

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/RA/

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

Docket Nos. 50-361 and 50-362

cc: See next page

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*No major change from Staff provided RAI

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San Onofre Nuclear Generating Station
Units 2 and 3

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March 2006

San Onofre Nuclear Generating Station
Units 2 and 3

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cc:

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March 2006