

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

September 12, 2005

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION (SONGS), UNITS 2 AND 3
RE: CORRECTION TO AMENDMENTS ON CONTAINMENT LEAKAGE RATE
TESTING PROGRAM (TAC NOS. MC3797 AND MC3798)

Dear Mr. Ray:

In its letter dated August 24, 2005, the Nuclear Regulatory Commission (NRC) staff issued Amendment No.198 to Facility Operating License No. NPF-10 and Amendment No.189 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications in response to your application dated June 30, 2004, as supplemented by letters dated December 2, 2004, May 27, and July 18, 2005.

In the safety evaluation (SE) attached to its letter dated August 24, 2005, the NRC staff stated incorrectly that (1) the units are Westinghouse pressurized-water reactors (PWRs) and (2) the next overall verification of the containment leak-tight integrity is proposed to be performed at SONGS Unit 2 by March 20, 2010. The correct statements are the units are Combustion Engineering PWRs and the next overall verification for SONGS Unit 2 is proposed to be performed by March 30, 2010. Neither of these errors were part of the basis for the NRC staff to approve the amendments. To correct these errors, I have enclosed a corrected page 2 of that SE with vertical bars on the right-hand side of the page showing where the corrections were made.

Sincerely,

/RA/

Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure: Page 2 of Safety Evaluation
dated August 24, 2005

cc w/encl: See next page

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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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Enclosure: Page 2 of Safety Evaluation
dated August 24, 2005

cc w/encl: See next page

ACCESSION NO: **ML052440304** NRR-106

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DATE	09/12/05	09/08/05	09/12/05

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method acceptable to the NRC staff for complying with Option B via the use of NEI 94-01 and ANSI/ANS 56.8-1994, subject to applicable regulatory positions documented in RG 1.163.

3.0 TECHNICAL EVALUATION

3.1 Aging Degradation of the Containment Pressure Boundary

SONGS, Units 2 and 3 are Combustion Engineering pressurized-water reactors (PWRs) with large reinforced-concrete primary containment. The containment pressure boundary consists of the steel liner, containment access penetrations, and process piping and electrical penetrations. The integrity of the penetrations is verified through Type B and Type C local leak rate tests (LLRT) as required by 10 CFR Part 50, Appendix J, and the overall integrity of the containment structure is verified through an ILRT. These tests are performed to verify the essentially leak-tight characteristics of the containment structure at the design-basis accident (DBA) pressure. As stated in the licensee's June 30, 2004, TS amendment request, the surveillance frequency for Type A testing in NEI 94-01 is once every 10 years based on an acceptable performance history (i.e., two consecutive periodic Type A tests at least 24 months apart where the calculated performance leakage rate was less than 1.0 La) and consideration of the performance factors in NEI 94-01, Section 11.3. Based on the last two consecutive successful ILRT Type A tests (Unit 2 - March 31, 1995, and October 25, 1991; Unit 3 - September 10, 1995, and March 9, 1992) and the requirements of 10 CFR Part 50, Appendix J, Option B, the current interval for SONGS is once every 10 years for both units. With the requested extension of the ILRT time interval, the licensee proposed that the next overall verification of the containment leak-tight integrity be performed by March 30, 2010, for Unit 2 and by September 9, 2010, for Unit 3.

Because the leak rate testing requirements (ILRT and LLRT) of Option B of 10 CFR Part 50, Appendix J, and the containment inservice inspection (ISI) requirements mandated by 10 CFR 50.55a complement each other in ensuring the leak-tightness and structural integrity of the containment, the staff, based on its review of Type A test interval extension applications from other licensees, identified the following five general areas to evaluate in relation to the ISI of the containment and requested the licensee to provide information in these areas:

1. Since the submittal did not include sufficient description or summary of the containment ISI program being implemented at the plant, the licensee was requested to provide a description of the ISI methods that provides assurance that, in the absence of a containment ILRT for 15 to 20 years, the containment structural and leak-tight integrity will be maintained.
2. IWE-1240 of the American Society of Mechanical Engineers (ASME) Code requires licensees to identify the containment surface areas requiring augmented examinations. The licensee was requested to provide the locations of the steel containment (or concrete containment liner) surfaces that have been identified as requiring augmented examination and a summary of the findings of the examinations performed.
3. For the examination of penetration seals and gaskets, and examination and testing of bolted connections associated with the primary containment pressure boundary (Examination Categories E-D and E-G), the licensee requested relief from the

San Onofre Nuclear Generating Station
Units 2 and 3

cc:

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August 2005

San Onofre Nuclear Generating Station
Units 2 and 3

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