

March 7, 2005

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

**Subject: Docket Nos. 50-361 and 50-362
NRC Generic Letter 2004-02
Response To NRC Request For Information
San Onofre Nuclear Generating Station Units 2 and 3**

- References: 1) NRC Generic Letter 2004-02 issued September 13, 2004; Subject: Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors
- 2) Letter from Suzanne C. Black (NRC), to Anthony R. Pietrangelo (NEI) dated December 6, 2004; Subject: Pressurized Water Reactor Containment Sump Evaluation Methodology; transmitting: Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Generic Letter 2004-02, Nuclear Energy Institute Guidance Report (Proposed Document Number NEI 04-07), "Pressurized Water Reactor Sump Performance Evaluation Methodology"

Dear Sir or Madam:

By Reference 1, the NRC requested that Southern California Edison (SCE) perform an evaluation of the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions in light of information provided in the letter and, if appropriate, take additional actions to ensure system function. Reference 1 also requests that addressees provide the information specified in the letter to the NRC; the first information submittal is requested to be provided within 90 days of the date of the safety evaluation report, and the second is requested to be provided no later than September 1, 2005.

By Reference 2, the NRC has provided the Safety Evaluation Report, which provides an NRC-approved methodology for performing the evaluation requested in Reference 1.

Specifically, Generic Letter 2004-02 (Reference 1) requests that the following information be provided in this first information submittal:

1. Within 90 days of the date of the safety evaluation report providing the guidance for performing the requested evaluation, addressees are requested to provide information regarding their planned actions and schedule to complete the requested evaluation. The information should include the following:

- (a) A description of the methodology that is used or will be used to analyze the susceptibility of the ECCS and CSS recirculation functions for your reactor to the adverse effects identified in this generic letter of post-accident debris blockage and operation with debris-laden fluids identified in this generic letter. Provide the completion date of the analysis that will be performed.
- (b) A statement of whether you plan to perform a containment walkdown surveillance in support of the analysis of the susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in this generic letter. Provide justification if no containment walkdown surveillance will be performed. If a containment walkdown surveillance will be performed, state the planned methodology to be used and the planned completion date.

SCE response to item 1a:

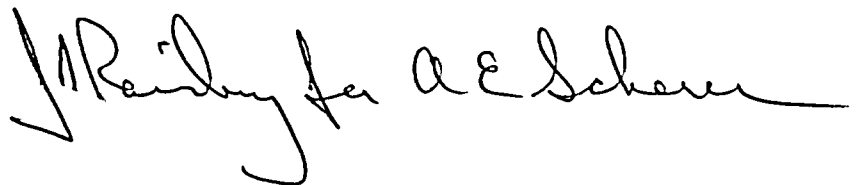
SCE will perform a mechanistic evaluation utilizing the guidance provided in the NRC approved methodology stated in Reference 2. The methodology may be adjusted with plant-specific licensing basis information and contractor-specific proprietary information as appropriate with the current state of knowledge. The evaluation will be completed, and requested information submitted to the NRC no later than September 1, 2005, in accordance with Generic Letter 2004-02 (Reference 1).

SCE response to item 1b:

SCE performed containment walkdown surveillance of both units; Unit 3 during the Cycle 12 refueling outage in January 2003, and Unit 2 during the Cycle 13 refueling outage in February 2004. These walkdowns were performed utilizing the methodology guidelines provided in NEI 02-01, Condition Assessment Guidelines: Debris Sources Inside PWR Containments; Revision 1, September 2002.

If you have any questions or require any additional information, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,



cc: B. S. Mallett, Regional Administrator, NRC Region IV
B. M. Pham, NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3