



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL Company

**DOCKET NUMBER**

**PETITION FILE PRM 54-02**  
**(70 FR 34700)**

Brian Katz  
Vice President

13

August 29, 2005

DOCKETED  
USNRC

August 30, 2005 (10:00am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Secretary  
U.S. Nuclear Regulatory Commission  
Attn: Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

**SUBJECT:** "Andrew J. Spano, County of Westchester, NY:  
Receipt of Petition for Rulemaking"  
70 Federal Register 34700, June 15, 2005  
Docket PRM-54-02

**Reference:** "Request for Comment, PRM-54-02 (70 Fed. Reg. 34700; June 15, 2005)"  
from Anne W. Cottingham, Assistance General Counsel, NEI,  
to Annette L. Vletti-Cook, Secretary, NRC, dated August 29, 2005

Gentlemen:

In the subject Federal Register Notice, the U.S. Nuclear Regulatory Commission (NRC) solicited comments on a petition for rulemaking requesting that the NRC amend the regulations "to provide that a renewed license will be issued only if the plant operator demonstrates that the plant meets all criteria and requirements that would be applicable as if the plant was being proposed de novo for initial construction." Southern California Edison (SCE) believes that the current regulations for license renewal are adequately protective of public health and that the current regulatory process already includes provisions to address significant changes in licensing factors.

License renewal proceedings for a commercial nuclear power reactors should not become a *de novo* review of the facility as if the facility were undergoing initial licensing. The NRC has previously concluded that "(a) its program of oversight is sufficiently broad and rigorous to establish that the added discipline of a formal license renewal review against the full range of current safety requirements would not add significantly to safety, and (b) such a review is not needed to ensure that continued operation during the period of extended operations is not inimical to the public health and safety" [56 FR 64945-46]. The NRC's regulatory process and continual oversight of an operating facility throughout its existing license ensure compliance with license conditions and performance objectives and thereby ensures public health and safety. There is no need for a review of all issues, including emergency planning and site suitability, during licensing renewal.

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Template = SECY-067

SECY-02


U.S. Nuclear Regulatory Commission

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Southern California Edison also supports the comments made by the Nuclear Energy Institute (NEI) in the Reference letter. We urge the U.S. Nuclear Regulatory Commission to deny the petition for rulemaking in its entirety.

Sincerely,

Handwritten signature of Brian Katz in cursive script.