

November 2, 2007

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

Subject: **Docket Nos. 50-361 and 50-362**  
**Submittal of Supplement 3 to Proposed Technical Specification**  
**Change Number NPF-10/15-572 License Amendment Request,**  
**“Proposed Technical Specification Change, Steam Generator Tube**  
**Surveillance Program, Tube Repair”**  
**San Onofre Nuclear Generating Station, Units 2 and 3**

References: Letter from Brian Katz (SCE) to Document Control Desk (NRC) dated September 26, 2007, Subject: Response to Request for Additional Information and Submittal of Supplement 2 to Proposed Technical Specification Change Number NPF-10/15-572 License Amendment Request, “Proposed Technical Specification Change, Steam Generator Tube Surveillance Program, Tube Repair” San Onofre Nuclear Generating Station, Units 2 and 3,

Dear Sir or Madam:

Enclosure 3, (Supplement 3 to this amendment request) provides a specific limitation in the San Onofre Units 2 and 3 Technical Specifications to identify dates by which all sleeves will be removed from service for each Unit.

Supplement 3 provides a revised Technical Specification page for San Onofre Units 2 and Unit 3 to incorporate this change. The revised pages are to replace the corresponding pages previously submitted in Supplement 2.

The No Significant Hazards Consideration and Environmental Evaluation provided with PCN-572 both remain bounding.

This Amendment request Technical Specification change will be incorporated by Southern California Edison within 30 days of NRC approval.

A001

NRR

Should you have any questions, or require additional information, please contact Ms. L. T. Conklin at (949) 368-9443.

Sincerely,

A handwritten signature in black ink that reads "Brian Katz". The signature is written in a cursive style with a large, stylized "K" and a long, sweeping underline.

Enclosures:

1. Notarized affidavit, Unit 2
2. Notarized affidavit, Unit 3
3. Supplement 3 to the Proposed License Amendment Request, Proposed Change Number 572 with attachments A – D (Revised Technical Specification change pages)

cc: E. E. Collins, Jr., 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, California Department of Public Health, Radiologic Health Branch

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA	)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	Docket No. 50-361
License to Acquire, Possess, and Use	)	Supplement 3 to
a Utilization Facility as Part of	)	Amendment Application
Unit No. 2 of the San Onofre Nuclear	)	No. 245
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Supplement 3 to Amendment Application No. 245. This amendment application consists of Supplement 3 to Proposed Change No. 572 which is a request to revise Facility Operating License NPF-10 to update the Technical Specification steam generator program.

State of California  
County of San Diego

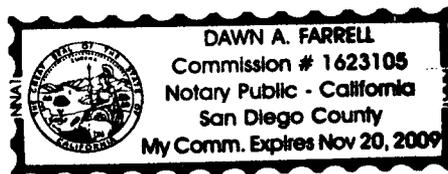
Brian Katz  
Brian Katz, Vice President

Subscribed and sworn to (~~or affirmed~~) before me on this 2nd day of November, 2007.

by Brian Katz

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Dawn A. Farrell  
Notary Public



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA	)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	Docket No. 50-362
License to Acquire, Possess, and Use	)	Supplement 3 to
a Utilization Facility as Part of	)	Amendment Application
Unit No. 3 of the San Onofre Nuclear	)	No. 230
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Supplement 3 to Amendment Application No. 230. This amendment application consists of Supplement 3 to Proposed Change No. 572 which is a request to revise Facility Operating License NPF-15 to update the Technical Specification steam generator program.

State of California  
County of San Diego

Brian Katz  
Brian Katz, Vice President

Subscribed and sworn to (~~or affirmed~~) before me on this 2nd day of November, 2007.

By Brian Katz

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Dawn A. Farrell  
Notary Public



ENCLOSURE 3

Supplement 3 to the Proposed License Amendment Request

Proposed Change Number 572 with attachments A – D  
(Revised Technical Specification change pages)

## LICENSEE'S EVALUATION

### DESCRIPTION FOR PROPOSED TECHNICAL SPECIFICATION CHANGE NPF-10/15-572 SUPPLEMENT 3, STEAM GENERATOR TUBE SURVEILLANCE PROGRAM, TUBE REPAIR

San Onofre Nuclear Generating Station Units 2 and 3

#### PCN-572 SUPPLEMENT 3 PROPOSED TECHNICAL SPECIFICATION CHANGE REVISIONS (changes indicated by highlight and strikeout)

Unit 2: see Attachment A  
Unit 3: see Attachment B

#### PCN-572 SUPPLEMENT 3 PROPOSED TECHNICAL SPECIFICATIONS PAGE

(Replacement Page – to replace a corresponding page previously submitted to the NRC in Supplement 2)

Unit 2: see Attachment C  
Unit 3: see Attachment D

### 1.0 INTRODUCTION

Supplement 3 to PCN-572 provides a specific limitation that all sleeves will be removed from service by a specified date (in response to an NRC request for additional information).

### 2.0 PROPOSED CHANGE

Supplement 3 provides a revised page for each Unit to incorporate the provision of a specific limitation that all steam generator sleeves will be removed from service by a specified date. The revised Technical Specification pages included in Supplement 3 are to replace the corresponding page number 5.0-16 for each Unit previously submitted in Supplement 2 to this amendment request.

### 3.0 REGULATORY SAFETY ANALYSIS

The No Significant Hazards Consideration and Environmental Evaluation provided with PCN-572 both remain bounding.

**Attachment A**

**PCN-572 SUPPLEMENT 3**

**PROPOSED TECHNICAL SPECIFICATION CHANGE REVISIONS**

(Supplement 3 Changes indicated by highlight and strikeout)

**SONGS Unit 2**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator (SG) Program (continued)

type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
2. Inspect 100% of the tubes at sequential periods of 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. No SG shall operate for more than 24 effective full power months or one refueling outage (whichever is less) without being inspected.
3. If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.
4. All sleeves shall be inspected with eddy current prior to initial operation. This includes pressure retaining portions of the parent tube in contact with the sleeve, the sleeve-to-tube weld and the pressure retaining portion of the sleeve.

e. Provisions for monitoring operational primary to secondary LEAKAGE.

f. Provisions for SG tube repair methods. Steam generator tube repair methods shall provide the means to re-establish the RCS pressure boundary integrity of SG tubes without removing the tube from service. For the purposes of these Specifications, tube plugging is not a repair. All acceptable tube repair methods are listed below.

1. TIG welded sleeving with heat treatment, as described in ABB/CE Topical Report, CEN-630-P, Rev. 2, is currently approved by the NRC until December 2009. All sleeves shall be removed from service by December 2009.

Tube repair can be performed on certain tubes that have been previously plugged as a corrective or preventive measure. A tube inspection of the entire length of the tube shall be performed on a previously plugged tube prior to returning the tube to service.

**Attachment B**

**PCN-572 SUPPLEMENT 3**

**PROPOSED TECHNICAL SPECIFICATION CHANGE REVISIONS**

(Supplement 3 Changes indicated by highlight and strikeout)

**SONGS Unit 3**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator (SG) Program (continued)

type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
  2. Inspect 100% of the tubes at sequential periods of 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. No SG shall operate for more than 24 effective full power months or one refueling outage (whichever is less) without being inspected.
  3. If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.
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Tube repair can be performed on certain tubes that have been previously plugged as a corrective or preventive measure. A tube inspection of the entire length of the tube shall be performed on a previously plugged tube prior to returning the tube to service.

**Attachment C**

**PCN-572 SUPPLEMENT 3 PROPOSED TECHNICAL SPECIFICATIONS PAGE**  
(Replacement Page for the Corresponding Supplement 2 Page)

**SONGS Unit 2**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator (SG) Program (continued)

type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
  2. Inspect 100% of the tubes at sequential periods of 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. No SG shall operate for more than 24 effective full power months or one refueling outage (whichever is less) without being inspected.
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Tube repair can be performed on certain tubes that have been previously plugged as a corrective or preventive measure. A tube inspection of the entire length of the tube shall be performed on a previously plugged tube prior to returning the tube to service.

**Attachment D**

**PCN-572 SUPPLEMENT 3 PROPOSED TECHNICAL SPECIFICATIONS PAGE**  
(Replacement Page for the Corresponding Supplement 2 Page)

**SONGS Unit 3**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator (SG) Program (continued)

type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
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