

September 3, 2004

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

Subject: **Docket No. 72-41**  
**ORDER MODIFYING LICENSE**  
**San Onofre Nuclear Generating Station**  
**Independent Spent Fuel Storage Installation**

Reference: D. E. Nunn (SCE) letter to Document Control Desk (NRC),  
*Docket Nos. 50-361 and 50-362, ORDER MODIFYING LICENSES,*  
*San Onofre Nuclear Generating Station, Units 2 and 3*  
(January 7, 2004)

Gentlemen:

Southern California Edison (SCE) is in receipt of *Order for Implementation of Additional Security Measures Associated with Access Authorization for San Onofre Nuclear Generating Station, Units 2 and 3* (EA-03-097) made by the U. S. Nuclear Regulatory Commission (NRC) on August 18, 2004 ("the Order"). The Order modifies the General License for the San Onofre Nuclear Generating Station (SONGS) Independent Spent Fuel Storage Installation (ISFSI) to require compliance with additional security measures (ASMs) given in Attachment 1 to the Order.

Condition IV of the Order requires SCE to submit an answer to the Order in accordance with 10 CFR § 2.202. SCE consents to the Order.

Condition III.C.1 and III.C.2 of the Order requires a response. SCE achieved full compliance with the requirements described in Attachment 1 of the Order on or before January 7, 2004 as explained below.

The General License issued by 10 CFR Part 72, Subpart K, requires SCE to protect the spent fuel against the design basis threat of radiological sabotage in accordance with the same provisions and requirements given in the SONGS 2 & 3 Physical Security Plan (PSP). In the referenced letter, SCE reported that it had achieved full compliance with the requirements described in Attachment 2 of *Order For Compensatory Measures Related to Access*

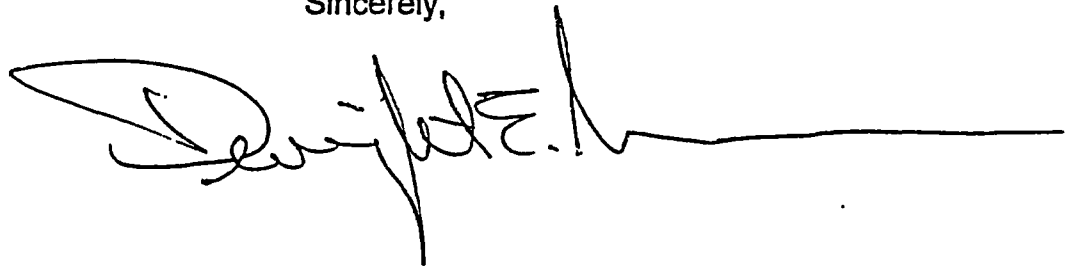
B | 11

September 3, 2004

*Authorization* made by the NRC on January 7, 2003. The access authorization measures set forth in the SONGS 2 & 3 PSP and the Compensatory Measures (CMs) related to access authorization imposed by the NRC's January 7, 2003 Order (EA-02-261) are also applied by SCE to the SONGS ISFSI. The NRC has indicated that implementing the CMs given in Attachment 2 of the NRC's January 7, 2003 Order is an acceptable alternate means of complying with this Order.

For additional information concerning SCE's response to the Order, please contact Mr. D. F. Pilmer at 949-368-1486.

Sincerely,

A handwritten signature in black ink, appearing to read "David F. Pilmer", followed by a long horizontal line extending to the right.

cc: J. R. Strosnider, Director, Office of Nuclear Material Safety and Safeguards  
B. S. Mallett, NRC Regional Administrator, Region IV  
S. C. O'Connor, NRC Project Manager, San Onofre ISFSI  
B. M. Pham, NRC Project Manager, San Onofre Units 2 and 3  
W. C. Huffman, NRC Project Manager, San Onofre Unit 1  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3