



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

October 15, 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 –
CORRECTION TO RELIEF 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 July 20, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12179A492), the U.S. Nuclear Regulatory Commission (NRC) staff approved Relief Request ISI-3-35 for the remainder of third 10-year inservice inspection (ISI) and fourth 10-year inservice testing (IST) intervals for the San Onofre Nuclear Generating Station, Units 2 and 3. Relief Request ISI-3-35 approved the use of subsections ISTA and ISTD of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) for ISI items subject to the limitations and modifications listed in Title 10 of the *Code of Federal Regulations* paragraph 50.55a(b).

An editorial error was discovered on the cover letter dated July 20, 2012, and the first page of the associated safety evaluation (SE). In the second paragraph of the cover letter, the fourth 10-year IST interval refers to the ASME Boiler and Pressure Vessel (B&PV) Code 2005 Addenda through 2008a Edition. The correct code for the fourth 10-year IST interval is the ASME OM Code 2004 Edition with OMa-2005 and OMb-2006 Addenda. This error was also corrected in the second paragraph of page 1 of the SE.

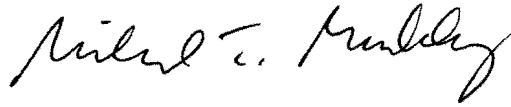
Corrected copies of page 1 of the cover letter dated July 20, 2012, and page 1 of the associated SE are enclosed, with revision bars indicating areas of change. This correction does not change any of the conclusions in the SE associated with the relief request. We apologize if this error has caused you any inconvenience.

P. Dietrich

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If you have any questions regarding this matter, please contact Randy Hall, Senior Project Manager, at 301-415-4032.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Markley". The signature is written in a cursive style with a large, sweeping "M" and a long, trailing "y".

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:
Corrected cover letter and SE page 1

cc w/encl: Distribution via Listserv

ENCLOSURE

San Onofre Nuclear Generating Station, Units 2 and 3
Corrected Pages for Relief Request ISI-3-35 dated July 20, 2012



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. The fourth 10-year IST interval will use the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) 2004 Edition with OMa-2005 and OMb-2006 Addenda. 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 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 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



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. 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 the remainder of the third ISI interval and the fourth 10-year IST interval, 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

P. Dietrich

- 2 -

If you have any questions regarding this matter, please contact Randy Hall, Senior Project Manager, at 301-415-4032.

Sincerely,

/RA/

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:
Corrected cover letter and SE page 1

cc w/encl: Distribution via Listserv

DISTRIBUTION:

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ADAMS Accession No. ML12250A642

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA	NRR/DORL/LPL4/BC
NAME	AWang	JRHall	JBurkhardt	MMarkley
DATE	10/10/12	10/12/12	10/4/12	10/15/12

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