



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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June 30, 2000

Harold B. Ray, Executive Vice President  
Southern California Edison Co.  
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P.O. Box 128  
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**SUBJECT: REQUEST TO RESCHEDULE OPERATIONAL SAFEGUARDS RESPONSE  
EVALUATION AT SAN ONOFRE NUCLEAR GENERATING STATION**

Dear Mr. Ray:

This letter responds to your letter dated June 12, 2000, which requested that we reschedule the Operational Safeguards Response Evaluation (OSRE) at the San Onofre Nuclear Generating Station (SONGS). Currently, the OSRE is scheduled for the week of November 27, 2000, along with Attachment 3 to Baseline Inspection Procedure 71130, "Response to Contingency Events." Since Attachment 3 covers many of the same elements as the OSRE, we plan to evaluate the elements not covered in the OSRE (e.g., protected area detection and assessment aids).

As you know, the OSRE is the NRC's current method for conducting force-on-force exercises. The force-on-force element of Inspection Procedure 71130, Attachment 3, was temporarily suspended until an exercise rule or industry initiatives (i.e., Safeguards Performance Assessment or SPA) were implemented. The decision was made to continue the OSRE program until the SPA was implemented, and Region IV was directed by the Office of Nuclear Reactor Regulation (NRR) to recommend two plants for OSREs. According to the guidance provided by NRR, the selection of these two plants was made on the basis of the following considerations:

- Length of time since the last OSRE
- Past performance
- Changes to the security program

For the following reasons, Region IV selected SONGS as one of the two plants for an OSRE:

- SONGS was the first Region IV plant, and one of the first plants nationwide, to receive an OSRE (March 1992). Since that time, the NRC has not reviewed your ability to protect the plant against the design basis threat.
- The NRC has identified multiple performance problems in the physical security area over the past 3 to 4 years.

- There have been some security plan changes and changes in defensive strategy and numbers of response personnel since the OSRE in 1992. Moreover, there has been a significant turnover in security management personnel in the last 2 years.

When the proposed OSRE date of October 2000 was communicated, your staff expressed concerns about the date because the plant would be in an outage at the time. After coordination with NRR, the OSRE was rescheduled for November 27 through December 1, 2000.

Your letter of June 12, 2000, requested an additional postponement of the OSRE inspection on the basis of three major program changes:

- (1) Replacement of a large portion of the Unit 2 and 3 protected area detection system and several portions of the protected area barrier.

NRC Response

Your letter stated that this change is planned for completion in October 2000, prior to the conduct of the OSRE/Attachment 3 inspection; therefore, this change should not be affected by the planned inspection of November 27 - December 1, 2000.

- (2) Installation of a closed-circuit television system (CCTV) to replace the current system.

NRC Response

Your current practice of utilizing a combination of manned guard towers and limited applications of CCTV has been approved since the plant was licensed and determined to meet the intent of the rule and your physical security plan during numerous inspections. Therefore, simply replacing the manned guard towers with a CCTV system would not invalidate any findings of adequacy during the November 2000 evaluation.

- (3) Construction of a new protected area barrier between Unit 1 and Units 2/3 in support of the decommissioning of Unit 1.

NRC Response

If the new barrier is under construction during the planned inspection, the original barrier will still be in place to provide delay. Therefore, this change would not invalidate any findings of adequacy during the November 2000 evaluation.

In addition, your letter states your intent to make major revisions to security procedures, physical security and contingency plans, and tactical response strategy, and to review and update the target set analysis. The baseline inspection program includes a recurring inspection requirement to evaluate each licensee's ability to defend the plant against the design-basis threat. As with any inspection procedure, the inspection reviews your current capabilities. The OSRE and the draft SPA program are temporary evaluation techniques in place until an exercise rule is formally adopted under changes to 10 CFR 73.55. Regardless of what process is used, an inspection of your response capabilities, including force-on-force exercises will be

required within a 3-year cycle. Any changes to your program will be reviewed during the recurring baseline inspection program.

After careful review of your request, based on the above NRC responses, we have determined that there is not sufficient justification to reschedule the OSRE/Attachment 3 inspection scheduled for the week of November 27, 2000.

Should you have any questions regarding this matter, please contact Mr. Arthur Howell III at (817) 860-8180.

Sincerely,

**/RA/**

Ellis W. Merschoff  
Regional Administrator

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