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 AUTH. NAME: AUTHOR AFFILIATION
 MEDFORD, M.O. Southern California Edison Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Responds to 841212 request for addl info re consistency between inservice insp interval start dates & ASME Boiler & Pressure Vessel Code. Units 1 & 2 start dates were 830818 & 840401, respectively.

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Southern California Edison Company

P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

M. O. MEDFORD
MANAGER, NUCLEAR LICENSING

TELEPHONE
(818) 302-1749

October 25, 1985

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

- References:
1. December 12, 1984 letter from George W. Knighton (NRC) to Kenneth P. Baskin (SCE), Subject: Request for Additional Information About Inservice Inspection Program
 2. May 22, 1985 letter from M. O. Medford (SCE) to George W. Knighton (NRC), Subject: Response to Reference 1

The purpose of this letter is to respond to NRC questions and a request concerning the consistency between the inservice inspection (ISI) interval start dates and ASME Boiler and Pressure Vessel Code edition to be used for the ISI programs at San Onofre Units 2 and 3. During a telephone conversation concerning References 1 and 2 above on September 23, 1985 between your Messrs. H. Rood and H. Shaw, NRC consultants G. Freund and K. House, and Messrs. D. Mercurio and J. Boardman of SCE, the NRC requested that SCE establish a common ISI interval start date for Units 2 and 3, and further stated that establishing a common interval start date prior to January 1984 would be a condition for the NRC to accept the use of the 1977 Edition of the ASME Boiler and Pressure Vessel Code with Addenda through Summer 1979 (1977/Summer 1979 Code) for both San Onofre Units 2 and 3.

To provide for consistency in the ISI programs, SCE has been using the 1977/Summer 1979 Code for both Units 2 and 3. SCE considers the 1977/Summer 1979 Code to be appropriate based on the 10 CFR 50.55a(g)(4)(i) requirement that inservice examinations shall comply with the latest edition and addenda of the ASME Code in effect "12 months prior to the date of issuance of the operating license." The low power operating license dates for Units 2 and 3 were February 16, 1982 and November 15, 1982, respectively.

In accordance with Subarticle IWA-2400, subparagraph b of Section XI of the ASME Code, the inspection interval start dates have been August 18, 1983 and April 1, 1984 for Units 2 and 3, respectively, which are the commercial operation dates.

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Mr. G. W. Knighton

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Considering the above, SCE has now completed evaluating the reasonableness and feasibility of the NRC request to establish a common ISI interval start date for San Onofre Units 2 and 3. It has been concluded that this NRC request can be accommodated, and SCE hereby commits to using August 18, 1983, the current Unit 2 ISI interval start date, as the ISI interval start date for both Units 2 and 3. The 1977/Summer 1979 Code will continue to be used for both units.

Please let me know if you have any questions or would like to discuss this matter further.

Very truly yours,



cc: H. Rood, NRC (San Onofre 2/3 Project Manager)