

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. Note that Enclosure 1 to this letter contains Safeguards Information.

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 requests that Enclosure 2, which contains Security Related Information, be withheld from public disclosure in accordance with 10 CFR 2.390.

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 version of this letter edited for public disclosure was signed and submitted to the NRC on this date.

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

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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

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