

April 1, 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
For Public Disclosure
San Onofre Nuclear Generating Station, Units 2 and 3

References: (1) Letter from A. E. Scherer (SCE) to Document Control Desk (NRC), dated December 8, 2008, Subject: San Onofre Nuclear Generating Station, Units 2 and 3

(2) Letter from A. E. Scherer (SCE) to Document Control Desk (NRC), dated January 13, 2009, 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

(3) Letter from A. E. Scherer (SCE) to Document Control Desk (NRC), dated February 27, 2009, Subject: Revised No Significant Hazards Analysis for Amendment Application Numbers 253 and 239, San Onofre Nuclear Generating Station, Units 2 and 3

Dear Sir or Madam:

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

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

Reference (2) submitted Proposed Change Number NPF-10/15-588 for phased review and approval of the Reference (1) PSP changes for the SGR project under 10 CFR 50.90. Enclosure (1) to Reference (2) provided the description and No Significant Hazards Analysis for the proposed change.

SCE subsequently determined that the No Significant Hazards Analysis provided by Reference (2) 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 was provided as Enclosure (1) to Reference (3). Enclosure (1) to Reference (3), however, was requested to be withheld from public disclosure due to sensitive security-related information that was not part of the revised No Significant Hazards analysis. Because of this, the revised No Significant Hazards analysis was not available for the public notice of a proposed license amendment that is required by 10CFR50.91.

The enclosure to this letter provides a version of Enclosure (1) to Reference (3) with the security-related information removed. As such, the enclosure provides a copy of the revised No Significant Hazards analysis in a form that does not need to be withheld from public disclosure.

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). There is no change to this determination as a result of this letter.

There are no new commitments associated with this letter.

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

Executed on 4/1/09
(Date)

Sincerely,

A handwritten signature in black ink, appearing to read "D. E. Schaefer", is written below the word "Sincerely,".

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

ENCLOSURE (1)

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

LICENSEE'S EVALUATION

Description and No Significant Hazards Analysis For Proposed Change NPF-10/15-588 Physical Security Plan Change for SG Replacement San Onofre Nuclear Generating Station, Units 2 and 3

1.0 INTRODUCTION

Changes are proposed to the San Onofre Nuclear Generating Station (SONGS) Physical Security Plan (PSP) to address physical security impacts of the Steam Generator Replacement (SGR) project.

2.0 PROPOSED CHANGES

Southern California Edison (SCE) proposes addition of a temporary Section 14.3 to the SONGS PSP for security measures to be used to address the physical security impacts of the SGR project. Upon completion of the SGR project, Section 14.3 will no longer be in effect and will be deleted.

The bases for the temporary security measures to be used for the SGR project were provided as Enclosure (1) to [Reference 7.1]. Proposed temporary Section 14.3 to the SONGS PSP was provided as Enclosure (2) to [Reference 7.1]. Enclosures (1) and (2) to [Reference 7.1] are Safeguards Information.

3.0 BACKGROUND

The SONGS SGR project will remove and replace the steam generators in Unit 2 and Unit 3. Temporary security measures will be required to address the physical security impacts of the SGR project activities.

4.0 TECHNICAL ANALYSIS

As discussed in Enclosure (1) to [Reference 7.1], the temporary security measures to be implemented for the SGR project will meet the requirements of 10 CFR 73.55(a) by maintaining a high level of assurance against radiological sabotage equivalent to that provided by existing physical security measures.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

Southern California Edison (SCE) has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment", as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change is limited to temporary security measures that will be implemented to maintain high assurance of protection against radiological sabotage during Steam Generator Replacement (SGR) at San Onofre Nuclear Generating Station (SONGS) Units 2 and 3.

The proposed change to the PSP will not affect the probability of any accident initiators. There will be no degradation in the performance of, or an increase in the number of challenges imposed on, safety-related equipment assumed to function during an accident. There will be no change to accident mitigation performance. The proposed change will not alter any assumptions or change any mitigation actions in the radiological consequence evaluations in the Updated Final Safety Analysis Report (UFSAR).

The proposed change does not affect the probability of occurrence or consequences of an accident previously evaluated because it relates solely to physical security features.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change is limited to temporary security measures that will be implemented to maintain a high level of assurance against radiological sabotage during Steam Generator Replacement (SGR) at San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. This will not introduce any adverse changes to the plant design basis or postulated accidents.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change is limited to temporary security measures that will be implemented to maintain a high level of assurance against radiological sabotage

during Steam Generator Replacement (SGR) at San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. No margins of safety are affected.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of no significant hazards consideration is justified.

5.2 Applicable Regulatory Requirements/Criteria

The applicable regulatory requirements and criteria associated with the proposed change to the Physical Security Plan are delineated by 10 CFR 73.55. As discussed in Enclosure (1) to [Reference 7.1], the proposed temporary security measures will meet the requirements of 10 CFR 73.55(a) by maintaining a high level of assurance against radiological sabotage, equivalent to that provided by existing physical security measures.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense or security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with these proposed amendments.

7.0 REFERENCES

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