

September 8, 2008

Mr. Ross T. Ridenoure
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 -
CORRECTIONS TO SAFETY EVALUATIONS ISSUED FOR APPROVAL TO
USE ALTERNATIVES TO REQUIREMENTS FOR REPAIR/REPLACEMENT
ACTIVITIES RELATED TO THE PERFORMANCE OF STRUCTURAL WELD
OVERLAYS (TAC NOS. MD4580, MD4581, MD6256, AND MD6257)

Dear Mr. Ridenoure:

By letters dated February 21 and August 1, 2007 to the U.S. Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML070570433 and ML072150046, respectively), Southern California Edison Company (SCEC, the licensee) submitted two requests to approve the use of alternatives to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, 1995 Edition through 1996 Addenda, IWA-4000, for repair/replacement activities related to the performance of structural weld overlays at San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, for the third 10-year inservice inspection (ISI) interval. Specifically, these two letters addressed Relief Requests (RRs) ISI-3-27 and ISI-3-28. The NRC staff authorized these RR's in its two letters dated December 13, 2007 (ADAMS Accession Nos. ML073240437 and ML073250004).

The RR's ISI-3-27 and ISI-3-28 involved weld overlays for the reactor coolant system hot leg nozzles and the pressurizer surge nozzles. In the licensee's letter dated August 29, 2008, SCEC states that in preparation for implementation of these weld overlays it discovered that there was an error in the information provided to the NRC staff in its letters dated February 21 and August 1, 2007.

In letters dated February 21 and August 1, 2007, the base material specification for the hot leg surge line nozzle forging and the shutdown cooling line nozzle forging was stated to be SA-105 Grade II for both Units 2 and 3. In letter dated August 29, 2008 (ADAMS Accession No. ML082470024), SCEC states that this is true for Unit 2; however, for Unit 3, the base material specification for these two nozzle forgings is SA-541, Class 1. SCEC states that, based on the similar properties of these two materials, it believed that its conclusions for Unit 3 in the relief requests are unchanged and, thus, the basis for the relief requests for Unit 3 remain valid.

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The NRC staff reviewed the correction to the base material for the two nozzles for Unit 3 stated in the SCEC letter dated August 29, 2008. We agree with SCEC's conclusion that the above difference in the specified base material does not change the NRC staff conclusions in our two above letters dated December 13, 2007, and the attached safety evaluations.

Sincerely,

/RA/

Jack N. Donohew, 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

The NRC staff reviewed the correction to the base material for the two nozzles for Unit 3 stated in the SCEC letter dated August 29, 2008. We agree with SCEC's conclusion that the above difference in the specified base material does not change the NRC staff conclusions in our two above letters dated December 13, 2007, and the attached safety evaluations.

Sincerely,

/RA/

Jack N. Donohew, 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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ADAMS Accession Nos.: ML082460930

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	DCI/CPNB/BC	NRR/LPL4/BC	NRR/LPL4/PM
NAME	JDonohew	GLappert	TChan	MMarkley	JDonohew
DATE	9/03/08	09/03/08	09/02/08	9/08/08	9/08/08

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San Onofre Nuclear Generating Station
Units 2 and 3

(June 2008)

cc:

Douglas K. Porter, Esquire
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Mayor
City of San Clemente
100 Avenida Presidio
San Clemente, CA 92672

Dr. David Spath, Chief
Division of Drinking Water and
Environmental Management
California Dept. of Health Services
850 Marina Parkway, Bldg P, 2nd Floor
Richmond, CA 94804

Mr. James T. Reilly
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Chairman, Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 335
San Diego, CA 92101

Mr. James D. Boyd
California State Liaison Officer
Vice Chair and Commissioner
California Energy Commission
1516 Ninth Street, MS 31
Sacramento, CA 95814

Mark L. Parsons
Deputy City Attorney
City of Riverside
3900 Main Street
Riverside, CA 92522

Mr. Gary Butner
Acting Branch Chief
Department of Public Health Services
Radiologic Health Branch
MS 7610, P.O. Box 997414
Sacramento, CA 95899-7414

Mr. Gary L. Nolff
Assistant General Manager - Resources
Riverside Public Utilities
City of Riverside, California
3901 Orange Street
Riverside, CA 92501

Vice President and Site Manager
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-41254

Mr. A. Edward Scherer
Director, Nuclear Regulatory Affairs
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Mr. Michael L. De Marco
San Diego Gas & Electric Company
8315 Century Park Ct. CP21G
San Diego, CA 92123-1548

Resident Inspector
San Onofre Nuclear Generating Station
c/o U.S. Nuclear Regulatory Commission
Post Office Box 4329
San Clemente, CA 92674