



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

July 20, 2012

Mr. Peter T. Dietrich  
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 ISI-3-35 FOR USE OF A SUBSEQUENT EDITION OF THE  
ASME OM CODE FOR SNUBBERS PROGRAM IN ACCORDANCE WITH  
10 CFR 50.55A(G)(4)(IV) (TAC NOS. ME7542 AND ME7543)

Dear Mr. Dietrich:

By letter dated October 21, 2011, Southern California Edison Company (SCE), the licensee for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, submitted Request ISI-3-35 to allow the use of a subsequent American Society of Mechanical Engineers (ASME) Code Edition and Addenda for its snubber program. This request is for the remaining third 10-year inservice inspection (ISI) interval and fourth 10-year inservice testing (IST) intervals. The request involves the inservice examination and testing of snubbers at SONGS, Units 2 and 3.

The current edition of the ASME Boiler and Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," for SONGS, Units 2 and 3, for the third 10-year ISI interval is the 1995 Edition with 1996 Addenda, and for the fourth 10-year IST interval is the 2005 Addenda through 2008a Edition. Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(4)(iv), the licensee requested U.S. Nuclear Regulatory Commission (NRC) approval to use the ISTA and ISTD subsections of the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) for ISI items subject to the limitations and modifications listed in 10 CFR 50.55a(b).

The SONGS ISI and IST Intervals are at this time concurrent, both ending on August 17, 2013, and, therefore, the interval specified is the same for either program (ISI or IST) is used. The request for relief is to allow a transition from Licensee Controlled Specifications, which is based upon the ASME Code, Section XI, to the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code), Section ISTD and the request is to last for the remainder of the third ISI (and IST) testing interval.

In order to avoid the extension of the ISI interval, for some unforeseen reason, impacting the Snubber program, SCE has requested that the Snubber program, in accordance with OM Code Section ISTD, to transition into the new 120-month interval with the rest of the IST program.

The NRC staff has reviewed the subject request and concludes, as set forth in the enclosed safety evaluation, that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(g)(4)(iv), and is in compliance with the ASME OM Code

P. Dietrich

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requirements. Therefore, the NRC staff approves Request ISI-3-35 for the remainder of third 10-year ISI interval which will end on August 27, 2012, and the fourth 10-year IST interval, which is scheduled to end on August 17, 2023.

All other ASME Code, Section XI requirements for which an alternative was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions, please contact Kaly Kalyanam at 301-415-1480 or [kaly.kalyanam@nrc.gov](mailto:kaly.kalyanam@nrc.gov).

Sincerely,



Michael T. Markley, Chief  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure:  
Safety Evaluation

cc w/encl: Distribution via ListServ



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST ISI-3-35 - USE OF SUBSEQUENT EDITION OF

ASME OM CODE FOR SNUBBERS PROGRAM

SOUTHERN CALIFORNIA EDISON

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated October 21, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML112971506), Southern California Edison. (SCE, the licensee), submitted Request ISI-3-35 to request U.S. Nuclear Regulatory Commission (NRC) approval to allow the usage of subsequent American Society of Mechanical Engineers (ASME) Code Edition and Addenda for its snubber program. The request involves the inservice examination and testing of snubbers at San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, and is applicable to the remainder of the third 10-year inservice inspection (ISI) and fourth 10-year inservice testing (IST) intervals.

The current ASME Boiler and Pressure Vessel Code (B&PV or ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," Edition for SONGS, Units 2 and 3, for the third 10-year ISI interval is the 1995 Edition with 1996 Addenda, and for the fourth 10-year ISI interval is the 2005 Addenda through 2008a Edition. The snubber inservice examination and testing requirements were deleted in the 2006 Addenda through 2008a Edition of the ASME Code, Section XI. Therefore, the applicable ASME Code for snubber inservice examination and testing, for the plants committed to the 2006 Addenda and later Edition of the ASME Code, Section XI, is the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code), 2004 Edition with 2005 and 2006 Addenda. In Request ISI-3-35, the licensee requested to use ASME OM Code, 2004 Edition with 2005 and 2006 Addenda, for its snubber inservice examination and testing at SONGS, Units 2 and 3. Specifically, pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(g)(4)(iv), the licensee requested approval to use the subsequent ASME OM Code 2004 Edition, OMa-2005 and OMb-2006 Addenda in lieu of the earlier ASME B&PV Code, Section XI.

2.0 REGULATORY EVALUATION

The regulations in 10 CFR 50.55a(g), "Inservice Inspection Requirements," require, in part, that ISI of certain ASME Code Class 1, 2, and 3 components (including supports) be performed at

Enclosure

120-month (10-year), ISI program intervals, in accordance with the specified ASME Code and applicable addenda incorporated by reference in the regulations. Snubbers are part of supports. In accordance with 10 CFR 50.55a(g)(4)(ii), licensees are required to comply with the requirements of the latest edition and addenda of the ASME Code incorporated by reference in the regulations 12 months prior to the start of each 120-month ISI program interval. In accordance with 10 CFR 50.55a(g)(iv), ISI of components (including supports) may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in 10 CFR 50.55a(b), subject to NRC approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions and addenda are met. NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004 (ADAMS Accession No. ML042090436), provides guidance for use of later code editions.

### 3.0 TECHNICAL EVALUATION

#### 3.1 ASME Code Component Affected (as stated by the licensee)

All seismic restraints (snubbers) in San Onofre Nuclear Generating Station (SONGS) Unit 2 and Unit 3 within the scope described in ASME OM Code, Subsection ISTA-1100(c).

#### 3.2 Applicable Code Requirement (as stated by the licensee)

The Inservice Inspection Code of Record for the current 10 Year ISI Interval at SONGS, Unit 2 and Unit 3 is ASME B&PV Code – Section XI, 1995 Edition with 1996 Addenda. In accordance with Table IWA-1600-1 of the ISI Code of Record and 10 CFR 50.55a(b)(2)(vii), the Code of Record for the snubbers is the ASME/ANSI OM 4, 1987 Edition with OMa-1988 Addenda.

#### 3.3 Duration of Proposed Alternative (as stated by the licensee)

The duration of this request is the remainder of the 3<sup>rd</sup> Ten Year ISI Interval (which ends August 17, 2013) and the 4<sup>th</sup> Ten Year IST Interval for SONGS Unit 2 and Unit 3 (which will begin on August 18, 2013).

#### 3.4 Proposed Subsequent Code Edition and Addenda (as stated by the licensee)

The proposed subsequent Code edition and addenda is the ASME OM Code 2004 Edition with OMa-2005 and OMb-2006 Addenda, Federal Register notice 76FR36232. In accordance with 10 CFR 50.55a(b)(3)(v)(B), Federal Register notice 75FR24324, the particular section of the subsequent Code applicable to snubbers is Subsection ISTD with the support of subsection ISTA for General Requirements. The significant changes and improvements between the current Code of record and the subsequent Code are (1) testing is more performance based and (2) test plans rely on distinct test plan groups based on predetermined attributes.

SONGS is prepared to transition the Snubber Program out of the Licensee Controlled Specifications (LCS) to the ASME OM IST Code, Subsection ISTD in accordance with 10 CFR 50.55a(b)(3)(v)(B) and begin the use of the subsequent Code Edition and Addenda upon NRC approval of this request. The proposed edition and Addenda of the OM Code will apply to the Snubber Program for the remainder of the 3<sup>rd</sup> Ten Year Interval and for the 4<sup>th</sup> 10 Year Interval. With the use of ASME OM Code 2004 Edition with OMa-2005 and OMb-2006 Addenda, snubbers will no longer follow requirements of the ASME BPV Code, Section XI.

### 3.5 NRC Staff Evaluation

The regulations in 10 CFR 50.55a(g)(4)(iv) state:

Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met.

The 2004 Edition through 2005 and 2006 Addenda of the ASME OM Code were incorporated by reference into 10 CFR 50.55a(b)(3) in a final rule dated June 21, 2011 (*Federal Register*, Volume 76, No. 119, page 36232-36279). This is currently the latest edition and addenda of the ASME OM Code approved for use by the NRC, subject to the conditions in 10 CFR 50.55a(b)(3)(i), (ii), (v), and (vi). The SONGS, Units 2 and 3, snubber program is required to comply with the 1995 Edition with 1996 Addenda of the ASME B&PV Code, Section XI for the current, third, 10-year ISI interval. The regulations in 10 CFR 50.55a(b)(3)(v)(A) allow the use of the ASME OM Code for snubber inservice examination and testing in lieu of the ASME B&PV Code, Section XI requirements. When using 2006 Addenda and later editions or addenda of the ASME B&PV Code, Section XI, 10 CFR 50.55a(b)(3)(v)(B) requires the use of the ASME OM Code, because snubbers requirements have been deleted from the ASME B&PV Code, Section XI.

The licensee is proposing to use the 2004 Edition through 2005 and 2006 Addenda of the ASME OM Code for snubber program as the "Code of Record" in lieu of the 1995 Edition with 1996 Addenda of the ASME B&PV Code, Section XI for the SONGS, Units 2 and 3, for the remainder third (current), 10-year interval and next, fourth, 10-year ISI program interval. Per current regulations in 10 CFR 50.55a, the fourth, 10-year interval snubber program at SONGS, Units 2 and 3, must be based ASME OM Code, 2004 Edition with 2005 and 2006 Addenda. Therefore, as described in Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," and pursuant to 50.55a(g)(4)(iv), the NRC staff concludes that the usage of 2004 Edition with 2005 and 2006 Addenda of the ASME OM Code is acceptable for both the third and fourth, 10-year ISI intervals, subject to the conditions 10 CFR 50.55a(b)(3)(i), (ii), (v), and (vi).

#### 4.0 CONCLUSION

Based on the above, the NRC staff concludes that Request ISI-3-35, to apply the requirements of Subsection ISTD (in its entirety) and the related requirements of Subsection ISTA, using the 2004 Edition of ASME OM Code, with 2005 and 2006 Addenda, for the program to examine and test snubbers at SONGS, Units 2 and 3, is acceptable. These requirements will be used in lieu of the corresponding requirements in the 1995 Edition with 1996 Addenda of ASME B&PV Code, Section XI. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(g)(4)(iv), and is in compliance with the ASME OM Code requirements. Therefore, the NRC staff approves Request ISI-3-35 for the remainder of third 10-year ISI interval which will end on August 27, 2012, and the fourth 10-year IST interval, which is scheduled to end on August 17, 2023.

All other ASME Code, Section XI requirements for which an alternative was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: Gurjendra S. Bedi

Date: July 20, 2012

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If you have any questions, please contact Kaly Kalyanam at 301-415-1480 or [kaly.kalyanam@nrc.gov](mailto:kaly.kalyanam@nrc.gov).

Sincerely,

***/RA by FLyon for/***

Michael T. Markley, Chief  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure:  
Safety Evaluation

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