

April 22, 2011

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

Subject: **Docket Nos. 50-361 and 50-362**  
**Request for Extension of Enforcement Discretion**  
**San Onofre Nuclear Generating Station (SONGS), Units 2 and 3**

- References:
1. Enforcement Guidance Memorandum (EGM) 09-001  
Dated January 30, 2009, Subject: Dispositions Violations of NRC  
Requirements for Operability of Gaseous Monitors for Reactor Coolant  
System Leakage Detection
  2. January 3, 2011 Federal Register, Vol. 76, No.1, Nuclear Regulatory  
Commission, Notice of Availability of Models for Plant-Specific  
Adoption of Technical Specifications Task Force Traveler TSTF-513,  
Revision 3, "Revise PWR Operability Requirements and Actions for  
RCS Leakage Instrumentations" [NRC-2009-0444]

Dear Sir or Madam:

By Enforcement Guidance Memorandum (EGM) 09-001 dated January 30, 2009 (Reference 1), the NRC granted enforcement discretion from requirements for operability of gaseous monitors for Reactor Coolant System leakage detection. The EGM stated that in order to continue receiving this enforcement discretion, affected licensees shall submit a License Amendment Request (LAR) within four months after the issuance of a Notice of Availability (NOA) of model License Amendment Requests, safety evaluations, and no-significant-hazards consideration determinations. The NRC would consider extending the four month period, on a case-by-case basis, with adequate justification from the licensee.

The NOA for Technical Specifications Task Force (TSTF)-513 was published on January 3, 2011 (Reference 2), effectively requiring affected licensees to submit an LAR by May 3, 2011 in order to maintain enforcement discretion.

Southern California Edison (SCE) is currently completing a TS Conversion, which includes the adoption of multiple TSTFs. SCE intends to include adoption of TSTF-513 in the TS Conversion which will allow for a more efficient review process, resulting in a resources savings to both the NRC and SCE.

ADD  
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SCE intends to submit the TS Conversion shortly, but will not meet the May 3, 2011 date for submittal. SCE requests that enforcement discretion be extended three (3) months to August 3, 2011.

This letter contains no new commitments nor revises any previous commitments.

If you have any questions regarding this request, please contact Ms. Linda T. Conklin at 949-368-9443.

Sincerely,

A handwritten signature in black ink, appearing to read "R. P. Zimmerman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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