



SOUTHERN CALIFORNIA
EDISON

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Dwight E. Nunn
Vice President

April 1, 2003

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

Subject: **Docket Nos. 50-361 and 50-362**
Compensatory Security Measures
San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

The NRC issued the Order Modifying Licenses ("Order") by letter dated February 25, 2002 that requires implementation of interim compensatory measures (ICM) for plant security purposes. In recent meetings with the NRC staff, there has surfaced what appears to be conflict between NRC Staff's current interpretations of the Order and longstanding NRC regulatory requirements, guidance and practices governing implementation of compensatory measures for unplanned temporary impairments of security systems and programs. The purpose of this letter is to offer the Southern California Edison (SCE) position on this subject, which is based upon NRC's longstanding licensing and regulatory requirements, guidance and practices.

The enclosure to this letter provides a discussion of this subject and also summarizes actions taken regarding compliance with the Commission's Order. SCE requests a meeting with the NRC staff to discuss this matter further if that would be helpful in reaching a mutual understanding of these issues.

Note that the enclosure to this letter contains Safeguards Information as defined by 10 CFR §73.2. This transmittal may be decontrolled upon separation from the enclosure.

Sincerely,

Enclosure

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
G. M. Tracy, Office of Nuclear Security and Incident Response
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

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