

December 17, 2009

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

**SUBJECT: Docket Nos. 50-361 and 50-362  
Request for Exemption from Physical Security Requirements  
San Onofre Nuclear Generating Station, Units 2 and 3**

Dear Sir or Madam:

In accordance with the requirements of 10 CFR 73.5, Southern California Edison (SCE) hereby requests the Nuclear Regulatory Commission (NRC) to approve an exemption from specific requirements of 10 CFR 73, "Physical Protection of Plants and Materials", for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, by extending the due date for the implementation of certain measures.

The NRC issued a Final Rule for security requirements in the Federal Register dated March 27, 2009. Pursuant to the Final Rule, upgrades to meet the new security requirements must be implemented by March 31, 2010. SCE has determined that specific upgrades to meet the new requirements will require more time to implement.

Enclosure 1 to this letter describes: the specific new requirements of the Final Rule for which an exemption from the due date is requested; the existing capability of the SONGS security system with respect to those requirements; the upgrades being performed to meet those requirements, including the dates for completion; and a description of how a high level of assurance will be maintained until the upgrades are complete.

Enclosure 2 to this letter contains supporting information for the requested exemption, including drawings, photographs, and schedules.

Enclosure 3 to this letter contains an environmental assessment of the requested exemption.

SCE is requesting, for a limited scope of upgrades, that the implementation due date be extended to the dates identified in Enclosure 1. Pending NRC approval, SCE commits to the implementation dates identified in Enclosure 1.

A Safeguards Information version of this letter was signed and submitted to the NRC on this date.

In accordance with 10 CFR 73.5, this exemption is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest.

SCE requests approval of this exemption by March 1, 2010. The exemption is requested to be effective upon issuance.

If you should have any questions regarding this submittal, please contact Mr. S. D. Root at 949-368-6480.

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

Executed on 12/17/09



Enclosures (3)

cc: (with Enclosures)

R. Hall, 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

ENCLOSURE 1

San Onofre Nuclear Generating Station, Units 2 and 3  
Request for Exemption from Physical Security Requirements

ENCLOSURE 1  
San Onofre Nuclear Generating Station Units 2 and 3  
Request for Exemption from Physical Security Requirements

A. Specific Requirements of Part 73 for which an Exemption is Requested

Southern California Edison (SCE) requests an exemption, from the March 31, 2010 implementation due date only, for implementing two specific requirements of 10 CFR 73.55 at San Onofre Nuclear Generating Station (SONGS):

1. [ ... ]

Specific requirement that cannot be met by March 31, 2010: [ ... ]

Proposed implementation due date: SCE requests that the SONGS implementation due date for this requirement be extended to [ ... ].

2. [ ... ]

Specific requirement that cannot be met by March 31, 2010: [ ... ]

Proposed implementation due date: SCE requests that the SONGS implementation due date for this requirement be extended to [ ... ].

B. Existing Capability of SONGS Security System

1. [ ... ]

2. [ ... ]

3. [ ... ]

4. [ ... ]

C. Upgrades Being Performed to Meet Above Requirements

1. [ ... ]

As a result, SCE no longer expects to complete [ ... ] by March 31, 2010. However, as shown in Enclosure 2 Attachments 3 and 4, [ ... ]. The critical path work remains [ ... ] as described in Section C.2 below.

2. [ ... ]

Even with expedited ordering, [ ... ] will not be available until after March 31, 2010. [ ... ]

As shown in Enclosure 2 Attachments 3 and 4, [ ... ]

ENCLOSURE 1  
San Onofre Nuclear Generating Station Units 2 and 3  
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SCE commits to complete this work [ ... ].

3. [ ... ]

As shown in Enclosure 2 Attachments 3 and 4, [ ... ]

SCE commits to complete this work [ ... ].

D. How High Assurance Will Be Maintained

High assurance of public health and safety and common defense and security will be maintained while the above upgrades are being completed, as described below:

1. [ ... ]

2. [ ... ]

3. [ ... ]

ENCLOSURE 2

San Onofre Nuclear Generating Station, Units 2 and 3  
Supporting Information for Exemption from Physical Security Requirements

## ENCLOSURE 2

Enclosure 2 contains the following supporting information for the requested exemption from Physical Security Requirements:

Attachment 1 – Plant Area Security Drawing

Attachment 2 – Photographs

Attachment 3 – Implementation Timeline for Applicable Work Activities

Attachment 4 – Schedule Snapshot for Applicable Work Activities

ENCLOSURE 2

Attachment 1

Plant Area Security Drawing

ENCLOSURE 2

Attachment 1

[ ... ]

ENCLOSURE 2

Attachment 2

Photographs

ENCLOSURE 2

Attachment 2

[ ... ]

ENCLOSURE 2

Attachment 3

Implementation Timeline for Applicable Work Activities

ENCLOSURE 2

Attachment 3

[ ... ]

ENCLOSURE 2

Attachment 4

Schedule Snapshot for Applicable Work Activities

ENCLOSURE 2

Attachment 4

[ ... ]

**ENCLOSURE 3**

**San Onofre Nuclear Generating Station, Units 2 and 3  
Environmental Assessment for Exemption from Physical Security Requirements**

## ENCLOSURE 3

### San Onofre Nuclear Generating Station, Units 2 and 3 Environmental Assessment for Exemption from Physical Security Requirements

1. Describe any change to the types, characteristics, or quantities of non-radiological effluents discharged to the environment as a result of the proposed exemptions.

#### **SCE Response**

There are no expected changes in the types, characteristics, or quantities of non-radiological effluents discharged to the environment associated with the proposed exemptions. This application is associated with the implementation schedule for security changes required by 10 CFR 73.55. These security changes will not result in changes to the design basis requirements for the structures, systems, and components (SSCs) at the San Onofre Nuclear Generating Station (SONGS) that function to limit the release of non-radiological effluents during and following postulated accidents. All the SSCs associated with limiting the release of offsite non-radiological effluents will therefore continue to be able to perform their functions. As a result, there is no significant non-radiological effluent impact. There are no materials or chemicals introduced into the plant that could affect the characteristics or types of non-radiological effluents. In addition, the method of operation of non-radiological waste systems will not be affected by these proposed exemptions.

2. Describe any changes to liquid radioactive effluents discharged as a result of the proposed exemptions.

#### **SCE Response**

There are no expected changes to the liquid radioactive effluents discharged as a result of these proposed exemptions. The proposed exemptions will not interact to produce any different quantity or type of radioactive material in the reactor coolant system. These proposed exemptions will not result in changes to the design basis requirements for the SSCs at the SONGS that function to limit the release of liquid radiological effluents during and following postulated accidents. All SSCs associated with limiting the release of liquid radiological effluents will therefore continue to be able to perform their functions. As a result, there is no significant liquid radiological effluent impact.

3. Describe any changes to gaseous radioactive effluents discharged as a result of the proposed exemptions.

#### **SCE Response**

For the same reasons as described in number 2 above, these proposed exemptions would have no effects on the characteristics of gaseous radioactive effluents.

## ENCLOSURE 3

### San Onofre Nuclear Generating Station, Units 2 and 3 Environmental Assessment for Exemption from Physical Security Requirements

4. Describe any change in the type or quantity of solid radioactive waste generated as a result of the proposed exemptions.

#### **SCE Response**

These proposed exemptions will not result in changes to the design basis requirements for the structures, systems, and components (SSCs) at the SONGS that function to limit the release of solid waste during and following postulated accidents. All SSCs associated with limiting the release of solid radioactive waste will therefore continue to be able to perform their function. Radiation surveys will be performed in accordance with plant radiation protection procedures on excavated dirt that could be contaminated, such as inside the protected area or radiation control areas, that will be disposed of offsite. Any contaminated dirt will be handled in accordance with plant procedures. SONGS has a radiation survey program and procedures to handle any contaminated excavated soil that is inside the protected area or radiation control areas.

5. What is the expected change in occupational dose as a result of the proposed exemptions under normal and design basis accident conditions?

#### **SCE Response**

Under normal power operation there would be no expected radiological impact on the workforce. There are no other expected changes in normal occupational operating doses. Control room dose is not impacted by the proposed exemptions and would not impact occupational dose.

6. What is the expected change in the public dose as a result of the proposed exemptions under normal and Design Basis Accident (DBA) conditions?

#### **SCE Response**

Dose to the public will not be changed by the proposed exemptions during normal operations or DBA conditions. As noted in items 2, 3 and 4 above there is no basis to contemplate an increased source of liquid, gaseous or solid radiological effluents that could contribute to increased public exposure during normal operations and DBA conditions. The proposed security changes do not impact systems used during normal operation nor systems used to detect or mitigate a DBA.

## ENCLOSURE 3

### San Onofre Nuclear Generating Station, Units 2 and 3 Environmental Assessment for Exemption from Physical Security Requirements

7. What is the impact to land disturbance for the proposed exemptions?

#### **SCE Response**

The proposed exemptions concern the implementation schedule for specific security changes required by 10 CFR 73.55. These specific security changes will be implemented within previously disturbed areas of the SONGS site that are not environmentally sensitive.

A SONGS environmental survey of sensitive areas has previously been completed and environmentally sensitive areas have been identified. SONGS procedure SO123-IX-2.9 addresses land disturbance, including endangered or threatened plant, habitat, and archaeological assessments.

Conclusion:

There is no significant radiological environmental impact associated with the proposed exemptions at SONGS. These proposed changes will not affect any historical sites nor will they affect non-radiological plant effluents.