

March 17, 2004

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

**Subject: Docket Nos. 50-361 and 50-362
Letter of Intent to Participate in Probabilistic Risk
Assessment Quality Pilot Application Program
San Onofre Nuclear Generating Station Units 2 and 3**

- References:
1. Memorandum dated December 3, 2003, Peter C. Wen, NRR to Cathy Haney, NRR, Summary of November 20, 2003, "Meeting with Nuclear Energy Institute (NEI) Regarding Probabilistic Risk Assessment Quality Pilot Applications"
 2. Memorandum dated November 19, 2003, J. L. Funches, CFO, NRR to James E. Dyer, Director, NRR, "Fee Waiver for Pilot Application of Approach Proposed in DG-1122, "Determining the Technical Adequacy of PRA Results for Risk-Informed Activities," and The Associated Draft Standard Review Plan (SRP) Section"

Dear Sir or Madam:

As requested at the Reference 1 meeting on November 20, 2003, Southern California Edison (SCE) submits this letter of intent to participate in the NRC probabilistic risk assessment pilot program to guide implementation of Regulatory Guide 1.200 For Trial Use, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and the associated draft standard review plan, Chapter 19.1, "Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."

The pilot application SCE proposes to submit is a license amendment request (LAR) which will include adding a new Condition to Limiting Condition For Operation 3.8.4, "DC Sources – Operating," allowing manual cross-connect of distribution subsystems with a Completion Time of 30 days. The LAR will include other associated changes necessary to allow on-line maintenance of the Batteries and DC Sources.

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The NRC has indicated this review of pilot applications is eligible for a waiver of review fees (Reference 2).

Our current schedule for submitting the LAR is April 2004. Our current plant maintenance schedule would necessitate that we target NRC completion of the LAR within one year; i.e., by April 2005.

If you have any questions or require additional information, please contact Mr. Jack Rainsberry at 949-368-7420.

Sincerely,



cc: B. S. Mallett, Regional Administrator, NRC Region IV
B. M. Pham, NRC Project Manager, San Onofre Units 2, and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 & 3
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