

Security-Related Information—Withhold from Public Disclosure
In Accordance with 10 CFR 2.390(d)(1)

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February 27, 2009

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: **Docket Nos. 50-361 and 50-362**
Revised No Significant Hazards Analysis for
Amendment Application Numbers 253 and 239
San Onofre Nuclear Generating Station, Units 2 and 3

References: (A) Southern California Edison letter to the U.S. Nuclear Regulatory Commission, Subject: San Onofre Nuclear Generating Station, Units 2 and 3 (December 8, 2008)

(B) Southern California Edison letter to the U.S. Nuclear Regulatory Commission, Subject: Amendment Application Numbers 253 and 239, Proposed Change Number NPF-10/15-588, Physical Security Plan Change for SG Replacement, San Onofre Nuclear Generating Station, Units 2 and 3 (January 13, 2009)

(C) Southern California Edison letter to the U.S. Nuclear Regulatory Commission, Subject: Amendment Application Numbers 253 and 239, San Onofre Nuclear Generating Station, Units 2 and 3 (February 6, 2009)

Dear Sir or Madam:

Southern California Edison (SCE) hereby submits a revised No Significant Hazards Analysis for Amendment Application Numbers 253 and 239 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, respectively.

Reference (A) submitted proposed changes to the Physical Security Plan (PSP) for SONGS needed to support steam generator replacement (SGR) project activities at SONGS 2 and 3, for review and approval under 10 CFR 73.55(a). A description of the security related effects of the SGR project and a discussion of the details of the security measures to be implemented were provided in

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Enclosure (1) to Reference (A). The proposed changes to the PSP were provided as Enclosure (2) to Reference (A).

Reference (B) submitted Proposed Change Number NPF-10/15-588 for phased review and approval of the Reference (A) PSP changes for the SGR project under 10 CFR 50.90. Enclosure (1) to Reference (B) provided the description and No Significant Hazards Analysis for the proposed change.

Reference (C) provided schedule information for phased review and approval of Proposed Change Number NPF-10/15-588, and clarified which portions of the proposed PSP changes qualify under 10 CFR 50.54(p) and which require approval under 10 CFR 50.90.

SCE subsequently determined that the No Significant Hazards Analysis provided by Reference (B) needed to be revised to clarify the basis for the margin of safety determination. The revised No Significant Hazards analysis for Proposed Change Number NPF-10/15-588 is provided as Enclosure (1) to this letter.

SCE has determined that there are no significant hazards considerations associated with the proposed change and that the change is exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/27/09
(Date)

Sincerely,

A handwritten signature in black ink, appearing to be "A. E. [unclear]", written in a cursive style.

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cc (with Enclosure):

R. P. Zimmerman, Director, NRC Nuclear Security and Incident Response
N. Kalyanam, NRC Project Manager, San Onofre Units 2 & 3
E. E. Collins, Regional Administrator, NRC Region IV
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. P. Shannon, Plant Support Branch Chief, NRC Region IV
J. R. Johnson, NRC NSIR Reactor Security Rulemaking and Licensing Branch
F. P. Peduzzi, NRC NSIR Reactor Security Oversight Branch
D. G. Huyck, NRC NSIR Reactor Security

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ENCLOSURE (1)

Description and No Significant Hazards Analysis
For Proposed Change NPF-10/15-588
San Onofre Nuclear Generating Station
Units 2 and 3

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