

March 25, 2011

10 CFR 50.4

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

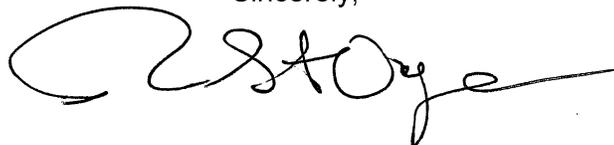
Subject: **Docket Nos. 50-361, 50-362, and 72-41**  
**Summary Report of Commitment Changes Implemented During the Period**  
**From December 19, 2008, Through March 17, 2011**  
**San Onofre Nuclear Generating Station (SONGS) Units 2 and 3,**  
**and the Independent Spent Fuel Storage Installation**

Dear Sir or Madam:

Pursuant to the guidance in Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0, attached is a summary of commitments changed during the period from December 19, 2008, through March 17, 2011. These commitment changes were evaluated by SONGS as not requiring prior NRC approval. This letter provides NRC notification of these changes. Attachment 1 includes a summary of commitment changes and a basis for each change. In addition, Attachment 2 provides a summary of changes to several proposed actions described in previous correspondence to the NRC related to human performance and safety culture issues. Although not considered formal regulatory commitments, SONGS has included these changes for your information.

This letter does not contain any new commitments. If you have any questions or would like any additional information, please contact Mr. Ryan I. Treadway at (949) 368-9985.

Sincerely,



Attachments: As stated

cc: E. E. Collins, Regional Administrator, NRC Region IV  
R. Hall, NRC Project Manager, SONGS Units 2 and 3  
G. G. Warnick, NRC Senior Resident Inspector, SONGS Units 2 and 3

<b>ATTACHMENT 1- SUMMARY REPORT OF COMMITMENT CHANGES IMPLEMENTED DURING THE PERIOD FROM DECEMBER 19, 2008 THROUGH MARCH 17, 2011</b>			
SONGS Tracking No.	Source	Commitment Description	Change Summary and Basis for Change
NN 201191021	SCE letter to NRC, dated August 16, 2010, License Amendment Requests 259 and 245, One-Time Technical Specification (TS) Changes to TS 3.8.1, "AC Sources-Operating"	The amendment proposed in the August 16, 2010, letter requested a one-time revision of Technical Specification (TS) 3.8.1 Condition A completion time. The change would extend the time allowed to perform preventive maintenance on all of the 4160-volt breaker cubicles on one train at the same time from 72 hours to 10 days. The amendment request included the commitment to not allow any switchyard work during the once-per-train 10-day completion time for one offsite power source inoperable. On October 15, 2010, the NRC approved the proposed changes subject to the restrictions incorporated into the amended TS 3.8.1, and the commitments made in the August 16, 2010, amendment request.	<p>The commitment was revised on November 19, 2010, to allow switchyard restricted access to be established during the once-per-train 10-day completion time for one offsite power source inoperable. This change permits response to events in the switchyard which may result in escalation of a loss of AC power event. This change does not change the intent of the commitment, which is to prevent electrical disturbances in the switchyard during the period in which the offsite power sources have reduced redundancy.</p> <p>The commitment change was determined necessary following a plant condition on November 5, 2010, that required entry into the switchyard while Unit 2 was at approximately 100% power with Train A in the TS 3.8.1 10-day outage and Unit 3 in a refueling outage. Entry into the switchyard was required to manually open line and bus disconnects for the breaker in order to prevent arcing/flashing that could have resulted in a larger fault in the AC power system.</p>

ATTACHMENT 2 - SUMMARY OF CHANGES TO PROPOSED ACTIONS DESCRIBED IN PREVIOUS CORRESPONDENCE TO NRC IMPLEMENTED DURING THE PERIOD FROM DECEMBER 19, 2008 THROUGH MARCH 17, 2011			
SONGS Tracking No.	Source	Proposed Action	Change Summary and Basis for Change
SIBP 5.23.1.D	SCE letter to NRC, dated October 12, 2010, Response to the NRC Letter Regarding Midcycle Performance Review and Inspection Plan	<p>The following action was stated in the October 12, 2010, letter to the NRC.</p> <p>“Corrective Action to Improve Change Management to Cause Evaluation Interface by implementing the following: Strengthen procedure SO123-XV-50.CAP-3 (Corrective Action Program Evaluations and Action Plans) to require that formal Change Management is applied for all RCE related Corrective Actions (not just CAPRs) to address potential resource, priority and cost challenges throughout the Station. The Change Management plan should be issued within 15-calendar days after CARB approval of a RCE and submitted to CARB for review. The responsibility to develop and submit the plan rest with the RCE management sponsor and RCE team lead using the resources of the RCE team members as appropriate.”</p>	<p>The wording of this statement was modified to more clearly reflect the intended action and to align with the approved procedure revision. This change is clearly editorial and does not change the intent of the proposed action. The modified action is as follows.</p> <p>“Revise procedure S0123-XV-50.CAP-3 (Corrective Action Program Evaluations and Action Plans) to state: Issue an approved Change Management Plan in accordance with procedure SO123-XV-50.7 within 15 calendar days, after CARB approval of the RCE and submitted to CARB for review, that address potential resources, priority, and cost challenges throughout the station and includes, as appropriate, a training needs analysis.”</p>
SIBP 4.23.1.K SIBP 4.24.1.E	SCE letter to NRC, dated October 12, 2010, Response to the NRC Letter Regarding Midcycle Performance Review and Inspection Plan	<p>The following action was stated in the October 12, 2010, letter to the NRC, with a due date of December 15, 2010.</p> <p>"Revise SO123-XV-HU-1, Human Performance Program, to develop and implement Divisional Management Review Meetings (D-MRMs). The purpose of a D-MRM is to challenge HU behaviors and focus on improvements, trends, and safety performance.”</p>	<p>The wording of this statement was modified to delete the specific procedure number. The appropriate procedures will be revised as necessary to address and/or implement the D-MRMs. This change is editorial and does not change the intent of the proposed action. The modified action is as follows.</p> <p>"Develop and implement Divisional Management Review Meetings (D-MRMs). The purpose of a D-MRM is to challenge HU behaviors and focus on improvements, trends, and safety performance.”</p> <p>In addition, the due date for this action is extended to April 30, 2011, to allow coordination with a subsequent Root Cause Evaluation and alignment with related Corrective Actions to Prevent Recurrence (CAPRs).</p>

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SIBP 1.4.1.Q	<p>SCE letter to NRC, dated October 29, 2009, Independent Safety Culture Assessment Results and Action Plans (Response to NRC Mid-Cycle Performance Review Letter)</p> <p>SCE letter to NRC, dated March 31, 2010, Response to NRC to NRC Mid-Cycle Performance Review Letter - Modifications to Submittals</p>	<p>The following action was stated in the October 29, 2009, letter to the NRC.</p> <p>"Perform a review and revision (or replacement) of top level SONGS site governance documents that define roles, responsibilities and functions of key departments and programs."</p> <p>This action resulted from the Independent Safety Culture Evaluation and the Synergy Survey performed at SONGS in 2009.</p> <p>The original due date for this action was changed from September 30, 2010 to July 31, 2011, in SCE letter to NRC, dated March 31, 2010.</p>	<p>This specific action is cancelled because it has been addressed by other completed actions. These actions include:</p> <ul style="list-style-type: none"> <li>• A standards document was developed describing fundamental accountabilities of site organizations. This document addresses nuclear safety culture, compliance with requirements and procedures, timely completion of activities, and Safety Conscious Work Environment. (SIBP 1.4.1.A)</li> <li>• An overall accountability document was developed that includes the SONGS Leadership model and roles, responsibility and functions for key site programs and divisions, for use in leadership alignment including the Leadership Academy. (SIBP 1.4.1.B)</li> <li>• Implementation of the SONGS Leadership Academy to reinforce the SONGS Leadership Model and the SONGS Excellence strategy. (SIBP 1.4.1.D)</li> <li>• Conducting a leadership seminar for station managers and supervisors in the manager/supervisor development program to gain understanding and alignment around the Leadership Model and alignment and standards document. (SIBP 1.4.1.C)</li> </ul>

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SIBP 1.4.1.R	SCE letter to NRC, dated October 29, 2009, Independent Safety Culture Assessment Results and Action Plans (Response to NRC Mid-Cycle Performance Review Letter)	<p>The following action was stated in the October 29, 2009, letter to the NRC.</p> <p>"Perform process mapping for key site functions such as corrective action, oversight, operability determinations, and work management to ensure clear understanding of how each works, ensure alignment between processes, and ensure clarity for interfaces and that appropriate procedural, organizational, and oversight support is in place."</p>	<p>This specific action is cancelled because it has been addressed by other completed actions. These actions include:</p> <ul style="list-style-type: none"> <li>• A standards document was developed describing fundamental accountabilities of site organizations. This document addresses nuclear safety culture, compliance with requirements and procedures, timely completion of activities, and Safety Conscious Work Environment. (SIBP 1.4.1.A)</li> <li>• An overall accountability document was developed that includes the SONGS Leadership model and roles, responsibility and functions for key site programs and divisions, for use in leadership alignment including the Leadership Academy. (SIBP 1.4.1.B)</li> <li>• Implementation of the SONGS Leadership Academy to reinforce the SONGS Leadership Model and the SONGS Excellence strategy. (SIBP 1.4.1.D)</li> <li>• Conducting a leadership seminar for station managers and supervisors in the manager/supervisor development program to gain understanding and alignment around the Leadership Model and alignment and standards document. (SIBP 1.4.1.C)</li> </ul>

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<b>SONGS Tracking No.</b>	<b>Source</b>	<b>Proposed Action</b>	<b>Change Summary and Basis for Change</b>
SIBP 5.5.1.A	<p>SCE letter to NRC, dated April 21, 2009, Response to Annual Assessment Letter</p> <p>SCE letter to NRC, dated October 30, 2009, Response to NRC Mid-Cycle Performance Review Letter</p> <p>SCE letter to NRC, dated March 31, 2010, Response to NRC to NRC Mid-Cycle Performance Review Letter - Modifications to Submittals</p>	<p>The original proposed action was stated in the April 21 and October 30, 2009, letters to NRC. Subsequently, the action statement was modified and the due date was changed from December 31, 2009 to December 31, 2010, in SCE letter to NRC, dated March 31, 2010.</p> <p>The action, as modified, is as follows:</p> <p>“As an interim action, the station is using external personnel with cause evaluation experience, including experience with evaluation of extent of cause and extent of condition, to coach station personnel in achieving industry levels of cause evaluation timeliness and quality. This action will close when station performance is satisfactory and sustainable per metrics established for timeliness and quality. The metrics will monitor the station’s ability to perform evaluations within 35 days, and achieve quality using cause evaluation grading criteria with independent review.”</p>	<p>The due date is extended to May 8, 2011, to allow additional time to meet the action closure criteria; i.e., this action will close when station performance is satisfactory and sustainable per metrics established for timeliness and quality.</p> <p>The action statement, as modified by the SCE letter to NRC, dated March 31, 2010, is unchanged.</p>
SIBP 1.1.1.R	<p>SCE letter to NRC, dated October 29, 2009, Independent Safety Culture Assessment Results and Action Plans (Response to NRC Mid-Cycle Performance Review Letter)</p>	<p>The following action was stated in the October 29, 2009, letter to the NRC, with a due date of April 30, 2011.</p> <p>“Conduct a follow-up, site-wide independent safety culture assessment to determine progress in addressing the issues identified in the 2009 independent safety culture assessment.”</p>	<p>The due date is extended to July 30, 2011, to allow coordination with the current schedule for the 2011 Integrated Safety Culture Survey and Assessment.</p>