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Subject: acceptance review of August 7, 2011, submittal regarding multiple relief requests (Tac Nos ME9201 through ME9210)
Date: Monday, September 17, 2012 8:07:41 AM

Linda Conklin
Manager, Nuclear Licensing
San Onofre Nuclear Generating Station
Southern California Edison

By letter dated August 6, 2012, Southern California Edison(the licensee) submitted multiple requests for relief from the requirements of the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code, for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. In its letter the licensee designated these relief requests IST-4-P-1, IST-4-P-2, IST-4-P-3, IST-4-V-1, and IST-4-V-2. If authorized the relief requests would do the following:

- IST-4-P-1 would allow the use of installed pressure instrumentation for saltwater cooling pump testing. Temporary pressure gauges that meet the range and accuracy requirements of the Code would be used for comprehensive pump testing.
- IST-4-P-2 would allow the use of installed instrumentation for pump testing in the following systems: emergency chilled water, component cooling water seismic make-up, diesel generator fuel oil transfer, containment spray system, and low pressure safety injection. Although the existing installed instruments do not meet the Code range requirements, the licensee contends that the combination of range and accuracy of the installed instrumentation yields a reading that is better than the reading achieved from instruments that meet the minimum Code requirement.
- IST-4-P-3 would allow the use of minimum flow line for flow testing of the auxiliary feedwater pumps.
- IST-4-V-1 would allow an alternative for check valve test requirements for the internal spring-loaded poppet valves in the upstream (high pressure) segment of the shutdown cooling system. As opposed to disassembling the valves to verify the valves close functional capability, the alternative would allow the use of a combination of diagnostic testing of the motor operated gate valves coupled with observation of the normal operation of these valves during the course of the plant shutdown evolutions to provide adequate indication of the poppet valve's performance.
- IST-4-V-2 would allow certain motor-operated valves that are included in the motor-operated valve program to be tested in accordance with the ASME Code for Operation and Maintenance of Nuclear Power Plants Code Case OMN-1, "Alternative Rules for Preservice and Inservice Testing of Active Electric Motor-Operated Valve Assemblies in Light-Water Reactor Power Plants."

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory

Commission (NRC) staff's acceptance review of these relief requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

If you have any questions, please contact me.

Sincerely,

Joe Sebrosky
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