

February 28, 2008

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

**Subject: Docket Nos. 50-361, 50-362, 50-206, and 72-41
Response to Confirmatory Order EA 07-232 and Notice of Violation EA 07-141
Inspection Report Nos. 05000361/2007016, 05000362/2007016,
05000361/2007017, and 05000362/2007017
San Onofre Nuclear Generation Station**

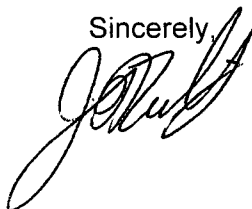
Reference: Letter, Mr. Elmo E. Collins (USNRC) to Mr. Richard M. Rosenblum (SCE), dated
January 11, 2008

Dear Sir or Madam,

The purpose of this letter is to provide Southern California Edison's (SCE's) response to Item 2 of the Confirmatory Order issued to SCE on January 11, 2008, (referenced letter). SCE's response to Item 2 of the Confirmatory Order is enclosed.

If you have any questions, please contact me or Mr. Clay E. Williams at (949) 368-6707.

Sincerely,



Enclosures: As stated

cc: E. E. Collins, Regional Administrator, Region IV
D. D. Chamberlain, Director, Division of Reactor Safety, NRC Region IV
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
K. D. Fuller, Regional Counsel/Allegation Coordination/Enforcement, NRC Region IV

ENCLOSURE
Corrective Action Plan
Docket Nos. 50-361, 50-362, 50-206, and 72-41

BACKGROUND

Item 2 of Confirmatory Order (CO) EA 07-232 requires SCE to provide the NRC with a Corrective Action Plan (CAP) to address the willful violations at San Onofre Nuclear Generating Station (SONGS). The CAP will incorporate the results of the common cause evaluation (Item 1 of the CO) as well as other key elements listed in the CO under Item 2. In addition, the CAP will include a monitoring program to determine the effectiveness of the corrective actions.

SCE RESPONSE

Based on the results of the common cause evaluation, SCE identified two categories of actions to reduce the likelihood of deliberate non-compliance at SONGS: (1) Preventive measures such as training programs and a more prescriptive discipline policy, and (2) Monitoring programs to promptly detect deliberate non-compliance. SCE compared the results of the common cause evaluation to the actions specified in the Confirmatory Order (CO) and identified no additional required actions. The elements of the Corrective Action Plan are as follows:

Preventive Measures

The preventive actions listed below focus on communicating to SONGS workers the importance and requirement of complying with procedures and regulations, reporting mistakes and deliberate non-compliance, and being honest and complete when documenting or discussing work. The consequences for not complying will also be clearly communicated in order to strengthen the safety culture attribute of accountability at SONGS. The intent of these actions is to deter occurrences of deliberate non-compliance by establishing consistent standards for acceptable behavior and applying consistent consequences for non-compliance. These actions to improve accountability are being carefully balanced with the needs of a Safety Conscious Work Environment, which provides an environment where workers feel free to report nuclear safety concerns, including mistakes and non-compliance, without fear of retaliation.

1. By June 30, 2008, SCE will conduct multi-day interventions that reinforce fundamental company values. SCE will ensure that this effort includes the elements of a strong nuclear safety culture to prevent deliberate violations. The intent of the interventions will be to focus leaders and managers on the importance of balancing accountability and encouraging workers to self-report errors and the importance of communicating this to their workers. (Confirmatory Order (CO) Item 2.b)
2. SCE will expand the Corporate Ethics Program to encompass long-term (i.e., greater than 90 days) managers and supervisors of independent contract workers at SONGS, who will be required to take the integrity training in 2008. SCE will conduct training for SONGS managers and supervisors in 2008 and other SCE SONGS employees in 2009. (CO Item 2.c)

ENCLOSURE
Corrective Action Plan
Docket Nos. 50-361, 50-362, 50-206, and 72-41

3. SCE will conduct a safety culture assessment by an independent third-party organization by April 1, 2008. By June 30, 2008, the results of this assessment will be factored into the Corrective Action Program and addressed in other ongoing related efforts, as appropriate. (CO Item 2.d)
4. By April 1, 2008, SCE will further enhance the new employee orientation and the general employee training programs to better ensure that new and periodically retrained personnel clearly understand that deliberate acts of non-compliance with regulations or procedures will not be tolerated and could result in a significant disciplinary action up to and including termination. (CO Item 2.e)
5. By April 1, 2008, SCE will enhance its existing disciplinary process to provide more detailed guidance in cases involving a deliberate misconduct-related violation. This process will communicate to the workforce specific escalating disciplinary actions that may be taken in response to initial and/or repeat deliberate misconduct by individual contributors and supervisors/managers. Communication of process enhancements will focus personnel on the importance of balancing accountability and encouraging workers to self-report errors and the importance of communicating this with their workers. (CO Item 2.g)
6. By April 1, 2008, SCE will revise the SONGS training lesson for On-the-Job Training (OJT) trainers and provide this training to all OJT trainers and trainees. The revised OJT training will reinforce the responsibilities of the trainer and the trainees. Emphasis will be placed on the expectations of a trainer while his/her trainee is performing work during an OJT session. (CO Item 2.h)
7. SCE will take steps to develop and implement incentives for on-site service contractors to help SCE address the issues that have resulted in deliberate misconduct-related violations. If SCE is unable to negotiate acceptable programs by a particular contractor, then SCE will impose additional oversight to ensure the performance of the contractor and its personnel meets specified criteria. (CO Item 2.i)
8. SCE will use multiple site-wide communication tools to emphasize to employees and contractors at SONGS the need to comply with job rules, regulations, and procedures and potential consequences when compliance does not occur. (CO Item 2.l)

Monitoring Program

The purpose of the monitoring program is to enable supervision to effectively motivate workers to comply with requirements and to promptly identify deliberate non-compliance if it does occur. In addition, the data resulting from the monitoring program will be used to assess the effectiveness of this Corrective Action Plan. As described below, the monitoring program being established by SCE includes: (1) surveillances and (2) a reporting and evaluation process.

1. By April 1, 2008, SCE will incorporate into the SONGS oversight surveillance program, periodic sampling of repetitive rounds and log keeping activities to provide reasonable assurance that actions to deter and detect instances of deliberate non-compliance are effective. This oversight will include sampling of SCE and contractor activities. (CO Item 2.j)

ENCLOSURE
Corrective Action Plan
Docket Nos. 50-361, 50-362, 50-206, and 72-41

2. To identify and track occurrences of deliberate non-compliance, SCE will
(a) reemphasize to SONGS workers the requirement and processes to report mistakes and deliberate non-compliance, (b) evaluate reports of mistakes and deliberate non-compliance to identify potential willful violations of NRC requirements, (c) trend results, and (d) assess the effectiveness of the Corrective Action Plan. (CO Item 2.a)

The above actions are being tracked in SCE's Corrective Action Program under Action Request 071200432.