

November 14, 1994

Mr. Harold B. Ray
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Irvine Operations Center
23 Parker Street
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Mr. Edwin A. Guiles
Vice President
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101 Ash Street
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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE SECOND 10-YEAR
INTERVAL INSERVICE INSPECTION PROGRAM FOR SAN ONOFRE
NUCLEAR GENERATING STATION, UNITS 2 AND 3 (TAC NOS. M88906 AND
M88907)

Gentlemen:

The staff and its consultants, Idaho National Engineering Laboratory (INEL), are reviewing and evaluating the second ten-year interval inservice inspection Program Plan and the associated requests for relief from the ASME B&PV Code, Section XI requirements for San Onofre Nuclear Station, Units 2 and 3. Additional information is required in order for the staff to complete its review.

The staff requests that a response to the attached list of questions be provided within sixty days to meet the staff's inservice inspection program plan review schedule. In addition, to expedite the review process, please send a copy of your response to the NRC's contractor, INEL, at the following address:

Boyd W. Brown
INEL Research Center
2151 North Boulevard
P.O. Box 1625
Idaho Falls, Idaho 83415-220

Sincerely,
ORIGINAL SIGNED BY:
Mel B. Fields, Project Manager
Project Directorate IV-2
Division of Reactor Projects III\IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure: Request for Additional
Information

cc w/encl: See next page

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Messrs. Ray and Guiles
Southern California Edison Company

San Onofre Nuclear Generating Station
Unit Nos. 2 and 3

cc:

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

SOUTHERN CALIFORNIA EDISON COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NUMBERS: 50-361 AND 50-362

MATERIALS ENGINEERING BRANCH

DIVISION OF ENGINEERING

Request for Additional Information - Second 10-Year Interval Inservice
Inspection Program

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the successive 120-month inspection interval comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of a successive 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein and subject to Nuclear Regulatory Commission (NRC) approval. The licensee, Southern California Edison Company, has prepared the *San Onofre Nuclear Generating Station, Units 2 and 3, Second 10-Year Interval Inservice Inspection (ISI) Program* to meet the requirements of the 1989 Edition of Section XI of the ASME Code. As required by 10 CFR 50.55(g)(5), if the licensee determines that certain Code examination requirements are impractical and requests relief, the licensee shall submit information to the NRC to support that determination.

The staff has reviewed the available information in the *San Onofre Nuclear Generating Station, Units 2 and 3, Second 10-Year Interval ISI Program*, submitted October 4, 1993.

2. Additional Information Required

Based on the above review, the staff has concluded that the following information and/or clarification is required to complete the review of the ISI Program.

- A. The title pages, approval pages, and Sections 1 through 10 appear to be original issue. Sections 11 through 13 appear to be Revision 1. Section 6 contains a review of Revision 0 and Revision 1. The transmittal letter does not include a revision number nor does the program contain a "List of Revisions". Verify that the latest revision applicable for each section has been transmitted.
- B. Paragraph 1.5.6 of the program implies that the licensee is using every approved Code Case. If this is in error, please list all approved Code Cases that are to be used.
- C. Paragraph 2.1.3 of the program states that work started in the first interval and completed in the second interval will follow the Repair and Replacement Plan for the first interval. Provide clarification regarding the intent of this statement.
- D. Paragraph 2.1.9.3 of the program states that a system inservice test will be performed instead of a hydrostatic test if the hydrostatic test conditions conflict with limitations contained in the Technical Specifications. Pursuant to 10 CFR 50.55a(g)(5)ii, if such a conflict arises an amendment to the Technical Specifications shall be submitted. If the Technical Specifications are not amended, requests for relief specific to the system(s) affected are required. Provide technical discussion regarding the testing situations this paragraph applies to and why one of the two options is not required.
- E. Paragraph 2.4.11 of the program states that the piping weld examinations under Examination Category B-J may include the inspection areas required by Table WB-2500-1, Examination Category B-J, Note 1. This should not be considered an option. Verify that all the required examination areas of Table IWB-2500-1, Examination Category B-J, Note 1, are included for examination or provide technical justification for not meeting the Code requirement.
- F. Paragraph 2.4.13 of the program states that the piping weld examinations under category B-F may include all dissimilar metal welds. This should not be considered an option. Verify that all the required examination areas of Table IWB-2500-1, Examination Category B-F, are included for examination or provide technical justification for not meeting the Code requirement.

- G. Paragraph 2.6.5 of the program states "For portions of some systems a substitute test to the system hydrostatic test may be performed at or near the end of the ten year inspection interval and is defined in Section 3.5.2." Section 3.5.2 was unavailable to the staff. Provide this section, any other section of the program plan that has not been included, or any renumbering scheme that was used in Revision 1.
- H. Paragraph 2.1.10 of the program states that relief requests from the first and second intervals have been incorporated into the plan as substitute examinations, tests, or repairs. The proposed method lacks sufficient information to evaluate the acceptability of alternatives. Examples of insufficient information include: Alternate Examination 2.9.2, which does not contain a basis for the alternative examination, and Substitute Examination 3.2.2.1, which does not include the percent coverage attainable for the examination. Where Code requirements are not being met, the licensee shall submit requests for relief for staff review pursuant to 10 CFR 50.55a(g)(5). Relief granted for the first 10-year interval cannot be assumed for the second 10-year interval. Please provide the necessary requests for relief for all areas where the Code requirements will not be met for the second 10-year interval. For use as a suggested guide when preparing requests for relief, attached is *Appendix A, "Inservice Inspection: Guidance for Preparing Requests for Relief from Certain Code Requirements Pursuant to 10 CFR 50.55a(g)(5)"*.

The schedule for timely completion of this review requires that the licensee provide, by the requested date, the above requested information and/or clarifications regarding the *Southern California Edison Company, San Onofre Nuclear Generating Station, Units 2 and 3, Second 10-Year Interval Inservice Inspection (ISI) Program, Revision 1*.