

April 13, 2006

Peter C. Riccardella, Senior Associate and
Chief Technology Officer
Structural Integrity Associates, Incorporated
6855 S. Havana Street
Suite 350
Centennial, CO 80112-3868

SUBJECT: STRUCTURAL INTEGRITY ASSOCIATES, INC. - REQUEST FOR
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2 (TAC
NO. MD0191)

Dear Mr. Riccardella:

By letter dated March 17, 2006, Southern California Edison submitted an affidavit dated March 14, 2006, executed by you, requesting that the information contained in the following drawings be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390:

1. SONGS-08Q-01, Revision 1 (3 Sheets) SO23-919-D137
2. SONGS-08Q-02, Revision 0 (3 Sheets) SO23-919-D139

Since a nonproprietary copy of this document was not submitted, the entire package sent by you, except the drawings identified above, have been placed in the Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the Agencywide Documents Access and Management System Public Electronic Reading Room.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by SI [Structural Integrity Associates, Inc.].
- (ii) The information is of a type customarily held in confidence by SI and not customarily disclosed to the public.
 - (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of SI's competitors without license from SI constitutes a competitive economic advantage over other companies.
 - (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data

secures a competitive economic advantage, e.g., by optimization or improved marketability.

- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of SI, its customers or suppliers.
- (e) It reveals aspects of past, present, or future SI or customer funded development plans and programs of potential commercial value to SI.
- (f) It contains patentable ideas, for which patent protection may be desirable.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the four drawings marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-1480.

Sincerely,

/RA/

N. Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-361

cc: See next page

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 N. Kalyanam, Project Manager
 Plant Licensing Branch IV
 Division of Operating Reactor Licensing
 Office of Nuclear Reactor Regulation

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DATE	3/30/06	3/30/06	4/5/06	4/13/06

San Onofre Nuclear Generating Station
Units 2 and 3

cc:

Mr. Daniel P. Breig
Southern California Edison Company
San Onofre Nuclear Generating Station
P. O. Box 128
San Clemente, CA 92674-0128

Mr. Douglas K. Porter, Esquire
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Mr. David Spath, Chief
Division of Drinking Water and
Environmental Management
P. O. Box 942732
Sacramento, CA 94234-7320

Chairman, Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 335
San Diego, CA 92101

Mark L. Parsons
Deputy City Attorney
City of Riverside
3900 Main Street
Riverside, CA 92522

Mr. Gary L. Nolff
Assistant Director - Resources
City of Riverside
3900 Main Street
Riverside, CA 92522

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mr. Michael R. Olson
San Diego Gas & Electric Company
8315 Century Park Ct. CP21G
San Diego, CA 92123-1548

Director, Radiologic Health Branch
State Department of Health Services
P.O. Box 997414, MS 7610
Sacramento, CA 95899-7414

Resident Inspector/San Onofre NPS
c/o U.S. Nuclear Regulatory Commission
Post Office Box 4329
San Clemente, CA 92674

Mayor
City of San Clemente
100 Avenida Presidio
San Clemente, CA 92672

Mr. James T. Reilly
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Mr. James D. Boyd, Commissioner
California Energy Commission
1516 Ninth Street (MS 31)
Sacramento, CA 95814

Mr. Ray Waldo, Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92764-0128

Mr. Brian Katz
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92764-0128

March 2006

San Onofre Nuclear Generating Station - 2-
Units 2 and 3
cc:

Mr. Steve Hsu
Department of Health Services
Radiologic Health Branch
MS 7610, P.O. Box 997414
Sacramento, CA 95899

Mr. A. Edward Scherer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Mr. Richard M. Rosenblum
Senior Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

March 2006