



SOUTHERN CALIFORNIA
EDISON[®]

An EDISON INTERNATIONAL[®] Company

Dwight E. Nunn
Vice President

April 28, 2004

U.S. Nuclear Regulatory Commission
ATTN: Director, Office of Nuclear Reactor Regulation
Washington, DC 20555-0001

**SUBJECT: Docket Nos. 50-361 and 50-362
Supplemental Response to the April 29, 2003, Orders to the San
Onofre Nuclear Generating Station Units 2 and 3**

Dear Sir:

The U. S. Nuclear Regulatory Commission (NRC) issued an Order dated April 29, 2003 ("Order EA-03-086") requiring compliance with the revised Design Basis Threat (DBT) and other security related Orders (collectively "NRC Orders") for the San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2&3). This Supplemental Response of Southern California Edison (SCE) to Order EA-03-086 supplements the previous response dated June 3, 2003 that SCE filed pursuant to 10 CFR § 50.4 and Section III, Conditions A.1, B.1 and B.2.

Order EA-03-086 imposes license conditions on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Order requires licensees to revise their Physical Security Plans and Safeguards Contingency Plans to provide protection against the revised DBT set forth in Attachment 2 to the Order. Section III.A also requires licensees to revise the security force Training and Qualification Plan to implement the revised DBT. These revised plans, along with an implementation schedule, were required to be submitted to the Commission for review and approval no later than April 29, 2004.

In accordance with the Order and 10 CFR § 50.4, SCE is submitting this Supplemental Response for the above-mentioned licensed facility. This submittal includes, as Attachment A, revisions to the SONGS 2&3 Physical Security Plan, the Safeguards Contingency Plan, and the Training and Qualification Plan as required by Order EA-03-086. These plans contain the integrated commitments to comply with the NRC Orders issued on February 25, 2002, January 7, 2003, and April 29, 2003. As a result, these revised Security Plans supersede previous submittals of SCE in these areas, including those related to the February 25, 2002, January 7, 2003, and April 29, 2003 NRC Orders. SCE will continue to implement the provisions of those previous submittals

SAFEGUARDS INFORMATION

P.O. Box 128
San Clemente, CA 92674-0128
949-368-1480
Fax 949-368-1490

NOTICE: DECONTROLLED upon separation from the attachments.

NS03

except to the extent that they are superseded by these plans. All changes that have been or will be made have been evaluated to ensure that they do not compromise plant safety.

SCE has developed these plans to be consistent with NEI-03-01 (Revision 1) *Nuclear Power Plant Access Authorization Program* (April 2004), NEI-03-09 (Revision 2 (draft)) *Security Officer Training Program* (April 2004) and NEI-03-12 (Revision 2 (draft)) *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program* (April 2004). The schedule for completing those actions, which include the identification of major transitional activities, is provided in Attachment B to this submittal. To facilitate the NRC's review, any provisions that are different from NEI-03-12 are identified and the justification provided in Attachment C, *Deviations from NEI-03-12*, to this submittal. Attachment D, *Previous Exemptions to 10 CFR Part 73*, is a listing of any exemptions to 10 CFR Part 73 previously granted to SCE and an explanation of their status under the plans hereby submitted. Attachment E, *Justification for Alternatives*, includes the justification for any of the alternatives provided in NEI-03-12 or in "NRC Guidance on Implementation of the April 2003 Revised Design Basis Threat" that SCE has adopted. Further, SCE has chosen to implement Option 1 of Section 9.4.1.2 of NEI-03-12 and the justification for that choice is provided in Attachment F, *Justification for Vehicle Search Criteria*, to this submittal.

Implementation of the SONGS revised protective strategy relies in part on draft *NRC Guidance on Implementation of the April 2003 Revised Design Basis Threat*, revision 6, dated January 16, 2004. In addition to this NRC guidance, SCE has identified key additional guidance that it relies on for effective implementation of the revised Security Plans. The key additional guidance is provided as Attachment G.

When the final revision of NEI-03-12 is approved by the NRC, SCE will supplement this response, if necessary, to conform with NEI-03-12 as finally approved. However, with the filing of these plans, SCE will be implementing its revised protective strategy and completing plant modifications and security personnel training pursuant to these plans to ensure that implementation will be completed by October 29, 2004, as required by the NRC Orders. Upon completion of the implementation of these plans, SCE will be in compliance with all applicable security requirements. For the purpose of complying with the requirements of 10 CFR Part 73 to conduct an annual audit, the date of the letter that will be submitted to the NRC pursuant to Order EA-03-086 certifying that implementation of the plans is complete will be the effective date for determining commencement of the annual audit requirement period.

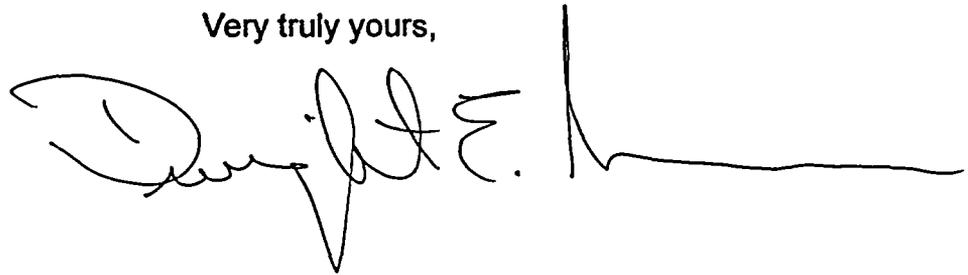
SAFEGUARDS INFORMATION

NOTICE: DECONTROLLED upon separation from the attachments.

Because of the requirement for these plans to be fully implemented by October 29, 2004, the need to integrate the requirement of the revised DBT Order with the Orders issued February 25, 2002, January 7, 2003, and April 29, 2003, and the Commission's determination that it would be appropriate to exercise enforcement discretion to accommodate any transitional issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of the NRC Orders, SCE requests that enforcement discretion be exercised during the transition period until full implementation of the plans is accomplished and the physical plant modifications and security force training are complete. At that time, the revised plans will be fully implemented and the exercise of enforcement discretion will no longer be necessary.

Note that the attachments to this letter contain safeguards information as defined by 10 CFR § 73.2. This transmittal letter may be decontrolled upon separation from the attachments.

Very truly yours,

A handwritten signature in black ink, appearing to read "Douglas E. Mallett", followed by a long horizontal line extending to the right.

Attachment A: SONGS 2&3 Security Plans
Attachment B: SONGS 2&3 Schedule
Attachment C: Deviations From NEI-03-12
Attachment D: Previous Exemptions to 10 CFR Part 73
Attachment E: Justification for Alternatives
Attachment F: Justification for Vehicle Search Criteria
Attachment G: SONGS 2&3 Implementation Guidance

cc: Document Control Desk
B. S. Mallett, Regional Administrator, NRC Region IV
G. M. Tracy, Director, Division of Nuclear Security
B. M. Pham, NRC Project Manager, San Onofre Units 2 & 3
C. C. Osterholtz, NRC Senior Resident Inspector

SAFEGUARDS INFORMATION

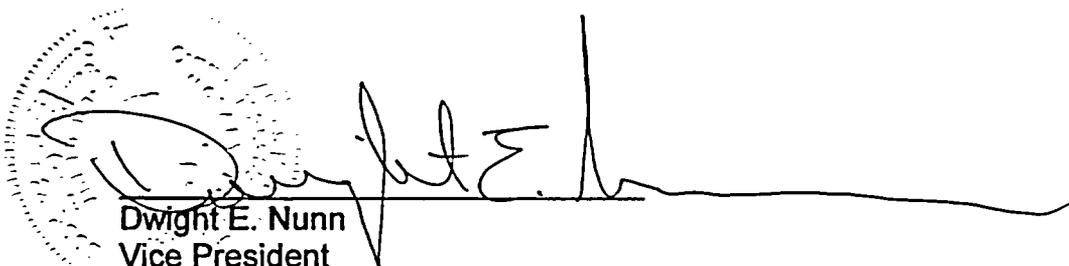
NOTICE: DECONTROLLED upon separation from the attachments.

State of California
County of San Diego

In accordance with 10 CFR § 2.202(b), the following affirmation is provided:

Dwight E. Nunn states that he is Vice President of Southern California Edison, is authorized to execute this oath on behalf of Southern California Edison and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,



Dwight E. Nunn
Vice President
Southern California Edison

Sworn to and subscribed before me this 28 day of
April, 2004



Frances M. Thurber
Notary Public

My Commission expires: 3/23/2005

SAFEGUARDS INFORMATION
NOTICE: DECONTROLLED upon separation from the attachments