

November 15, 2012

10 CFR 50.55a

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject: Docket Nos. 50-361 and 50-362  
Response to Request for Additional Information Regarding  
Third Ten-Year In-service Inspection (ISI) Interval  
Relief Request: ISI-3-36, Pressure Testing Boundary  
San Onofre Nuclear Generating Station, Units 2 and 3**

Reference: Letter from R. St Onge (SCE) to the U.S. Nuclear Regulatory Commission (NRC) dated April 17, 2012; Subject: Docket Nos. 50-361 and 50-362, Third Ten-Year Inservice Inspection (ISI) Interval, Relief Request: ISI-3-36, Pressure Testing Boundary (ADAMS Accession Number ML12109A079)

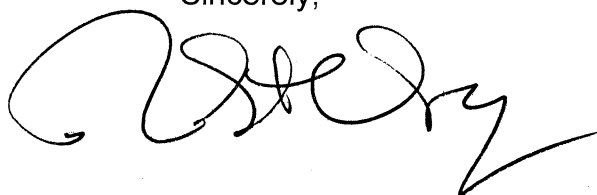
Dear Sir or Madam,

By letter dated April 17, 2012 (Reference) Southern California Edison (SCE) submitted Third Ten-Year Inservice Inspection (ISI) Interval Relief Request ISI-3-36 in accordance with 10 CFR 50.55a(a)(3)(ii). SCE requested NRC approval by August 17, 2013, the scheduled expiration date of the Third Ten-Year ISI Interval.

By e-mail dated October 23, 2012, the NRC requested additional information in support of review of Relief Request ISI-3-36. Response to the NRC's request for additional information is provided in the Enclosure to this letter.

If you have any questions or require additional information, please contact Ms. Linda T. Conklin, Licensing Manager, at (949) 368-9443. There are no new regulatory commitments contained in this letter

Sincerely,



Enclosure: as stated

cc: E. E. Collins, Regional Administrator, NRC Region IV  
R. Hall, NRC Project Manager, San Onofre Units 2 and 3  
B. Benney, NRC Project Manager, San Onofre Units 2 and 3  
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

**Enclosure**

**Response to Request for Additional Information (RAI)  
Regarding:**

**Request ISI-3-36**

**10 CFR 50.55a(a)(3)(ii) for Relief for Hardship or Unusual Difficulty Without  
Compensating Increase In Level of Quality or Safety**

## RESPONSE TO NRC RAI REGARDING SCE RELIEF REQUEST ISI-3-36

### Pressure Testing Boundary

The Nuclear Regulatory Commission (NRC) staff provided a question regarding Southern California Edison's (SCE's) proposed Third Ten-Year Inservice Inspection Interval Relief Request ISI-3-36 by e-mail dated October 23, 2012.

#### **NRC Question 1:**

In section 4 of the request you state that, "meeting those requirements involves considerable time to establish and return from the required temporary configuration resulting in both risk of delaying normal plant startup following a refueling outage and an increase in personnel radiation exposure and safety concern." Please detail the safety concern caused by erecting scaffolding and changing valve positions to conduct the pressure test as required by table IWB-2500-1.

#### **SCE Response:**

The safety concern mentioned in our letter refers to "industrial safety." The sentence should have read, "Meeting those requirements involves considerable time to establish and return from the required temporary configuration resulting in both risk of delaying normal plant startup following a refueling outage and an increase in personnel radiation exposure and industrial safety".

There is an inherent industrial safety risk when performing work in congested areas in close proximity to valves and piping at increased pressures and temperatures. The VT-2 test is performed during startup with RCS pressure at or above 2250 psia and 280 degrees Fahrenheit. Personnel in the area during the test include operations personnel, VT-2 examiners, and personnel erecting and dismantling the scaffolding.

For the reasons stated in the referenced letter as well as the increased industrial safety risk, SCE requests relief because compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Also in the referenced letter the VT-2 pressure units were given in psig but should have been psia.