

November 4, 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 -  
REQUEST FOR ADDITIONAL INFORMATION REGARDING THE LICENSE  
AMENDMENT REQUEST TO SUPPORT REPLACEMENT STEAM  
GENERATORS (TAC NOS. MD9160 & MD9161)

Dear Mr. Ridenoure:

By letter dated June 27, 2008 to the U.S. Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081830421), Southern California Edison (the licensee) requested an amendment to the San Onofre Nuclear Generating Station, Units 2 and 3, Facility Operating Licenses and Technical Specifications (TS). The proposed changes are in support of the replacement steam generators (SGs) and reflect revised SG inspection and repair criteria and revised peak containment post-accident pressure resulting from installation of the replacement SGs.

The NRC staff has reviewed your submittal and determined that additional information is needed to complete the review. We discussed the need for the enclosed request for additional information with your staff by telephone and they agreed to provide a response within 30 days from the receipt of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. 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

Enclosure: As stated

cc w/encl: See next page

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ADAMS Accession No. ML083050122

(\*) No major change from Staff provided RAI

OFFICE	NRR/LPL4/PM	NRR/LPL4/PM	NRR/DSS/SCVB	NRR/LPL4?BC	NRR/LPL4/PM
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DATE	11/4/08	11/4/08	11/29/08	11/4/08 <i>for</i>	11.4.08

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Mr. Ross T. Ridenoure  
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The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your submittal and determined that the additional information is needed to complete the review. We discussed the need for the enclosed request for additional information with your staff by telephone and they agreed to provide a response within 30 days from the receipt of this letter.

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Sincerely,

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

Enclosure: As stated

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**ADAMS Accession No. ML083050122**

(\*) No major change from Staff provided RAI

OFFICE	NRR/LPL4/PM	NRR/LPL4/PM	NRR/DSS/SCVB	NRR/LPL4?BC	NRR/LPL4/PM
NAME	NKalyanam	GLappert	RDennig	MMarkley	NKalyanam
DATE					

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 4, 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 -  
REQUEST FOR ADDITIONAL INFORMATION REGARDING THE LICENSE  
AMENDMENT REQUEST TO SUPPORT REPLACEMENT STEAM  
GENERATORS (TAC NOS. MD9160 AND MD9161)

Dear Mr. Ridenoure:

By letter dated June 27, 2008 to the U.S. Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081830421), Southern California Edison (the licensee) requested an amendment to the San Onofre Nuclear Generating Station, Units 2 and 3, Facility Operating Licenses and Technical Specifications (TS). The proposed changes are in support of the replacement steam generators (SGs) and reflect revised SG inspection and repair criteria and revised peak containment post-accident pressure resulting from installation of the replacement SGs.

The NRC staff has reviewed your submittal and determined that additional information is needed to complete the review. We discussed the need for the enclosed request for additional information with your staff by telephone and they agreed to provide a response within 30 days from the receipt of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If you have any questions, please contact me at (301) 415-1480.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Kalyanam", is written over a horizontal line.

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

Enclosure: As stated

cc w/encl: See next page

REQUEST FOR ADDITIONAL INFORMATION (RAI)

SOUTHERN CALIFORNIA EDISON

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

TAC NOS. MD9160 AND MD9161

By letter dated June 27, 2008 to the U.S. Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081830421), Southern California Edison (the licensee) submitted a license amendment request (LAR) to the San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3). The proposed changes are in support of the replacement steam generators (RSGs) and reflect revised steam generators (SGs) inspection and repair criteria and revised peak containment post-accident pressure resulting from installation of the replacement SGs.

The NRC staff has reviewed your submittal and determined that the following additional information is needed to complete the review:

1. It was stated in Section 3.0 of the enclosure to the LAR that the containment post-accident pressure, mass and energy analyses for the design basis loss-of-coolant accident (LOCA) and main steam line break (MSLB) used the existing methodology while accounting for the differences between the RSGs and the existing SGs. Section 4.2.1.2 mentions examples of the differences such as greater water volume, higher secondary side operating pressure, greater heat transfer area and larger metal mass. Please quantify the differences between the RSG and the existing SG to the extent they were used in the analyses.
2. Section 4.2.3.1 states that the methodology used in the new evaluation is identical to the methodology used in the current licensing basis evaluation of the SONGS 2 and 3, and that only input parameters have been updated. Other than input parameter changes required by the differences between the RSGs and existing SGs (as would be included in the response to the RAI above), what other input parameters have been updated and why are they updated? Please explain how the updated parameters are still expected to yield conservative results?
3. Tables 4.2-1 and 4.2-3 provided a summary of significant inputs, significant points of methodology, and assumptions for LOCA and MSLB respectively. Please indicate if all of them are the same between the existing and new analyses with the exception of differences dictated by the SG change out, and if they are different, explain the reasons for the difference and how they would still provide conservative results.
4. Section 4.2.3.2.1, Page 14 of 40 – In the statement, "Although test data indicate that significant condensation of steam occurs at the safety injection location, the model accounts for only 50 percent condensation during the interval when the annulus is predicted to be full and the SITs [safety injection tanks] are injecting. No credit is taken for condensation at the safety injection location at other times," please explain what is the test data that indicates significantly more than 50 percent condensation occurs at the safety injection location?

San Onofre Nuclear Generating Station  
Units 2 and 3

cc:

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