Southern California Edison Company

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November 22, 1994

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Inservice Testing Program
Pump Relief Requests Nos. 13 and 14
San Onofre Nuclear Generating Station
Units 2 and 3

This letter transmits the enclosed Pump Relief Request (PRR) Nos. 13 and 14 to the San Onofre Units 2 and 3 Inservice Testing Program. San Onofre Units 2 and 3 are in the second ten-year interval, and the current program is based on the 1989 Edition of the ASME Code with no Addenda (OM-6 for pumps).

PRR 13 requests relief to use installed instrumentation for inservice testing in lieu of special test gauges. The existing installed station instruments do not meet the Code range requirements, but their overall accuracy exceeds the Code requirements. The combination of range and accuracy of the installed instrumentation provides for the acquisition of repeatable data that meets the intent of the Code. Installing instrumentation to meet the specific requirements results in unnecessary labor and radiation exposure with little or no benefit in monitoring capabilities.

PRR 14 requests relief from the lower level Alert Range and the Required Action Range for vertical line shaft pump differential pressure, as applicable to our Salt Water Cooling (SWC) Pumps. The SWC pumps operate at a significant margin above the flow and pressure differential assumed in the safety analysis.

These relief requests eliminate a burden on plant operations for which there is little added safety value. Please let me know if you have any questions.

Very truly yours,

Walter C. Marsh

Enclosures

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PDR ADOCK 05000361
Q PDR

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cc: L. J. Callan, Regional Administrator, NRC Region IV
A. B. Beach, Director, Division of Reactor Projects, NRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

bcc: (See attached sheet)