

June 20, 2003

Director,  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555 - 0001

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555 - 0001

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

**Reference: Glenn M. Tracy (NRC) Letter to Dwight E. Nunn (SCE), Subject:  
"Additional Information on Alternative Measures Implemented to  
Satisfy a Condition of an NRC Order Modifying the License"  
(May 21, 2003)**

Gentlemen:

The purpose of this letter is to provide Southern California Edison's (SCE's) response to the Nuclear Regulatory Commission (NRC) May 21, 2003 letter (Reference). As discussed, and concluded, at the meeting with Mr. Glenn Tracy, et. al., on June 12, 2003, SCE is currently in compliance with the Interim Compensatory Measure (ICM) B.2.a.(2) as interpreted by the NRC Staff in the May 21, 2003 letter.

The details of SCE's "temporary alternative compensatory measures" are set forth in Enclosure (1). SCE will maintain these measures in place until the final modifications, as stated in SCE's June 3, 2003 Answer to the revised Design Basis Threat (DBT) Security Order, are complete and the NRC is notified. Further, as discussed at the June 12, 2003 meeting, the changes committed to in respect to the revised DBT Security Order and outlined in Enclosure (2), resolves the concerns expressed in the May 21, 2003 letter.

SCE remains convinced that it has acted properly to address unplanned or planned, temporary security impairments. Nevertheless, as detailed above, SCE will proceed directly to modify the plant and defensive strategy to achieve compliance with the revised DBT Security Order. For the reasons stated in discussions between NEI and the Commission and reflected in the Answer of SCE and other licensees to the April Security Orders, SCE

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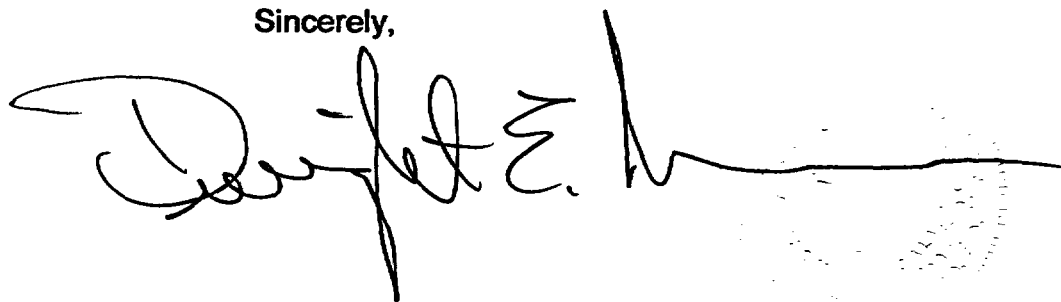
requests that the NRC exercise enforcement discretion with respect to compliance with the February and April Orders. SCE's actions to achieve compliance and its maintenance of "temporary alternative compensatory measures" assures protection of public health and safety and the common defense and security.

In addition, in accordance with the May 21, 2003 letter, which provides for NRC consideration of "requests to relax or rescind, either in whole or in part, the requirements of the February 25, 2002 Order," SCE requests that the NRC grant relief from the February Order to incorporate SCE's commitment to Enclosure (1) and the maintenance of these "temporary alternative compensatory measures" pending completion of the modifications required by the revised DBT Security Order.

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.

In summary, based on the June 12, 2003 meeting with the NRC Staff, SCE understands that the measures already in place at SONGS are a satisfactory means of complying with ICM B.2.a.(2). If we can be of any additional assistance in this regard, please advise.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas E. H.", with a long horizontal line extending to the right. The signature is written in a cursive style.

Enclosures

cc: T. P. Gwynn, Acting Regional Administrator, Region IV  
G. M. Tracy, Director, Division of Nuclear Security  
B. M. Pham, NRR Project Manager, San Onofre Units 2 and 3  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3

**SAFEGUARDS INFORMATION**  
**NOTICE: DECONTROLLED upon separation from the enclosure**

State of California  
County of San Diego

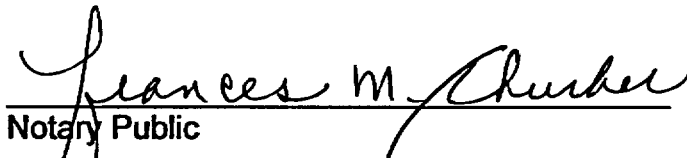


Subscribed and sworn to (or affirmed) before me this 20 day of

June, 2003, by



Dwight E. Nunn  
Vice President, Engineering & Technical Services



Frances M. Thurber  
Notary Public