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EDISON

An EDISON INTERNATIONALSM Company

Dwight E. Nunn
Vice President

March 7, 2003

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

Subject: **Docket Nos. 50-361 and 50-362**
Development of Revised Design Basis Threat
San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

Southern California Edison (SCE) attended the meeting on January 9, 2003 (as well as several subsequent meetings) at which the NRC staff presented information on the development of a revised design basis threat (DBT) and associated adversary attributes. SCE has actively participated with others in the industry in conjunction with the Nuclear Energy Institute (NEI) to review the staff's proposal as requested in the Roy P. Zimmerman (NRC) letter to Ralph A. Beedle (NEI) dated January 2, 2003.

The results of the industry review are presented in the Stephen D. Floyd (NEI) letter to Roy P. Zimmerman (NRC) dated March 5, 2003. SCE has participated in preparing, endorses and concurs in the industry's views set forth in this NEI letter. We would add, however, that SCE's analysis of the cost and schedule to accommodate the draft DBT is substantially greater than the NEI figures. In all other respects we concur with the NEI letter.

Sincerely,

cc: The Commissioners
Executive Director for Operations
Director, Office of Nuclear Security and Incident Response
Regional Administrator, NRC Region IV
NRC Senior Resident Inspector, San Onofre Units 2 and 3