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Richard J. St. Onge
Director
Nuclear Regulatory Affairs

November 23, 2010

Mr. Elmo 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, 50-362**
Response to the U.S. Nuclear Regulatory Commission (NRC) Midcycle Performance Review Letter for the San Onofre Nuclear Generating Station (SONGS)– Notification of Readiness for Inspection of Certain Safety Culture Themes

References:
(1) NRC Letter, dated September 1, 2010, Mid-Cycle Performance Review and Inspection Plan — SONGS, from E.E. Collins, Regional Administrator, NRC Region IV, to R.T. Ridenoure, Chief Nuclear Officer of SCE

(2) SCE Letter, dated October 12, 2010, Response to the NRC Mid-Cycle Performance Review and Inspection Plan — SONGS, from J. J. Sheppard, Chief Nuclear Officer of SCE, to E.E. Collins, Regional Administrator, NRC Region IV.

Dear Mr. Collins:

The NRC's letter to Southern California Edison (SCE) dated September 1, 2010, (Reference 1) requested that SCE notify the NRC when the San Onofre Nuclear Generating Station (SONGS) is ready for the NRC to assess the effectiveness of our actions to address identified safety-culture themes.

SCE has reviewed the effectiveness of our improvement efforts detailed in SCE's response to the NRC Midcycle Performance Review letter (Reference 2), and considers the following safety-culture themes ready for NRC inspection:

- For the Substantive Cross Cutting Issue (SCCI) in the area of Problem Identification and Resolution, in the safety culture component of the Corrective Action Program, the themes of:
  - P.1(a) - Implementing CAP with a low threshold for identifying issues,
  - P.1(c) - Thoroughly evaluating problems such that the resolutions address causes and extent of condition, and
  - P.1(d) - Taking appropriate corrective actions to address safety issues in a timely manner, commensurate with their safety significance.

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- For the Substantive Cross Cutting Issue in the area of Human Performance, in the safety culture component of Resources, the themes of:
  - H.4(a) - Communication of human error prevention techniques
  - H.4(c) - Supervisory and management oversight of work activities, including contractors, supports nuclear safety.

SCE also reviewed our readiness for inspection of H.2(c), "Complete, accurate and up-to-date design documentation, procedures, and work packages, and correct labeling of components." While SONGS has made progress in addressing the individual elements within this theme, we concluded that additional work is required to improve written instruction quality prior to requesting the NRC to inspect H.2(c). SCE has reviewed progress in the other HU cross-cutting themes and is not requesting NRC inspection at this time.

If you have any questions, please contact me or Mr. C. E. Williams at (949) 368-6707.

Sincerely,

cc: NRC Document Control Desk
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3
R. Hall, NRC Project Manager, San Onofre Units 2 and 3