

May 27, 2005

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

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

Gentlemen:

The NRC issued Order EA-02-026 For Interim Safeguards and Security Compensatory Measures dated February 25, 2002 (the "ICM Order") for the San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2&3).

The ICM Order imposed requirements 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 ICM Order required licensees to implement certain changes in physical security plans and safeguards contingency plans on an interim basis until final requirements were established. Among other requirements, Southern California Edison (SCE) was required to implement Section B.5.b of Attachment 2 of the ICM Order by August 31, 2002.

Subsequently, the NRC issued Orders, dated April 29, 2003, requiring compliance with a revised Design Basis Threat (DBT) for Operating Power Reactors (the "DBT Order") and other security related Orders for SONGS 2&3. In many ways, the DBT Order complemented or superseded the interim compensatory measures imposed by the ICM Order.

As required by the DBT Order, revised security plans for the above-mentioned licensed facility have been implemented. Subsequently, SCE was requested to respond by May 31, 2005, to the letter from J. E. Dyer, Director, Office of Nuclear Reactor Regulation dated February 25, 2005, *NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b*, and to implement appropriate enhancements to current mitigation strategies by August 31, 2005. Specifically, nuclear power plant licensees were requested by Enclosure 2 to the letter, *Developing Mitigating Strategies / Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order* (dated February 24, 2005) ("NRC B.5.b Guidance"), to review the areas of consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the licensees' mitigating strategies that licensees deemed appropriate in accordance to Attachment B to that Enclosure.

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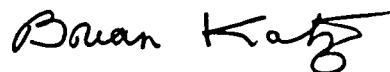
Subsequently, the Nuclear Energy Institute ("NEI"), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use ("NEI Guidance") to assist licensees in responding to the February 25, 2005, letter.

As requested in the February 25, 2005, letter, SCE has reviewed the information in Attachments A and B in accordance with the NEI Guidance and is hereby submitting, as a Safeguards Information enclosure to this letter, SCE's evaluation of the information the NRC provided. The enclosure reflects the results of a comprehensive and thorough review of the guidance and describes the considerations that SCE either has already or intends to implement at SONGS 2&3 by August 31, 2005.

The primary guiding principles used in the conduct of this evaluation were (1) whether or not equipment and resources were "readily available," and (2) if equipment is readily available, can it be effectively utilized in a licensee's mitigating strategy. SCE considered "readily available" to mean that the equipment or resource was already licensee owned, under contract, or part of an existing Memorandum of Understanding. Further, even if equipment and resources are readily available, the second criterion is to ensure that the equipment can be used in a mitigating strategy in an effective manner. Even if the equipment is readily available, it is of no value if it cannot be effective in implementing the mitigating strategy.

In accordance with these principles, mitigative strategies are being implemented to address the NRC B.5.b Guidance. These actions are considered to be commitments for that purpose and will be managed in accordance with SCE's commitment management system.

Respectfully submitted,



Enclosure

cc: B. S. Mallet, Regional Administrator, NRC Region IV
J. E. Dyer, Director, Office of Nuclear Reactor Regulation
G. M. Tracy, Director, Division of Nuclear Security
B. M. Pham, NRC Project Manager, SONGS 2&3
C. C. Osterholtz, NRC Senior Resident Inspector, SONGS 2&3

SAFEGUARDS INFORMATION

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