

July 10, 2008

Mr. Mr. Ross T. Ridenoure
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 -
REQUEST FOR ADDITIONAL INFORMATION RE: NRC BULLETIN 2007-01
"SECURITY OFFICER ATTENTIVENESS" (TAC NOS. MD7649 AND MD7650)

Dear Mr. Ridenoure,

By letter dated February 11, 2008, Southern California Edison (the licensee) submitted the required written response to the U.S. Nuclear Regulatory Commission (NRC) Bulletin 2007-01 "Security Officer Attentiveness" for the San Onofre Nuclear Generating Station, Units 2 and 3. The response was submitted to the NRC in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) and 10 CFR 70.22(d).

The NRC staff has reviewed your submittal and has determined that additional information is needed to complete the final staff assessment of the licensee response to the NRC Bulletin 2007-01. NRC Bulletin 2007-01 requested licensees to provide information regarding administrative and managerial programs and controls established to prevent, identify and correct 1) security personnel inattentiveness and complicity, and 2) failures to implement the behavioral observation program for licensee security personnel including security contractors and subcontractors. The NRC staff will use the additional information received to inform the Commission and to determine if further regulatory action is warranted or if additional assessment of licensee program implementation is needed.

The specific information requested is addressed in the enclosure to this letter. Responses are requested within 35 days of the issuance of this letter. Before submitting responses to the NRC, licensees must evaluate them for proprietary, sensitive, safeguards, or classified information and mark such information appropriately.

R. T. Ridenoure

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If you have any question, please contact me at 301-415-1480.

Sincerely,

/RA/Jack Donohew for

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

Docket No. 50-361 and 50-362

Enclosure: Request for Additional Information

cc w/encl: See next page

R.T. Ridenoure

- 2 -

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Docket No. 50-361 and 50-362

Enclosure: Request for Additional Information

cc w/encl: See next page

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San Onofre Nuclear Generating Station
Units 2 and 3

(June 2008)

cc:

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San Clemente, CA 92674-0128

OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
RELATED TO RESPONSE TO NRC BULLETIN 2007-01,
"SECURITY OFFICER ATTENTIVENESS"
SOUTHERN CALIFORNIA EDISON COMPANY
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
DOCKET NOS. 50-361 AND 50-362

In responding to each of the following questions, licensee should provide information that addresses measures that are currently in place, and any additional planned actions with expected completion dates:

The NRC staff reviewed your response to Question 1b. and requests the following additional information:

1. Describe any licensee processes or programs that are in place to identify problems in climate controlled security areas. What methods are used to track, inspect, and ensure timely repairs are completed?

Include the following information in your response:

A description of how the security areas are maintained including, but not limited to: (1) a discussion of the maintenance and/or preventive maintenance process and programs in place for these security areas including an overview and brief discussion on routine inspection schedules by maintenance personnel; (2) a discussion on the process a security officer can follow to report concerns with the up keep and maintenance of his or her post; and, (3) a discussion on the timeliness of repairs and any follow up actions taken by the licensee to ensure the repairs are completed and resolved adequately.

The NRC staff reviewed your response to Question 1c. and requests the following additional information:

2. What is the level of involvement from management who do not have direct responsibility for the security program (including executive and corporate management) in conducting behavior observations of security personnel?

Include the following information in your response:

A description of any processes in place for licensee and/or contract management, who work day to day at the site or visit the site on a routine basis from a corporate office or other applicable offsite location, for conducting behavior observations of security personnel while on duty at their assigned posts. Examples should include, but are not limited to, a discussion of random or scheduled observations conducted by licensee and/or contract management such as the Plant

Operations Shift Managers or other Plant Operations Shift Supervisors, Plant Maintenance Supervisors (licensee and contractor), or Quality Assurance Supervisors etc. The discussion should include whether these random or scheduled observations are proceduralized and the required or recommended level of licensee and/or contract management involvement.

The NRC staff reviewed your response to Question 1 and requests the following additional information:

3. How is the licensee's policy regarding site employee attentiveness and/or inattentiveness communicated to personnel, both licensee and contractor, and at what frequency?

The NRC staff reviewed your response to Question 2 and requests the following additional information:

4. Describe the process for employees to file reports through the site corrective action program (CAP). Can employees file CAP reports without prior supervisory/management review or approval?

Include the following information in your response:

Describe the process for employees to file reports through the CAP. Discuss the supervisor/management review and/or approval process including, but not limited to: (1) does a supervisor/manager have the authority to reject a report before entering it into the corrective action program without additional management review and approval; and, (2) does a supervisor/manager have the authority to modify the report before such report has been entered into the CAP.

5. Can the employees view the status and disposition of reports directly, or must this information be requested? If yes, please describe the process.

The NRC staff reviewed your response to Question 4 and requests the following additional information:

6. Are formal assessments of the security program conducted by organizations/individuals that do not have direct responsibility for the security program? If so, provide information on the process, including, but not limited to, the organizations and levels of management involved, the frequency of such activities, and any tracking of how findings are resolved.

The NRC staff reviewed your response to Question 5 and requests the following additional information:

7. How do you assess the effectiveness of your oversight of contractors and subcontractors?

Include the following information in your response:

Describe the licensees' program for oversight of contractors and subcontractors including, but not limited to: (1) a brief overview and description of licensee's procedures that describe the oversight process; (2) include a detailed list (bulleted is preferred) of assigned duties for the licensee supervisor(s) or manager(s) responsible for overseeing contractors and subcontractors at the site; (3) include a detailed list (bulleted is preferred) of the assigned duties for the contractor and subcontractor supervisor(s) or manager(s) responsible for overseeing the contractor and subcontractor staff at the site; and, (4) a brief discussion of the corporate (management) involvement with the oversight of contractors and subcontractors at the site.