

March 28, 2008

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

Subject: **Docket Nos. 50-361 and 50-362**
Letter of Intent to Adopt NFPA 805, Performance-Based Standard for
Fire Protection for Light Water Reactor Electric Generating Plants,
2001 Edition
San Onofre Nuclear Generating Station, Units 2 and 3

Dear Sir or Madam:

This letter is to confirm that Southern California Edison (SCE) intends to adopt National Fire Protection Association (NFPA) Standard 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition, in accordance with 10 CFR 50.48(c) for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3.

SONGS is beginning the transition to the performance-based standard for fire protection in March, 2008. It is expected to take approximately thirty-six months to develop the license amendment request.

The SONGS NFPA 805 transition consists of three phases:

Phase 1 – Preliminary Assessment of the Fire Protection Program

- Assessment to determine the scope of activities and resources needed to perform the transition

Phase 2 – Reviews and Engineering Analysis

- Fire Probabilistic Risk Assessment
- Fundamental Fire Protection Program and Design Elements Assessment
- Radioactive Release Assessment
- Nuclear Safety Capability Assessment
- Non-Power Operational Modes Assessment
- Development of Change Evaluations and Transition Report
- Submittal of License Amendment Request

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Phase 3 – Implementation

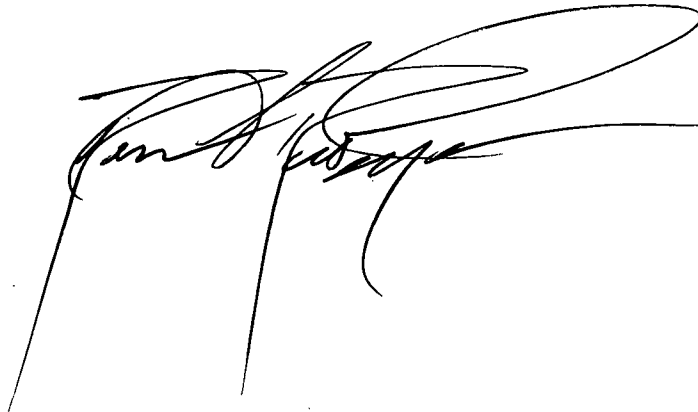
- Completion of Program Documentation Changes

The process will be considered complete upon receipt of the License Amendment authorizing the transition to NFPA 805.

The NRC Interim Enforcement Discretion Policy (71 FR 19905, April 18, 2006, and Regulatory Guide 1.205, May 2006) established NRC policy regarding enforcement discretion for certain noncompliances related to fire protection programs and the transition to 10 CFR 50.48(c). As outlined in the Enforcement Policy, enforcement discretion begins with the licensee's letter of intent. The Enforcement Policy also provides for extension of the discretion period if adequate justification is provided.

For additional information, please contact Ms. Linda T. Conklin at 949-368-9443.

Sincerely,

A handwritten signature in black ink, appearing to read "E. E. Collins", with a large, sweeping flourish extending from the end of the signature.

cc: E. E. Collins, Regional Administrator, NRC Region IV
N. Kalyanam, NRC Project Manager, San Onofre Units 2 & 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 & 3