



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 15, 1996

Mr. Harold B. Ray
Executive Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P. O. Box 128
San Clemente, California 92674-0128

SUBJECT: INSERVICE INSPECTION RELIEF REQUEST B-14 FOR SAN ONOFRE NUCLEAR
GENERATING STATION UNIT 3 (TAC NO. M88412)

Dear Mr. Ray:

In a letter to the NRC dated December 3, 1993, Southern California Edison (SCE) requested approval of Inservice Inspection (ISI) Relief Request B-14 for San Onofre Nuclear Generating Station, Unit 3. Relief Request B-14 requested relief from performing a hydrostatic test on the steam generator feedwater piping at 1.25 times the lowest steam generator relief valve pressure setting. Hydrostatic testing at 1.25 times the lowest pressure setting is required by the ASME Code Section XI 1977 Edition, Summer 1979 Addenda, Paragraphs IWA-4400(a) and IWC-5222(a). The relief request applied to the replacement of welds that were cut to allow access and repair of indications discovered in the steam generator feedwater piping. The December 3, 1993, letter also identified the alternative examinations that would be performed on the piping to ensure that the structural integrity of the piping would be maintained.

The purpose of this letter is to inform you that Relief Request B-14 was de facto approved when the staff approved the use of Code Case N-416-1 for San Onofre Nuclear Generating Station, Units 2 and 3 in its letter dated January 11, 1995. Code Case N-416-1 allows the piping system to be tested using system pressure test in lieu of the Code required hydrostatic test after weld repairs or installation of replacement items by welding are performed on the system. The staff's approval of Code Case N-416-1 for your facility was based on the information submitted in SCE letter dated December 6, 1994. Part of SCE's reason for requesting approval of Code Case N-416-1 was the need to perform very similar weld repairs of the Unit 2 feedwater piping as was performed on the Unit 3 feedwater piping.

The objective of both Code Case N-416-1 and Relief Request B-14 is to provide relief from the hydrostatic pressure testing requirement specified in Section XI of the ASME Code. The alternative ASME Code requirements specified in Code Case N-416-1 were met or exceeded by the actions performed by SCE in support of Relief Request B-14. Part (a) of Code Case N-416-1 states that nondestructive examination (NDE) shall be performed in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of ASME Code, Section III. The required ASME Code, Section III examination for Class 2 piping welds is radiographic examination for members exceeding 3/16-inch of thickness and magnetic particle or liquid penetrant examination for members that are less than 3/16-inch thick. Both volumetric

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and surface examinations were performed on the welds included in Relief Request B-14 using the methods specified in the ASME Code 1977 Edition, Section XI. After comparing the two sets of examination criteria, the staff concludes that the NDE performed as part of Relief Request B-14 satisfy the requirements of ASME Code, 1992 Edition. Part (b) of Code Case N-416-1 requires that, prior to or immediately upon return to service, a visual examination (VT-2) shall be performed at nominal operating pressure and temperature in conjunction with a system leakage test, in accordance with the requirements of the 1992 Edition of Section XI. This requirement was satisfied for Relief Request B-14 by the performance of a VT-2 examination at Mode 3 pressure and temperature conditions (Mode 3 steam pressure is nominally 100 to 150 psi higher than full load steam pressure). Part (c) of Code Case N-416-1 states that use of this Code Case shall be documented on an NIS-2 Form. The NIS-2 forms were prepared and submitted for the repairs of the feedwater lines as part of the licensee's ISI Summary Report dated March 25, 1994; therefore this requirement of Code Case N-416-1 was also satisfied.

Since Relief Request B-14 is completely covered by the provisions of Code Case N-416-1, the staff has determined that no further review of this issue is required.

This completes our efforts on Tac No. M88412.

Sincerely,

Original Signed By
 William H. Bateman, Director
 Project Directorate IV-2
 Division of Reactor Projects III/IV
 Office of Nuclear Reactor Regulation

Docket No. 50-362

cc: See next page

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