

November 29, 2001

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: **Docket Nos. 50-361 and 50-362,  
Second Ten-Year Interval Inservice Inspection Program  
Reactor Pressure Vessel Examinations  
San Onofre Nuclear Generating Station, Units 2 and 3**

Reference: Letter from D. E. Nunn (SCE) to the Document Control Desk (NRC) dated July 27, 2001; Subject: Docket Nos. 50-361 and 50-362, Second Ten-Year Interval Inservice Inspection Program, Reactor Pressure Vessel Examinations, San Onofre Nuclear Generating Station Units 2 and 3

Gentlemen:

This letter requests NRC approval of Relief Request (RR) B-2-04,, Revision 1, from the ASME Code requirements for the reactor pressure vessel (RPV) examinations for use at San Onofre Nuclear Generating Station Units 2 and 3. This letter replaces the referenced July 27, 2001 letter.

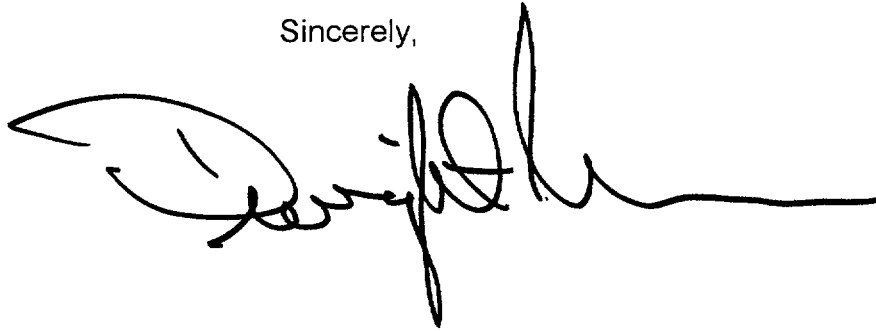
The ASME Section XI Code requires ultrasonic examination of the RPV nozzle inside radius section. This relief request (RR B-2-04, Revision 1) will allow Southern California Edison (SCE) to perform a visual examination similar to the ASME Code Case N-648 approved on December 8, 2000.

This relief request is needed to support the Unit 2 and Unit 3 Cycle 12 refueling outages, which is scheduled to begin in May of 2002 and January 2003, respectively. To support planning activities for the reactor pressure vessel examinations that will be performed during the Cycle 12 refueling outage, your approval by January 1, 2002 would be greatly appreciated.

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If you have any questions or need additional information regarding this matter, please feel free to contact me or Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to be "J. N. Donohew", written over a horizontal line.

Enclosures

cc: E. W. Merschhoff, Regional Administrator, NRC Region IV  
J. N. Donohew, NRC Project Manager, San Onofre Units 2, and 3  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 & 3

Enclosure 1

San Onofre Nuclear Generating Station  
Unit 2 and 3  
Second Ten Year Interval  
In-service Inspection (ISI)  
RELIEF REQUEST RR B-2-04, Revision 1

San Onofre Nuclear Generating Station  
Units 2 and 3  
Second Ten-Year Interval  
ISI RELIEF REQUEST RR B-2-03, Revision 1

COMPONENT DESCRIPTION:

ASME Code Section, XI, Class 1, Examination Category B-D, Item No. B3.100 Nozzle Inside Radius Section in Reactor Pressure Vessels examined at San Onofre Units 2 and 3.

EXAMINATION REQUIREMENTS:

Rules for In-service Inspection of Nuclear Power Plant Components, Section XI, 1989 Edition, with no Addenda, Examination Category B-d Full Penetration Welds of Nozzles in Vessels, Code Item B3.100, Figures IWB-2500-7(a) through (d).

RELIEF REQUESTED:

Pursuant to 10CFR50.55a(a)(3)(i), relief is requested from the Ultrasonic (UT) examination requirement of ASME Section XI Table IWB-2500-1, Examination Category B-D, Item B3.100 to implement an alternative examination method. This relief is applicable to San Onofre Nuclear Generating Stations, Unit 2 and 3. Southern California Edison (SCE) proposes to perform a VT-1, Visual Examination, as an alternative method for the inspection of Reactor Pressure Vessel Nozzle Inner Radii identified in the table above. This method is similar to the examination alternative proposed in ASME Section XI Code Case N-648 (Reference 1). This alternative examination method will be performed during the second inspection interval.

BASIS FOR RELIEF:

The ASME Code Committee approved Code Case N-648, Reference 1, on December 8, 2000. This Code Case was provided as Attachment 1 to the July 27, 2001 letter, Reference 2. According to an NRC memorandum (Reference 3), the staff indicated that an Ultrasonic (UT) examination could be replaced by VT-1 visual examination for the proposed Reactor Pressure Vessel nozzle inspections on the basis that surveillance is maintained and VT-1 visual examination is performed.

The implementation of this relief is also expected to reduce on-vessel examination time by as much as 10 hours, which translates to significant cost savings and reduced personnel radiation exposure.

San Onofre Nuclear Generating Station  
Units 2 and 3  
Second Ten-Year Interval  
ISI RELIEF REQUEST RR B-2-03, Revision 1

ALTERNATIVE EXAMINATION:

In lieu of the UT examination requirements of ASME Section XI Table IWB-2500-1, Examination Category B-D, Item B3.100, a VT-1 visual examination shall be performed. The VT-1 visual examination will be performed using remote video equipment capable of achieving a zoom ratio of 8 - 1 or higher. SCE will utilize the acceptance criteria of Table IWB-3510-3 of the 1998 Edition of Section XI for the examination.

IMPLEMENTATION SCHEDULE:

Second Inservice Inspection Interval.

REFERENCES:

- 1) Code Case N-648 "Alternative Requirements for Inner Radius Examinations of Class 1 Reactor Vessel Nozzles, Section XI, Division 1," Approved December 8, 2000.
- 2) Letter from D. E. Nunn (SCE) to the Document Control Desk (NRC) dated July 27, 2001; Subject: Docket Nos. 50-361 and 50-362, Second Ten-Year Interval Inservice Inspection Program, Reactor Pressure Vessel Examinations, San Onofre Nuclear Generating Station Units 2 and 3
- 3) NRC Internal Memorandum from K. R. Wichman (NRC) to W. H. Bateman (NRC) dated May 25, 2000; Subject: The Third Meeting with the Industry to Discuss the Elimination of RPV Nozzle Inner Radius Inspection (ML003718630).