

March 18, 2002

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

Secretary of the Commission
U. S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudication's Staff
Washington, D.C. 20555

Director, Office of Nuclear Regulatory Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362
RESPONSE TO ORDER MODIFYING LICENSES
ANSWER TO ORDER MODIFYING LICENSES
REQUEST FOR EXTENSION TO FILE ANSWER AND REQUEST HEARING
San Onofre Nuclear Generating Station, Units 2 and 3**

Enclosures: (1) Response to Conditions B.1 and B.2 – unnecessary or unsafe requirements
(2) Response to Condition C.1 – compliance discussion and schedule

Southern California Edison (SCE) has received the Order Modifying Licenses ("Order") transmitted by letter from Samuel J. Collins to Harold B. Ray dated February 25, 2002 applicable to the San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2&3). This letter provides the SCE response required by Section III, and the answer and request for extension required by Section IV of the Order.

Enclosure (1) identifies requirements contained in the Order which SCE considers unnecessary or unsafe because of specific circumstances at SONGS 2&3 and provides supporting justification.

Enclosure (2) discusses each requirement set forth in Attachment 2 of the Order and provides a schedule for SONGS 2&3 to achieve compliance.

**SCE*

SAFEGUARDS INFORMATION

NOTICE: DECONTROLLED upon separation from enclosures (1) and (2).

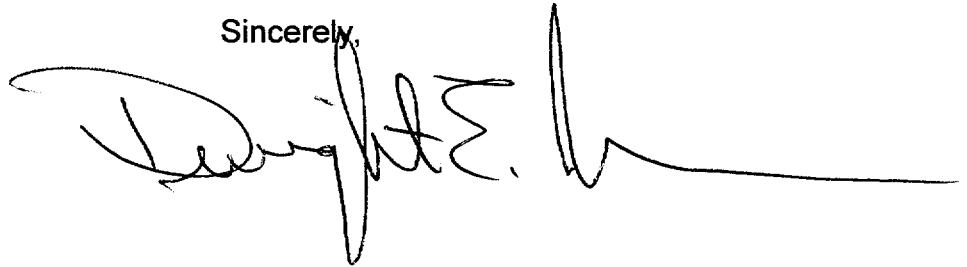
P. O. Box 128
San Clemente, CA 92674-0128
949-368-1480
Fax 949-368-1490

*1 advanced copy to
B. Mart*

SCE has provided a full response to the requirement stated at B.2(a) of the Order Attachment 2. In the event the methods of analysis and results are unacceptable to the NRC, pursuant to Section IV of the Order, SCE reserves the right to a hearing to contest any unfavorable action by the NRC regarding this requirement. Alternatively SCE requests an extension of time until August 31, 2002 to perform additional analysis as necessary to remedy deficiencies identified by the NRC.

Note that the enclosures to this letter contain Safeguards Information as defined by 10 CFR 73.2. This transmittal letter may be decontrolled upon separation from its enclosures.

Sincerely,

A handwritten signature in black ink, appearing to read "Dwight E. L.", with a long horizontal line extending to the right.

Enclosures

cc: E. W. Mershoff, Regional Administrator, NRC Region IV
G. M. Tracy, NRC Chief, Operator Licensing Human Performance & Plant Support Branch
L. Raghavan, , NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3

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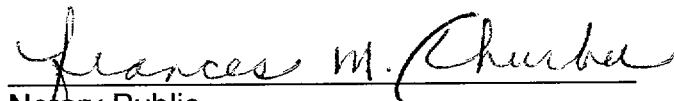
State of California
County of San Diego

Subscribed and sworn to (or affirmed) before me this 18 day of

March, 2002, by


Dwight E. Nunn
Vice President




Notary Public

SAFEGUARDS INFORMATION

NOTICE: DECONTROLLED upon separation from enclosures (1) and (2).

CERTIFICATE OF SERVICE


I hereby certify that copies of ANSWER TO ORDER MODIFYING LICENSES were served on this 18th day of March, 2002, upon the persons listed below, via overnight delivery.

Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudication's Staff
Washington, DC 20555

Director, Office of Nuclear Regulatory Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Assistant General Counsel for Materials
Litigation and Enforcement
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
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