



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

April 29, 2008

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

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 - NRC
INSPECTION REPORT 05000361/2006010; 05000362/2006010

Dear Mr. Rosenblum:

The purpose of this letter is to follow up on conversations between Messrs. Ryan Lantz, Chief, Operations Branch, and David Axline, Compliance Engineer, San Onofre Nuclear Generating Station (SONGS), on April 16, 2008, and Mr. Clay Williams, Manager, Compliance, SONGS, on April 21, 2008, regarding the August 18, 2006, U.S. Nuclear Regulatory Commission (NRC) inspection at SONGS, Units 2 and 3. The report of that inspection discussed the NRC's evaluation of your plant simulator, specifically to address an unresolved item (05000361; 362/2005302-02).

The August 2006 inspection report documented the NRC's conclusion that the simulator models used for training during Cycle 13 had: 1) adequate fidelity for use in both the administration of the operating test and crediting experience requirements for license applicants (control manipulation credits), and 2) met the requirements contained in 10 CFR 55.46(c)(3). The report went on to describe certain simulator analysis, testing, and documentation problems, and closed the unresolved item.

Upon further review, we have concluded that the simulator models for SONGS, Unit 2, used for Cycle 13 did have adequate fidelity for requalification training conducted for licensed operators and for use in the administration of the NRC's October 2005, initial license operating tests. However, the simulator did not have sufficient fidelity, pursuant to 10 CFR 55.46(c)(3), for use in meeting the requirements for control manipulations in accordance with 10 CFR 55.31(a)(5). NRC Inspection Report 2006010 characterized differences between the SONGS Unit 2 plant-referenced simulator and its reference plant as weaknesses in your analysis and documentation, rather than as a deficiency in your testing to ensure that the simulator core model replicated, at all plant power levels, the most recent core load of the reference plant. Specifically, low power physics testing was not conducted in a manner to adequately demonstrate fidelity with the reference plant, and simulator fidelity issues did exist, constituting a violation of 10 CFR 55.46(c)(3).

NRC management review has determined that the significance of the violation is minor. Although minor violations are typically not documented (and not subject to enforcement action), the NRC, nevertheless, deemed it necessary to correct the basis of its characterization of the deficiency as cited in the referenced inspection report. As such, a response by you to this letter is not required. The NRC also notes that 1) you took timely and adequate corrective actions to restore compliance by ensuring that Cycle 14 and later simulator testing and documentation would meet the requirements of 10 CFR 55.46(c)(3), 2) the simulator was not used by license applicants in 2005 for control manipulation experience where fidelity was an issue, and 3) there were no observed adverse impacts on licensed operator performance during Cycle 13.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Roy J. Caniano, Director
Division of Reactor Safety

Dockets: 50-361; 50-362
Licenses: NPF-10; NPF-15

cc:
Mr. Ross T. Ridenoure
Vice President and Site Manager
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

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

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

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

Dr. David Spath, Chief
Division of Drinking Water and
Environmental Management
California Department of Health Services
850 Marina Parkway, Bldg P, 2nd Floor
Richmond, CA 94804

Michael J. DeMarco
San Onofre Liaison
San Diego Gas & Electric Company
8315 Century Park Ct. CP21G
San Diego, CA 92123-1548

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

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

James D. Boyd, Commissioner
California Energy Commission
1516 Ninth Street (MS 34)
Sacramento, CA 95814

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

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

Southern California Edison Company - 4 -

Mr. Steve Hsu
Department of Health Services
Radiologic Health Branch
MS 7610, P.O. Box 997414
Sacramento, CA 95899-7414

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

Chief, Radiological Emergency Preparedness Section
National Preparedness Directorate
Technological Hazards Division
Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Electronic distribution by RIV:
 Regional Administrator (Elmo.Collins@nrc.gov)
 DRP Director (Dwight.Chamberlain@nrc.gov)
 DRS Director (Roy.Caniano@nrc.gov)
 DRS Deputy Director (Troy.Pruett@nrc.gov)
 Senior Resident Inspector (Clyde.Osterholtz@nrc.gov)
 Branch Chief, DRP/D (Michael.Hay@nrc.gov)
 Senior Project Engineer, DRP/D (Greg.Werner@nrc.gov)
 Senior Project Engineer, DRP/D (Geoff.Miller@nrc.gov)
 Team Leader, DRP/TSS (Chuck.Paulk@nrc.gov)
 RITS Coordinator (Marisa.Herrera@nrc.gov)

Nancy Salgado
 Bruce Boger
 Pat Hiland
 Stu Richards
 Cindi Carpenter
 Stu Magruder
 Dave Solorio
 Shahram Ghasemian
 Mike Vasquez
 Larry Vick
 MaryAnn Ashley

SUNSI Review Completed: Y ADAMS: Yes No Initials: lmb
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