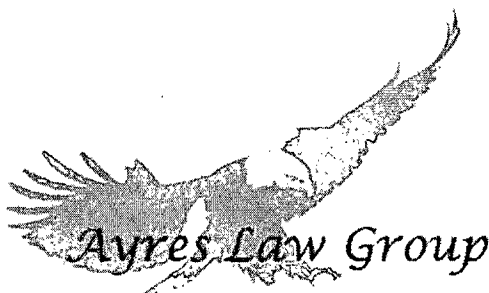


RAS: FFF-3

DOCKETED

December 4, 2012 (3:35 p.m.)

USNRC  
Office of the Secretary  
Rulemakings and  
Adjudications Staff  
Docket Nos. 50-361/362-CAL



December 4, 2012

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Re: Proposed Briefing Schedule and Request for Documents (ASLBP No. 13-924-01-CAL-BD01)

Dear Counsel:

As directed by the Atomic Safety and Licensing Board ("Board") in our conference call on December 3, 2012, I am writing to discuss initial procedural issues with respect to the proceeding ordered by the Nuclear Regulatory Commission in its November 8, 2012 order (CLI-12-20). In the interest of expeditious and thorough consideration of this matter, Friends of the Earth would like to make two requests of your client, Southern California Edison ("Licensee").

First, the Board made clear on the call that additional documents must be disclosed in order to fully understand the safety significance of the Licensee's analysis in support of its response to the Confirmatory Action Letter (CAL) issued March 27, 2012. The CAL requires the Licensee to demonstrate an understanding of the causes of tube wear in the steam generators at San Onofre and nuclear safety issues arising from the proposed restart. The Licensee has relied upon the Operational Assessments (OA) from their consultants to advise on the tube wear and the length of the period to inspection following restart. The OA's rely upon analysis referenced in the CAL. The Licensee relies upon these OA's to make their case that they understand the cause of the tube wear.

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SECY-043

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We attach a list to this letter (Attachment A) that catalogues the relevant documents that either have not yet been disclosed or are so redacted as to render the document impenetrable. **We ask that the Licensee make these documents available to the parties so that the question of whether the CAL process is a *de facto* license amendment proceeding can be adequately briefed.**

Second, Friends of the Earth requests the Licensee's assent to a briefing schedule that takes into account the time it will take the Licensee to provide access to the documents in Attachment A and to provide a short time for all parties to review and analyze them in a meaningful way. Thus, **we propose a three week period for review of documents *after* all parties receive all of the documents in the attached list prior to starting the briefing schedule itself.** For example, if the documents are made available by December 21, 2012, the proposed briefing schedule would be as follows:

January 11, 2013	Review of documents
February 1, 2013	Brief for Petitioner
February 8, 2013	Brief for Amicus
February 22, 2013	Brief for Respondent
February 22, 2013	Brief for NRC Staff
March 1, 2013	Reply brief for Petitioner

This schedule provides the parties with at least a short time to consider all the relevant documents and brief their case without unduly delaying the proceeding.

We would like to discuss these matters further via phone tomorrow, Wednesday, December 5<sup>th</sup>. Please confirm your availability by calling or emailing my office using the information below. Thank you for your immediate attention to this matter.

Sincerely,

/s/ Richard Ayres  
Counsel for Friends of the Earth  
(202) 452-9300  
ayresr@ayreslawgroup.com

Cc: Chief Administrative Judge Roy Hawkens (roy.hawkens@nrc.gov)  
Administrative Judge Anthony J. Baratta (anthony.baratta@nrc.gov)  
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David Roth, NRC, Office of the General Counsel (david.roth@nrc.gov)  
Douglas Porter, Southern California Edison Company (douglas.porter@sce.com)

## ATTACHMENT A

### 1. LIST OF UNAVAILABLE DOCUMENTS AND DOCUMENTS REQUIRING FURTHER CLARIFICATION

ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFER- ENCE	COMMENTS
1	Table 5-1 lists the 8 individual tubes that failed the in-situ pressure tests, giving the individual tube location but fails to provided details of the TTW (or RB/AVB) wear detected for the tubes and if the failure site occurred at a known locality of wear.	SCE, Enclosure 2, Songs Return to Service Report, October 3 2012 - Table 5-1, p10	20	Further details relating TTW site through wall thickness and the location of failure (i.e. at the known TTW site or elsewhere) – particular regard should be given to Tube Locations 106-78, 102-78 and 104-78
2	Refers to evaluation of seismically-induced tube rupture using RSG 3E-088 tube 105-78 when subject to SONGS design basis earthquake (DBE) loading but as for 1) above, fails to identify if tube 105-78 is the worse TTW tube wall reduction case.	SCE, Enclosure 2, Songs Return to Service Report, October 3 2012 - 5.2.1 ¶2	20	Confirmation or otherwise that tube 195-78 is the worst case choice.
3		<i>Root Cause Evaluation, San Onofre Nuclear Generating Station, Condition Report: 201836127, Unit 3 Steam Generator Tube Leak and Tube-to-Tube Wear, Revision 0, 5/7/2012.</i>		Available report seems to be a 'leaked' copy – the full and official version should be accessible.
4		SO23-617-1-M1562 <i>Retainer Bar Tube Wear Report</i>		Could be a duplicate of Mitsubishi's technical evaluation Document SO23-617-1-M1562, Revision 4; if not, please disclose the document.
5		MHI's <i>Thermal &amp; Hydraulic Analysis using FIT-III</i> SO23-617-1-C-683		See SCE Root Cause Evaluation, <i>Ref 201836127 Rev 0, REC May 7 2012</i>
6		Tube Wear of SONGS U3 RSG, <i>Technical Evaluation Report</i> , MHI 3/30/12 SO23-617-M1520 Rev. 1		See SCE Root Cause Evaluation, <i>Ref 201836127 Rev 0, REC May 7 2012</i>
7		SONGS U3 <i>Tube-Tube Wear Orientation Summary</i> , AREVA NP Inc. 3/1/2012		See SCE Root Cause Evaluation, <i>Ref 201836127 Rev 0, REC May 7 2012</i>
8	This is required to understand and assess the value of referring to another unspecified PWR plant to align the projected performance of the Unit 2 RSGs.	<i>Design Comparison SONGS vs. ANO-2 RSGs Lower Shell Assembly Tube Bundle Region</i>		See SCE Root Cause Evaluation, <i>Ref 201836127 Rev 0, REC May 7 2012</i>

ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFERENCE	COMMENTS
9	These documents are required to clarify the ambiguities surrounding reporting of the 1 <sup>st</sup> and 2 <sup>nd</sup> inspections at different times by NRC and SCE.	<i>Special Reports</i> relating to both Units 2 and 3 RSG inspections as required by 10 CFR 5.7.2 c), submitted by SCE and held by Document Control Desk, Washington, D. C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC	1	
10		Unit 3 LER 2012-002, dated May 10, 2012 refers to SG Tube Degradation Indicated by Failed In-situ Pressure Testing as required by 10 CFR 50.73(a)(2)(ii)(A).	1	Refers to a condition which resulted in a principal safety barrier being seriously degraded (i.e., serious SG tube degradation)
11		<i>Letter</i> from Peter T. Dietrich (SCE) to Elmo Collins (USNRC), dated April 20, 2012.	1	Update of Unit 2 RSG Tube Inspection Results
12		<i>SONGS Steam Generator Program (SO23-SG-1)</i>	1	
13		SO23-617-M1068 <i>SONGS Units 2 and 3 Replacement Steam Generator Project NSSS Licensing Topical Report</i>	28	
14		SO23-617-1-M1520 <i>Tube Wear of Unit 3 RSG - Technical Evaluation Report</i>	28	
15		SO23-617-1-D507 Anti-Vibration Bar Assembly SO23-617-1-D540 Anti-Vibration Bar Assembly SO23-617-1-D540 Anti-Vibration Bar Assembly SO23-617-1-D542 Anti-Vibration Bar Assembly SO23-617-1-D796 Anti-Vibration Bar Assembly SO23-617-1-D799 Anti-Vibration Bar Assembly SO23-617-1-D800 Anti-Vibration Bar Assembly SO23-617-1-D801 Anti-Vibration Bar Assembly SO23-617-1-D781 Detail of Retaining Bar	28	
16		SO23-617-1-M1265 Summary Design Report	28	
17		SO23-617-1-C749 <i>Analytical Report of AVB Assembly</i>	28	

ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFERENCE	COMMENTS
18		SO23-617-1-C1106 <i>Thermal and Hydraulic Parametric Calculations</i>	28	
19		SO23-617-1-C683 <i>Three-dimensional Thermal and Hydraulic Analysis (FIT-III Code Analysis)</i>	28	
20		SO23-617-1-C157 <i>Evaluation of Tube vibration</i>	28	
21		SO23-617-1-M1520 <i>Tube Wear of Unit 3 RSG-Technical Evaluation Report</i>	28	
22		SO23-617-1-M1530 <i>Validity of Use of the FIT-III Results during Design</i>	28	
23		SO23-617-1-M1231 <i>Performance Analysis Report</i>	28	
24		SO23-617-1-M1029 <i>Eddy Current Examination Report – Rotating Coil Inspection for U-bend Portion During Manufacturing Tubing (Steam Generator 2E088)</i>	28	
25		SO23-617-1-M1255 <i>Eddy Current Examination Report – Rotating Coil Inspection for U-bend Portion</i>	28	
26		KAS-20050201 <i>FIT-III Code Validation Report</i>	28	
27		Attachment 12 <i>Meeting Minutes of Design Review and Technical Meeting with MHI on Retainer Bar Design</i> September 12-15, 2006	28	
28		SONGS RSG Project Meeting Notes October 23, 2009	28	
29	This is only reported as an NRC close-out report and the full records of the alarms and accelerometer outputs are likely to be useful in identifying the source of the 'noise' that triggered the alarms.	<i>Nuclear Notification</i> NN 201818719, January 20 2012	32	Record of following evaluation required.

ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFER-ENCE	COMMENTS
30		<i>Flow-Induced Vibration and Tube Wear Analysis of the San Onofre Nuclear Generating Station Unit 2 Replacement Steam Generators Supporting Restart</i> , Westinghouse Report LTR-SGDA-12-36, Revision 1, September 13, 2012.		
31		<i>San Onofre Nuclear Generating Station Units 2 and 3 Replacement Steam Generators Evaluation of Stability Ratio for Return to Service</i> , Mitsubishi Heavy Industries Ltd., L5-04GA567, Revision 4, July 21, 2012.		
32		<i>SONGS Unit 2 Tube-to-tube Wear Indication Data</i> Westinghouse letter LTR-SGMP-12-80, October 2, 2012.		

## 2. LIST OF DOCUMENTS UNINTELLIGIBLE BECAUSE OF REDACTION

ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFER-ENCE	COMMENTS
33		Attachment 6 – Appendix D: Operational Assessment of Wear Indications In the U-bend Region of San Onofre Unit 2 Replacement Steam Generators		
34	This report is important to the understanding of the retainer bar interactions with the 1 <sup>st</sup> and 2 <sup>nd</sup> tube rows in the non-FEI (R<1) activity regimes.	MHI report, <i>Retainer Bar Tube Wear Report</i> , L5-04GA561		
35	This report might provide a better understanding of the MHI reasoning and reliability of the siting of the preventative plugging zones which is so crucial to the management of FEI in Unit 2 under restart power levels.	MHI report, <i>Case study of the input parameters and tube plugging impact on internal SG thermal hydraulic parameters</i> , L5-04GA566		

ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFER- ENCE	COMMENTS
36	Ditto - throughout the SCE commissioned OAs there is little discussion or demonstration of i) the accuracy of predicting high FEI activity zones and ii) if tube motions can be induced at FEI activity below the critical velocity ( $R < 1$ ).	MHI report, <i>Evaluation of Stability Ratio for Return to Service</i> , L5-04GA567		
37		MHI report, <i>Screening Criteria for Susceptibility to In-Plane Tube Motion</i> , L5-04GA571		
38		<i>Simulation of Tube-to-Tube Impact</i> , Phase 2 Report, June 2012 (AREVA NP Document 38-9191195-000).		
39		AREVA Document 51-9182833-002, SONGS 2C17 Outage – Steam Generator Operational Assessment (SONGS Document 1814-AU651-M0144 Rev. 1).		
40		SONGS Document 90200, Rev. 0. <i>Average and Maximum Thermal-Hydraulic Parameter Comparisons between Songs RSGs and Similar Plants.</i>		Unredacted document may be available under a different title. If so, please disclose the name and location of the document.
41		SONGS Document SO23-617-1-M1523 Rev. 5, <i>Replacement Steam Generators, Evaluation of Stability Ratio for Return to Service</i> (MHI Document L5-04GA567 Rev. 6).		
42		AREVA NP Document 51-9182368-002, SONGS 2C17 Steam Generator Condition Monitoring Report.		
43		SONGS Document SO23-617-1-M1532 Rev. 2, <i>Analytical Evaluations for Operational Assessment</i> (MHI Document L5-04GA585 Rev. 2).		
44		AREVA NP Document 32-9187024-000, SONGS Steam Generator Probability of Fluid Elastic Instability Calculation.		



ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFERENCE	COMMENTS
45		SONGS Document 1814-AA086-M0189 Rev. 2, Westinghouse Report LTR-SGDA-12-36 Rev. 0, Flow-Induced Vibration and Tube Wear Analysis of the San Onofre Nuclear Generating Station Unit 2 Replacement Steam Generators Supporting Restart.		
46		AREVA NP Document 51-9188725-000, SONGS U2C17 and U3F16B AVB Gap and		
47		SONGS Document SO23-617-1-M1520 Rev. 6, Tube Wear of Unit-3 RSG – Technical Evaluation Report (MHI Document L5-04GA564 Rev. 8).		
48		AREVA NP Document 51-9181604-000, SONGS Unit 2 Cycle-17 and 2012 Return to Service Technical Summary Steam Generator Eddy Current Inspection.		
49		<i>AREVA NP Document 51-9180143-001, SONGS Unit 3 February 2012 Leaker Outage – Steam Generator Condition Monitoring Report (SONGS Document 1814-AU651-M0143 Rev. 1).</i>		
50	This drawing should provide full details and material specifications for the AVB restraint assembly, including details of the retainer bar to enable the MHI claim that it is the RB that vibrates and is the source of tube wear in 12 of the 24 AVB assembly localities.	<i>SONGS Drawing SO23-617-1-D542 Rev. 9, San Onofre Nuclear Generating Station Unit 2 &amp; 3 Replacement Steam Generators – Design Drawing – Anti-Vibration Bar Assembly 7/9 (MHI Drawing L5-04FU117 Rev. 9).</i>		
51	This report is heavily redacted with supporting analysis and data – much of the redaction seems beyond that required for preserving commercial confidentiality.	<i>Mitsubishi's technical evaluation Document SO23-617-1-M1562, Revision 4</i>	32	

ITEM	DESCRIPTION	DOCUMENT REFERENCE	3218-A1 REFER- ENCE	COMMENTS
52	This report is heavily redacted with supporting analysis and data – much of the redaction seems beyond that required for preserving commercial confidentiality.	<i>Document SO23-617-1-C749, Analytical Report of Anti-vibration Bar Assembly</i>	32	
53		<i>Certified Design Specification for SONGS replacement steam generators, Document SO23-617-01, Revision 4</i>		
54		<i>Document SO23-617-1-C157, Evaluation of Tube Vibration, Revision 3</i>		
55	This report is heavily redacted with supporting analysis and data – much of the redaction would seem to beyond that required for preserving commercial confidentiality.	Attachment 4: MHI Document L5-04GA564 - Tube Wear of Unit-3 RSG Technical Evaluation Report, Mitsubishi Heavy Industries SO23-617-1-M1538 Rev 0	1	It is not clear from the SCE Enclosure 2 explanation that the NRC copy of the MHI Attachment 4 will be similarly redacted.  Important aspects hidden by the redaction are: * Demonstration of a full understanding of the FEI-invoked tube wear; * How the dimensional differences between Unit 2 and Unit 3, as manufactured, influence and relate to the differing degrees and (some) locations of fretting wear differences
56	This report is heavily redacted with supporting analysis and data – much of the redaction seems beyond that required for preserving commercial confidentiality.	<i>SCE Accelerometer Data Review Associated File to SO23-617-1-M1508 Rev 0</i>	32	See SCE Root Cause Evaluation, <i>Ref 201836127 Rev 0, REC May 7 2012</i>
57	This report is heavily redacted with supporting analysis and data – much of the redaction seems beyond that required for preserving commercial confidentiality.	NRC URI 05000362/2012007-02, <i>Evaluation of Unit 3 Vibration and Loose Parts Monitoring System Alarms.</i>	32	
58	This report is heavily redacted with supporting analysis and data – much of the redaction seems beyond that required for preserving commercial confidentiality.	<i>SO23-617-1-M1520 Tube Wear of Unit 3 RSG - Technical Evaluation Report</i>	32	
59	This report is heavily redacted with supporting analysis and data – much of the redaction seems beyond that required for preserving commercial confidentiality.	MHI report, <i>Retainer Bar Tube Wear Report</i> , L5-04GA561 the latest revision	1	

60	This report is heavily redacted with supporting analysis and data – much of the redaction seems beyond that required for preserving commercial confidentiality.	Attachment 12 <i>Meeting Minutes of Design Review and Technical Meeting with MHI on Retainer Bar Design</i> September 12-15, 2006 28		
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## Docket, Hearing

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**From:** Jessica L. Olson [olsonj@ayreslawgroup.com]  
**Sent:** Tuesday, December 04, 2012 3:35 PM  
**To:** pbessette@morganlewis.com; ksutton@morganlewis.com; sburdick@morganlewis.com; sfrantz@morganlewis.com  
**Cc:** Hawkens, Roy; Baratta, Anthony; Arnold, Gary; Docket, Hearing; Roth(OGC), David; douglas.porter@sce.com  
**Subject:** Request to discuss procedural issues in San Onofre ASLB Proceeding (No. 13-924-01-CAL-BD01)  
**Attachments:** 12-12-04 Letter from FOE to SCE re document disclosure and schedule.pdf; ATT00002.htm  
**Importance:** High

Dear Counsel-

Please see the attached letter. We look forward to speaking with you.

Regards,  
Jessica Olson  
Counsel for Friends of the Earth