



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 21, 2003

Mr. Dwight E. Nunn
Vice President - San Onofre Nuclear
Generating Station, Units 2 and 3
Southern California Edison
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: ADDITIONAL INFORMATION ON ALTERNATIVE MEASURES IMPLEMENTED
TO SATISFY A CONDITION OF AN NRC ORDER MODIFYING THE LICENSE

Dear Mr. Nunn:

This letter is in response to your January 16, 2003, letter, in which Southern California Edison (SCE) provided additional information on alternative measures being implemented at San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, to satisfy Interim Compensatory Measure (ICM) B.2.a.(2) of the February 25, 2002, Order. Following a meeting between U.S. Nuclear Regulatory Commission (NRC) personnel and representatives from SCE on December 10, 2002, and an onsite NRC inspection on December 16-17, 2002, at SONGS, the NRC requested additional information on your alternative measures to better understand your approach and to determine its acceptability in meeting the requirements of ICM B.2.a.(2). Your proposed measures have been the topic of several discussions with the staff during its ongoing review of this matter.

ICM B.2.a.(2) contains a succinct requirement which the alternative measures implemented at SONGS failed to meet. However, the NRC has reviewed the information that you provided. Based on results of the onsite inspection and review of the provided information, the NRC determined that the measures being implemented at SONGS would not be an acceptable alternative for satisfying the requirements of ICM B.2.a.(2). Since this and other issues associated with your alternative measures is Safeguards Information (SGI), the specific details are discussed in an enclosure to this letter.

WARNING: Violation of 10 CFR 73.21
"Requirements for the Protection of
Safeguards Information is subject to
"CIVIL and CRIMINAL" Penalties

NOTICE: The Document(s) transmitted herewith
contains "Safeguards Information." When
separated from Enclosure(s) this Cover Document
is "DECONTROLLED."

SAFEGUARDS INFORMATION

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D. E. Nunn

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Until such time that full compliance with ICM B.2.a.(2) of the Order is achieved, SONGS shall maintain other temporary alternative compensatory measures that have been evaluated by the NRC and implemented upon the identification of this issue. Further, in accordance with conditions C.1. and C.2. of the Order, the licensee shall submit to the Commission within 30 days of the date of this letter a plan of action and an expeditious schedule for achieving compliance with the Order. The licensee shall also notify the Commission when full compliance is achieved. The NRC Region-IV Office will facilitate final resolution of this matter.

In its deliberations for this response, the licensee should consider the April 29, 2003, Order issued by the Commission to revise the design basis threat. This Order does not obviate the need for licensees to continue to meet the objectives of the appropriate security level described in NRC Regulatory Issue Summary 2002-12A, "Power Reactors NRC Threat Advisory and Protective Measures System," and maintain the effectiveness of existing security measures taken in response to the events of September 11, 2001, and the Orders issued on February 25, 2002, and January 7, 2003. The NRC will consider requests to relax or rescind, either in whole or in part, the requirements of the February 25, 2002, Order, imposing the Interim Compensatory Measures.

The enclosed SGI material must be protected in accordance with 10 CFR 73.21, Requirements for the Protection of Safeguards Information, and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954. Therefore, the material will not be placed in the Public Document Room. However, this transmittal letter need not be controlled when separated from the enclosure.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter without enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adms.html> (the Public Electronic Reading Room).

If you have additional questions concerning this issue, please contact Ron Albert of my staff on (301) 415-6692.

Sincerely,

/RA/ (J. J. Holonich for)

Glenn M. Tracy, Director
Division of Nuclear Security
Office of Nuclear Security
and Incident Response

Docket Nos. 50-361 and 50-362
License Nos. NPF-10 and NPR-15

Enclosure: Evaluation of SCE's Implementation
of Alternative ICM (**CONTAINS SGI**)

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If you have additional questions concerning this issue, please contact Ron Albert of my staff on (301) 415-6692.

Sincerely,
(Original Signed by J. J. Holonich for:)
Glenn M. Tracy, Director
Division of Nuclear Security
Office of Nuclear Security
and Incident Response

Docket Nos. 50-361 and 50-362
License Nos. NPF-10 and NPR-15
Enclosure: Evaluation of SCE's Implementation
of Alternative ICM (**CONTAINS SGI**)

cc: see next page

DISTRIBUTION (with SGI): SONGS file R. Albert T. Pruett V. Ordaz J. Peralta

DISTRIBUTION (without SGI):

DNS r/f J. Goldberg S. Collins R. Zimmerman A. Howell M. Weber W. Kane
A document name: A:\SONGS(5).wpd *see previous concurrence **ML031410752**

OFC:	DNS/SOS	DNS/SOS	RIV	OGC	OE	D:DLPM	D:DNS
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cc w/o enclosure w/o SGI:

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