

10 CFR 2.202

October 29, 2012

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**Subject:** **Docket Nos. 50-361 and 50-362**  
**License Nos. NPF-10 and NPF-15**  
**Southern California Edison's Initial Status Report in Response to**  
**March 12, 2012 Commission Order Modifying Licenses with Regard**  
**to Requirements for Reliable Spent Fuel Pool Instrumentation**  
**(Order Number EA-12-051)**  
**San Onofre Nuclear Generating Station, Units 2 and 3**

References:

1. Letter dated March 12, 2012 from E. J. Leeds and M. R. Johnson, USNRC, to Peter T. Dietrich, "Issuance of Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation"
2. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation", Revision 0, issued August 30, 2012 (ADAMS Accession Number ML12221A339)

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission issued an order (Reference 1) to Southern California Edison (SCE). Reference 1 was immediately effective and directs SCE to have a reliable indication of the water level in associated spent fuel storage pools. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance

of Reference 2. This report confirms SCE has received Reference 2 and is in the process of evaluating the guidance for the purpose of providing a reliable indication of the water level in associated spent fuel storage pools as described in Attachment 2 of Reference 1.

Major activities during this reporting period:

- Resources are being identified and project plans have been initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan as required by Condition IV.C.1.a of Reference 1.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal of the overall integrated plan:

- None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for SONGS Unit 2 prior to December 31, 2016. (The second Unit 2 refueling outage after submittal of the overall integrated plan is currently expected to occur in summer 2017.)
- Implementation of the order will be completed for SONGS Unit 3 prior to December 31, 2016. (The second Unit 3 refueling outage after submittal of the overall integrated plan is currently projected to occur in fall 2017.)

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Steven D. Root, Manager of Special Projects, at 949-368-6480.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/29/2012

By:



Douglas R. Bauder

Site Vice President and Station Manager

cc: Director, Office of Nuclear Reactor Regulation  
E. E. Collins, Regional Administrator, NRC Region IV  
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3  
R. Hall, NRC Project Manager, San Onofre Units 2 and 3  
Ms. Lisa M. Regner, NRR/JLD/PMB, NRC  
Mr. Blake A. Purnell, NRR/JLD/PMB, NRC  
Mr. Steven R. Jones, NRR/DSS/SBPP, NRC