

November 29, 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
ASME Code Update for the Fourth Ten-Year Interval, Inservice
Testing (IST) Program, IST-4-P-2 (Enclosure 2)
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 August 06, 2012; Subject: Docket Nos.
50-361 and 50-362, ASME Code Update for the Fourth Ten-Year
Interval, Inservice Testing Program
San Onofre Nuclear Generating Station Units 2 and 3

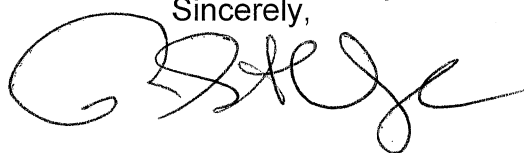
Dear Sir or Madam,

By letter dated August 06, 2012 (Reference) Southern California Edison (SCE) submitted the ASME Code Update for the Fourth Ten-Year Interval Inservice Testing (IST) Program in accordance with 10 CFR 50.55a. SCE requested NRC approval by August 18, 2013, to support the fourth ten-year interval.

By e-mail dated November 08, 2012, the NRC requested additional information in support of review of ASME Code Update for the Fourth Ten-Year Interval IST Program, IST-4-P-2 (Enclosure 2). Response to the NRC's request for additional information is provided in the Enclosure to this letter.

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

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:**

**IST-4-P-2
(Enclosure 2)**

**10 CFR 50.55a(a)(3)(i) Alternative Provides Acceptable Level of
Quality and Safety**

RESPONSE TO NRC RAI REGARDING SCE IST-4-P-2

Code Update Fourth Ten-Year Interval Inservice Testing (IST) Program

NRC Question 1:

RAI IST-4-P-2-1

State the type of pump (horizontal centrifugal, vertical line shaft, positive displacement, etc.) for each pump listed in the request referenced above.

SCE Response:

Below are Tables 1 and 2 from the original IST-4-P-2 (Enclosure 2) revised with a, "Pump Type" column inserted between the Pump and Parameter columns, with the type of pump for each listed in the request referenced above.

TABLE 1

Pump	Pump Type	Parameter	Instrument	Reference Value ¹	Instr. Range (Range/Ref Value)	Error Permitted by Code ²	As Installed Accuracy at Full Scale (error at full scale)
Emergency Chilled Water Pumps							
P160 P162	Horiz. Cent.	Suction Pressure	PI-9883B PI-9883A	30 psig	0-160 (5.3)	1.8 psig	0.5% (0.8 psig)
Component Cooling Water Seismic Make-up Pumps							
P101 8 P101 9	Horiz. Cent.	Suction Pressure	PI-6566 PI-6565	8.2 psig	0-30 (3.7)	0.49 psig	0.5% (0.15 psig)
Diesel Generator Fuel Oil Transfer Pumps							
P093 P094 P095 P096	Vert. Line Shaft	Discharge Pressure	PI-5973 PI-5975 PI-5976 PI-5974	15.9 psig	0-60 (3.8)	0.95 psig	0.5% (0.3 psig)

¹Reference values are based on historical data for like pumps P160, 2P1019, 2P093. Other pumps in groups are similar. Future values may be slightly different, but overall Code accuracy requirements would be met or exceeded under all conditions under which an IST would be performed.

²The information in this column represents the gauge error permitted by the Code (3 times reference value X Code required accuracy of 2%, for Group A or B Testing).

TABLE 2

Pump	Pump Type	Parameter	Inst.	Nominal Quarterly Reference ³	Worst Case Refueling Reference ⁴	Instr. Range (Range/Ref. Value)	Error Permitted by Code ⁵	As Installed Accuracy at Full Scale (error at full scale)
Containment Spray System Pumps								
P012 P013	Vert. Cent.	Suction Pressure	PI-9087 PI-9085	27.6 psig	13.7 psig	0-75 (5.5)	0.206 psig	0.25% (0.19 psig)
Low Pressure Safety Injection Pumps								
P015 P016	Vert. Cent.	Suction Pressure	PI-9081 PI-9083	31.5 psig	17.6 psig	0-60 (3.4)	0.264 psig	0.25% (0.15 psig)
P015 P016	Vert. Cent.	Discharge Pressure	PI-9082 PI-9084	173 psig	159 psig	0-500 (3.1)	2.4 psig	0.25% (1.25 psig)

³Reference values are based on historical data for like Unit 2 pumps P012 and P015. Future values may be slightly different, but overall Code accuracy requirements would be met or exceeded under all conditions under which an IST would be performed.

⁴For the worst case refueling reference, the gauges read below the Code required range (i.e., less than 1/3 of full scale)

⁵The information in this column represents the gauge error permitted by the Code (3 times reference worst case refueling value X Code required accuracy of 0.5%, during Comprehensive Testing).