

October 17, 2010

10 CFR 73.5

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

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

- References: (A) SCE (A. E. Scherer) letter to NRC dated December 13, 2009,
Subject: Request for Exemption from Physical Security
Requirements, San Onofre Nuclear Generation Station,
Units 2 and 3
- (B) NRC (J. R. Hall) letter to SCE (R. T. Ridenoure) dated March 16,
2010, Subject: San Onofre Nuclear Generating Station, Units 2
and 3 – Exemption from the Requirements of 10 CFR Part 73,
Section 55 (TAC Nos. ME3022 and ME3032)
- (C) SCE (R. J. St Onge) letter to NRC dated August 24, 2010,
Subject: Request for Exemption from Physical Security
Requirements, San Onofre Nuclear Generation Station,
Units 2 and 3

Dear Sir or Madam:

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 were required to be implemented by March 31, 2010. In Reference (A), SCE requested additional time to implement specific upgrades to meet the new requirements. The NRC approved the requested exemptions in Reference (B). In Reference (C), SCE requested additional time, beyond the currently approved exemption dates, to complete the specific upgrades described in Reference (A).

In discussions with the NRC staff during the weeks of September 27, 2010 and October 4, 2010, SCE determined that additional information is needed to supplement the Reference (C) request.

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Enclosure 1 to this letter contains supplemental information on the requested exemptions from the due date of the Final Rule, and revised commitment dates for completion.

Enclosure 2 to this letter contains supplemental information on the schedule for completion of the upgrades needed to comply with the Final Rule, including additional details on the critical path activities.

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

A Safeguards Information version of this letter was signed and submitted to the NRC on this date. Safeguards and Security-Related Information has been removed from this letter and it may be made available for public disclosure.

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: October 17, 2010



Richard J. St. Onge

Enclosures (2)

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
Supplement to Request for Exemption from Physical Security Requirements**

ENCLOSURE 1

- References: (A) SCE (A. E. Scherer) letter to NRC dated December 13, 2009, Subject: Request for Exemption from Physical Security Requirements, San Onofre Nuclear Generation Station, Units 2 and 3
- (B) NRC (J. R. Hall) letter to SCE (R. T. Ridenoure) dated March 16, 2010, Subject: San Onofre Nuclear Generating Station, Units 2 and 3 – Exemption from the Requirements of 10 CFR Part 73, Section 55 (TAC Nos. ME3022 and ME3032)
- (C) SCE (R. J. St. Onge) letter to NRC dated August 24, 2010, Subject: Request for Exemption from Physical Security Requirements, San Onofre Nuclear Generating Station, Units 2 and 3

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: [...]

The References (A) and (C) exemption requests from the March 31, 2010 implementation date for this requirement [...].

SONGS [...] in accordance with this requirement since prior to March 31, 2010. Consequently, an exemption from the March 31, 2010 implementation date for this requirement is no longer needed.

Exemption: SCE hereby withdraws the request for exemption from the March 31, 2010 due date for implementing [...] at SONGS.

2. [...]

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

Reference (A) previously requested and Reference (B) approved moving the SONGS due date for this requirement to [...].

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

ENCLOSURE 1

B. Upgrades Being Performed to Meet Above Requirements

As described in Enclosure 2 Attachment 1 to this Exemption Request, there have been significant material/supply delays affecting the critical path for completion of [...]. SCE currently expects [...] will not be delivered until after [...] commitment date, more than 3 months later than originally scheduled.

As described in Enclosure 2 Attachment 1, SCE developed the updated high confidence schedule for completing this work shown in Enclosure 2 Attachment 3, based on the updated recovery schedule in Enclosure 2 Attachment 2, plus margins to allow for uncertainty in the scope and schedule of the remaining work. Based on the updated recovery schedule, SCE expects to complete installation and testing [...]. With margins to account for the uncertainties in the scope and schedule of the remaining work, SCE has high confidence that the work will be completed by [...].

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

ENCLOSURE 2

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

ENCLOSURE 2

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

Attachment 1 – Summary of Critical Path Activities, Impacts and Risks

Attachment 2 – Updated Recovery Schedule

Attachment 3 – Updated High Confidence Schedule

ENCLOSURE 2

Attachment 1

Summary of Critical Path Activities, Impacts and Risks

ENCLOSURE 2
Attachment 1

Summary of Critical Path Activities, Impacts and Risks

Reference: (A) SCE (R. J. St. Onge) letter to NRC dated August 24, 2010,
Subject: Request for Exemption from Physical Security
Requirements, San Onofre Nuclear Generation Station,
Units 2 and 3

1. Critical Path Activities

As discussed in Enclosure 1, compliance with 10 CFR 73.55 will be achieved when [...]. The critical path activities, with reference to the Enclosure 2 Attachment 2 schedule (starting on page 4 of 6), are as follows:

Delivery of new [...]

Edison pre-operational testing and vendor site acceptance testing [...]. The [...] changes are considered complete when this activity has been completed.

2. Critical Path Schedule Impacts

The critical path schedule for completion of [...] has been impacted as follows:

2.1. Delays in completing submittal, review and approval of the [...] vendor documents resulted in a 4 week delay in the scheduled delivery date [...].

2.2. Problems identified during initial factory acceptance testing resulted in an additional 6 week delay in the scheduled delivery date [...].

2.3. Problems identified during the second factory acceptance test [...], resulted in an additional 4 week delay in the delivery date [...].

2.4. Updated recovery schedule

The updated recovery schedule, accounting for the critical path schedule impacts identified above, is provided as Enclosure 2 Attachment 2. This schedule represents the earliest dates that the required activities could be completed [...].

3. Critical Path Schedule Risks

There are significant uncertainties in the schedule for the [...] changes, including the following:

3.1. Resolution of factory acceptance test issues for [...] is still ongoing. The second factory acceptance test [...] could not be completed due to new problems in functions that had previously tested satisfactorily. After two failed factory acceptance tests and a resulting delay of 10 weeks, SCE's confidence in

ENCLOSURE 2

Attachment 1

the ability of the vendor to resolve these problems within the current schedule has been significantly reduced.

- 3.2. The [...] design has been based on component specifications [...] vs. actual [...]. If the actual [...] is more than design, a large number of [...] may need to be added to the design and installed.
- 3.3. Any integration problems between plant systems and the new equipment [...] can only be identified and resolved after the new equipment is connected to plant systems and testing begins.
- 3.4. Rework and emergent material needs have the potential to impact the schedule.
- 3.5. Emergent plant issues could impact the availability of qualified resources and movement of delivered material and equipment into the SONGS Protected Area.
- 3.6. High Confidence Schedule

The high confidence schedule milestones, accounting for the critical path schedule risks identified above, are provided as Enclosure 2 Attachment 3. The high confidence schedule includes [...] margin to account for the schedule risks, completing on [...]

ENCLOSURE 2

Attachment 2

Updated Recovery Schedule

ENCLOSURE 2
Attachment 2

[...]

ENCLOSURE 2

Attachment 3

Updated High Confidence Schedule

ENCLOSURE 2
Attachment 3

[...]