

June 14, 2010

E. E. Collins, Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
612 East Lamar Blvd, Suite 400
Arlington, TX 76011-4125

Subject: **Docket Nos. 50-361 and 50-362**
Change to Commitments for Shift Technical Advisor Program
San Onofre Nuclear Generating Station, Units 2 and 3

- References:
1. April 26, 2010 letter from R. St. Onge (SCE) to E. E. Collins (NRC), Subject: Docket Nos. 50-361 and 50-362, Change to Commitments for Shift Technical Advisor Program, San Onofre Nuclear Generating Station, Units 2 and 3
 2. Commission Policy Statement on Engineering Expertise on Shift, 50 FR 43621, published 10/28/85

Dear Sir or Madam:

In Reference 1, Southern California Edison (SCE) committed to the NRC that Shift Technical Advisors (STAs) at the San Onofre Nuclear Generating Station (SONGS) will:

1. Hold a plant specific SRO license or SRO certification prior to performing STA duties, and
2. Have a Bachelor's degree in engineering, a Professional Engineer's license, a Bachelor's degree in engineering technology (including coursework in the physical, mathematical, or engineering sciences), or a Bachelor's degree in a physical science (including coursework in the physical, mathematical, or engineering sciences).

SCE has reassessed this commitment recognizing that the combined items 1 and 2 above go beyond the requirements of the NRC's policy statement regarding the STA position (Reference 2). SCE is now revising this commitment to be consistent with the NRC's policy statement.

From July 1, 2010 forward, individuals filling the STA position at SONGS will comply with Option 2 of the Commission Policy Statement on Engineering Expertise on Shift, 50 FR 43621, published on October 28, 1985. Option 2 states:

"This option is satisfied by placing on each shift a dedicated Shift Technical Advisor (STA) who meets the STA criteria of NUREG-0737, Item I.A.1.1. The STA should assume an active role in shift activities. For example, the STA should review plant logs, participate in shift turnover activities, and maintain an awareness of plant configuration and status."

The STA criteria of NUREG-0737, Item I.A.1.1 states:

"The STA shall have a bachelor's degree or equivalent in a scientific or engineering discipline and have received specific training in the response and analysis of the plant for transients and accidents. The STA shall also receive training in plant design and layout, including the capabilities of instrumentation and controls in the control room. The licensee shall assign normal duties to the STAs that pertain to the engineering aspects of assuring safe operation of the plant, including the review and evaluation of operating experience."

The SONGS STA training program contains each of the referenced elements of the Commission Policy Statement and Item I.A.1.1 of NUREG-0737. Presently, SONGS STAs have either an SRO license or SRO certification training. The SRO Certification training program is already established at SONGS and provides training similar to the SRO License training program to establish baseline plant operations knowledge and capabilities, with the exception that the SRO Certification training program does not require exams monitored by the NRC or require the same number of Extra Person On Shift (EPOS) hours. This level of training and certification for STAs is consistent with the Commission Policy Statement (Reference 2).

This revised commitment is consistent with the SONGS Technical Specification Sections 5.2.1 and 5.3.1 and is consistent with the Standard Technical Specifications.

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SCE has evaluated this commitment change and has determined that it is consistent with its internal commitment management procedure. SCE will revise the corresponding UFSAR section during the normal revision cycle.

If you have any questions, please contact Mr. Clay Williams at 949-368-6707.

Sincerely,

A handwritten signature in cursive script, appearing to read "E. E. Collins".

cc: R. Hall, NRC Project Manager, San Onofre Units 2 and 3
M. S. Haire, NRC Chief Operations Branch, Region IV
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3
U. S. NRC Document Control Desk