

10 CFR 50.48(c)

June 24, 2011

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

**Subject: Docket Nos. 50-361 and 50-362
Request for Extension of Enforcement Discretion and Commitment to
Submittal Date for 10 CFR 50.48(c) License Amendment Request
San Onofre Nuclear Generating Station Units 2 and 3**

References:

1. SECY-11-0061, A Request to Revise the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(c) to Allow Licensees to Submit License Amendment Requests in a Staggered Approach (RIN 3150-AG48), dated April 29, 2011
2. Staff Requirements Memorandum (SRM) SECY-11-0061, A Request to Revise the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(c) to Allow Licensees to Submit License Amendment Requests in a Staggered Approach (RIN 3150-AG48), dated June 10, 2011
3. Letter from P. Dietrich (SCE) to Document Control Desk (NRC), dated December 20, 2010, Subject: Docket Nos. 50-361 and 50-362, Request for Extension of Enforcement Discretion and Revised Submittal Date for 10 CFR 50.48(c) License Amendment Request, San Onofre Nuclear Generating Station, Units 2 and 3 (ML103550491)
4. Letter from J. G. Giitter (NRC) to P. Dietrich (SCE), dated March 14, 2011, Subject: San Onofre Nuclear Generating Station, Units 2 and 3 – Request for an Extension of the Fire Protection Enforcement Discretion (TAC Nos. ME5339 and ME5340) (ML110630175)

Dear Sir or Madam:

In accordance with Reference 1, and as approved by the Commission per Reference 2, Southern California Edison (SCE) commits to submit the License Amendment Request (LAR) implementing 10 CFR 50.48(c) for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 on March 31, 2013.

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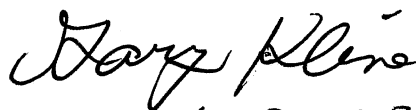
This is a change to the schedule submitted in Reference 3 with approval granted in Reference 4. This letter contains one new commitment for the LAR submittal date and no revisions to existing commitments.

As presented to the NRC during a public meeting on April 7, 2011 (ML110970641), SCE has performed a Fire Probabilistic Risk Assessment (PRA) and conducted an industry peer review. SCE has also performed an initial fire risk evaluation for each fire area with variances from the deterministic requirements. During the LAR extension period, SCE plans to make Fire PRA refinements to finalize fire risk evaluations and the identification of any risk-reducing plant changes. The LAR submittal will include completed and planned plant changes with an implementation schedule.

In addition, SCE requests that the enforcement discretion be extended to correspond to the LAR submittal commitment date. Per the enforcement discretion policy, once the LAR is submitted, the enforcement discretion would then continue until the NRC dispositions the LAR to transition to NFPA 805, consistent with Reference 1.

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

Sincerely,


for DOUG BAUDER

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