

December 24, 2007

James T. Reilly  
Vice President

James. E. Dyer, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: **Docket No. 50-362**  
**Completion of Actions and Commitments from**  
**Confirmatory Action Letter Re: Alloy 82/182**  
**Pressurizer Butt Welds**  
**San Onofre Nuclear Generating Station, Unit 3**

- References:
- 1) Letter from J. E. Dyer (NRC) to R. M. Rosenblum (SCE) dated March 22, 2007, Subject: San Onofre Nuclear Generating Station, Units 2 and 3 – Confirmatory Action Letter (TAC Nos. MD4181 and MD4182)
  - 2) Letter from A. E. Scherer (SCE) to Document Control Desk (NRC) dated March 7, 2007, Subject: Docket Nos. 50-361 and 50-362, Inspection and Mitigation of Alloy 82/182 Pressurizer Butt Welds, San Onofre Nuclear Generating Station, Units 2 and 3
  - 3) Letter from A. E. Scherer (SCE) to Document Control Desk (NRC) dated November 09, 2007, Subject: Docket No. 50-362, Ultrasonic Test Results Related to Inspection (ISI) Interval Relief Request ISI-3-25 for the Use of Structural Weld Overlay and Associated Alternative Repair Techniques, San Onofre Nuclear Generating Station, Unit 3

Dear Sir:

The purpose of this letter is to provide documentation of completion of the actions and commitments addressed in your Confirmatory Action Letter dated March 22, 2007 (Reference 1) for San Onofre Nuclear Generating Station (SONGS) Unit 3. Reference 1 confirmed actions and commitments made by Southern California Edison regarding Alloy 82/182 butt welds in the pressurizers at the San Onofre Nuclear Generating Station, Units 2 and 3.

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pressurized water reactor discovered several circumferential indications in its pressurizer surge, safety, and relief nozzles. Because of the potential importance of this issue, SCE submitted a letter dated March 7, 2007 (Reference 2) to notify you of actions taken and planned for inspecting and mitigating Alloy 600/82/182 butt welds on pressurizer spray, surge, and safety nozzles at San Onofre Nuclear Generating Station (SONGS), Unit 2 and Unit 3.

As outlined in Reference 2, the only remaining pressurizer nozzle that was susceptible to Pressurized Water Stress Corrosion Cracking (PWSCC) failure was the surge line nozzle for each unit. Reference 2 provided a commitment that SCE would not operate SONGS Units 2 and 3 after December 31, 2007, until Units 2 and 3 were in compliance with the MRP-139 guidance. In addition, Reference 2 provided a commitment that SCE would implement an enhanced Reactor Coolant System (RCS) leakage monitoring program for SONGS Units 2 and 3 which supplements the existing plant programs and procedures. The enhanced program would be in place at each unit until the pressurizer surge line butt welds were successfully brought into compliance with MRP-139.

Reference 1 confirmed these commitments with two clarifications:

1. MRP-139 would be met through mitigation of the pressurizer surge line nozzle welds, and,
2. The NRC would be informed in writing if SCE revised the commitment to the enhanced leakage monitoring program, reporting requirements, or the commitment to have all pressurizer dissimilar metal welds compliant with MRP-139, prior to operation after December 31, 2007.

Reference 1 also provided a requirement to notify you in writing when SCE had completed these actions and commitments.

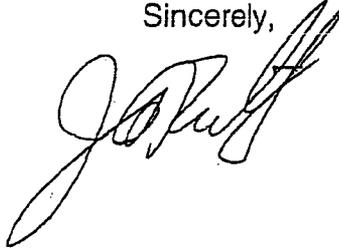
During the recent Unit 3 Mid-Cycle outage, mitigation of the Unit 3 pressurizer surge line nozzle weld was completed and post-mitigation inspections were performed. The results of these inspections were provided to the NRC by letter dated November 09, 2007 (Reference 3). No suspected flaw indications, such as lack of bond, weld flaws, planar flaws, or laminar flaws, were observed during the examinations.

As a result of the completion of the mitigation of the SONGS Unit 3 pressurizer surge line nozzle weld, SCE has satisfied the commitment to mitigate these welds and is no longer performing enhanced RCS leakage monitoring at SONGS Unit 3. This letter also satisfies the requirement for SONGS Unit 3 to notify you in writing that the actions and commitments of Reference 2 are complete.

Closure of actions and commitments from Reference 1 for Unit 2 will be addressed by a separate letter.

Should you have any questions, please contact Ms. Linda T. Conklin at 949-368-9443.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Dyer", written in black ink.

cc: E. E. Collins, 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  
NRC Document Control Desk