

September 12, 2006

Mr. Richard M. Rosenblum  
Senior Vice President and Chief Nuclear Officer  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3 - REQUEST FOR  
ADDITIONAL INFORMATION ON RELIEF REQUEST ISI-3-24, USE OF  
STRUCTURAL WELD OVERLAY AND ASSOCIATED ALTERNATIVE REPAIR  
TECHNIQUES (TAC NO. MD2469)

Dear Mr. Rosenblum:

By letter dated June 30, 2006, Southern California Edison submitted a request to use alternatives to the requirements of the American Society of Mechanical Engineers Code, Section XI, 1995 Edition through 1996 Addenda, IWA-4000, for repair/replacement activities related to the performance of structural weld overlays at San Onofre Nuclear Generating Station, Unit 3 for the third 10-year inservice inspection (ISI) interval.

After reviewing your request, the U.S. Nuclear Regulatory Commission staff has determined that additional information is required to complete the review. We discussed this with your staff by telephone on September 5, 2006, and they agreed to provide the additional information requested in the enclosure within 30 days from the receipt of the formal request for additional information.

If you have any questions, please contact me at (301) 415-1480.

Sincerely,

**/RA/**

N. Kalyanam, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-362

Enclosure: Request for Additional Information

cc w/encl: See next page

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ACCESSION NO: **ML062490236**

\* No major changes from Staff provided RAI

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DRA/APLA	NRR/LPL4/BC
NAME	NKalyanam	LFeizollahi	KGruss *	DTerao
DATE	9/11/06	9/11/06	8/1/06	9/12/06

OFFICIAL RECORD COPY

REQUEST FOR ADDITIONAL INFORMATION (RAI)

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3

SOUTHERN CALIFORNIA EDISON

DOCKET NO. 50-362

RELIEF REQUEST ISI-3-24

TAC NO. MD2469

1. In your submittal dated June 30, 2006, you state in Section 4.0 that structural weld overlays are proposed for the welds listed. You also state that the thickness of the overlay determined by the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI requirement that "no flaw of depth greater than 75% through-wall is acceptable, along with the consideration of applied loading." Since there is no mention in your submittal whether you are doing full-structural overlays, please clarify whether full-structural overlays are to be performed and that no design/optimized overlays will be implemented.
2. Please indicate what types of nondestructive examinations (NDEs) will be performed prior to the weld overlay installation. If pre-welding NDEs are not to be performed, expand your justification for not performing the NDE prior to welding your overlays.
3. Please discuss your repair strategy as a result of pre-welding NDE. The cover letter indicates that full-structural overlays will be performed as a preemptive application. If a flaw is detected in the weld by NDE prior to a weld overlay, confirm that the weld overlay thickness calculation is based on the worst case flaw.
4. Please identify when the flaw evaluations and shrinkage stress effects analyses required under Code Case N-504-2(g), Items 2 and 3, will be performed as they relate to your outage schedule. It is the staff's expectation that this requirement will be satisfied prior to placing the welds/plant into service. This expectation is reflected in recent safety evaluations since your Relief Request ISI-2-18, dated February 22, 2006. If you cannot complete these analyses prior to startup, relief from this requirement must be requested with sufficient justification for the staff to grant relief.
5. Please indicate the maximum surface area of the part of the overlay that is deposited on the ferritic portions of the weld to confirm whether the 100 square inches limitation of Code Case N-638-1 is met.

6. On page 1 to Table 3 of your submittal, you state: "In lieu of the required ultrasonic examination of 4.0(b) only the required liquid penetrant will be performed. The ultrasonic examination will be in accordance with N-504-2 and Appendix Q." You state that ". . . it is believed that for this type of repair that any major base material cracking would take place in the HAZ [heat-affected zone] directly below the weld overlay or in the underlying Inconel 82/182 weld deposit and not in the required band of material out beyond the overlay. Therefore, it is assumed that if this cracking were to occur it would be identified by the ultrasonic examination of the weld overlay and not performing the required base material ultrasonic examination should be considered acceptable." Your statements "it is believed" and "it is assumed" do not meet the staff's threshold for an acceptable technical justification in accordance with paragraph 50.55a(a)(3)(i) of Title 10 of the *Code of Federal Regulations*.

Typically, in lieu of providing an acceptable justification, licensees have requested relief from the ultrasonic area requirements and performed a "best effort" examination of the 1.5T area. Please provide an acceptable technical justification or revise your relief accordingly.

San Onofre Nuclear Generating Station  
Units 2 and 3

cc:

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