



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

September 1, 2011

Peter Dietrich
Senior Vice President and
Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN –
SAN ONOFRE NUCLEAR GENERATING STATION - UNITS 2 AND 3

Dear Mr. Dietrich:

On August 17, 2011, the NRC completed its mid-cycle performance review of San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2010 through June 30, 2011. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. This performance review and enclosed inspection plan do not include security information. A separate letter will include the NRC's assessment of your performance in the Security Cornerstone and its security-related inspection plan.

Overall, San Onofre Nuclear Generating Station, Units 2 and 3, operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance at SONGS Units 2 and 3 during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

In our 2010 Annual Assessment Letter, dated March 4, 2011, we advised you of a continuing substantive cross-cutting issue (SCCI) supported by five themes in the area of Human Performance. These themes are associated with three safety culture components: (1) Decision-Making involving the theme of using conservative assumptions [H.1 (b)]; (2) Resources involving the theme of providing adequate design documentation, procedures, and work instructions [H.2(c)]; and (3) Work Practices involving the themes of using human error prevention techniques [H.4(a)], communicating expectations regarding procedural compliance [H.4(b)], and ensuring supervision and management of work activities [H.4(c)]. By letter dated April 28, 2011 (ML1112200610), Mr. Richard St. Onge, Director, Nuclear Regulatory Affairs, advised us that you were ready for inspection of your actions to address these human performance themes. The NRC conducted a focused Problem Identification and Resolution

inspection in June, 2011, documented in NRC inspection report 05000361;362/2011007 (ML112130381). Based on the results of that inspection, and a significant reduction in the number of findings with aspects in human performance, NRC determined that your corrective actions had resulted in sustained and measurable performance in 4 of the 5 open themes; [H.2(c), H.4(b), H.4(c), and H.4(a)], and closed these 4 themes.

The NRC determined that your corrective actions associated with the theme of conservative assumptions in decision-making [H.1(b)] had not resulted in sustained and measurable performance improvement based on the recent and continuing high number of findings (5) with that aspect. Therefore, the NRC concluded that the SCCI in human performance continued and requires additional attention from you to address. This is the eighth consecutive assessment cycle with a SCCI in human performance. We understand that your staff has initiated a common cause evaluation to assess the continuing issues related to this theme. When you have determined that your corrective actions have resulted in sustained and measurable performance improvement, you should notify us in writing of your readiness for inspection in this area.

The NRC issued a Chilling Effect Letter to Southern California Edison (SCE) on March 2, 2010. This letter was issued in response to numerous observations including employees expressing difficulty or inability to use the corrective action program, a lack of knowledge or mistrust of the Nuclear Safety Concerns Program (NSCP), a substantiated case of a supervisor creating a chilled work environment in his/her work group, a perceived fear of retaliation for raising safety concerns, and a very high number of allegations related to SONGS safety conscious work environment (SCWE). Based on direct inspection, allegation trend data, SCWE metrics, and survey results, the NRC has determined that you have made reasonable progress in addressing SCWE issues at SONGS during 2010 and 2011. Additionally, you have put in place new programs and processes to continue to improve the SCWE of the facility and to monitor progress in this area. Therefore, the NRC is not opening a SCCI in SCWE. The NRC will continue to monitor your activities to address SCWE through the baseline inspection program to verify the effectiveness and sustainability of your efforts in this area.

In the days following the Fukushima Dai-ichi nuclear accident in Japan, the Commission directed the staff to establish a senior-level agency task force to conduct a methodical and systematic review of the NRC's processes and regulations to determine whether the agency should make additional improvements to its regulatory system. The NRC has since completed Temporary Instruction (TI) 183, "Follow-up to Fukushima Dai-ichi Nuclear Station Fuel Damage Event," and TI-184, "Availability and Readiness Inspection of Severe Accident Management Guidelines (SAMGs)" at your facility. Results of these inspections can be found here: <http://www.nrc.gov/japan/japan-activities.html>. Additionally, on May 11, 2011, the agency issued NRC Bulletin 2011-01, "Mitigating Strategies," to confirm compliance with Order EA-02-026, subsequently imposed license conditions, and 10 CFR 50.54(hh)(2), and to determine the status of licensee mitigating strategies programs. On July 12, 2011, the NRC's Task Force made its recommendations to the Commission in its report, "Recommendations for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident." The Commission is currently reviewing the Task Force's recommendations to determine whether additional actions may be warranted.

The enclosed inspection plan lists the inspections scheduled through December 31, 2012. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to

allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 817-860-8173 with any questions you have regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan E. Lantz", with a long horizontal flourish extending to the right.

Ryan E. Lantz
Reactor Projects Branch D
Division of Reactor Projects

Docket Nos.: 50-361, 50-362
License Nos.: NPF-10, NPF-15

Enclosure:
San Onofre Nuclear Generating Station Inspection Plan

Distribution: listserv

San Onofre
Inspection / Activity Plan
09/01/2011 - 12/31/2012

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Unit Number	Planned Dates Start	Planned Dates End	Inspection Activity	Title	No. of Staff on Site
2	09/12/2011	09/16/2011	EXAM - INITIAL OPERATOR EXAM X02476	INITIAL EXAM - UNIT 2 - SONGS (10/2011)	5
3	09/12/2011	09/16/2011	X02477	INITIAL EXAM - UNIT 3 - SONGS (10/2011)	
2	10/31/2011	11/10/2011	X02476	INITIAL EXAM - UNIT 2 - SONGS (10/2011)	
3	10/31/2011	11/10/2011	X02477	INITIAL EXAM - UNIT 3 - SONGS (10/2011)	
2, 3	10/24/2011	10/28/2011	RP123 - RADIATION SAFETY IP 71124.01	Radiological Hazard Assessment and Exposure Controls	2
2, 3	10/24/2011	10/28/2011	IP 71124.02	Occupational ALARA Planning and Controls	
2, 3	10/24/2011	10/28/2011	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
2, 3	10/24/2011	10/28/2011	IP 71151-OR01	Occupational Exposure Control Effectiveness	
2, 3	10/24/2011	10/28/2011	IP 71151-PR01	RETS/ODCM Radiological Effluent	
2	01/09/2012	01/20/2012	PSB2-08P - INSERVICE INSPECTION - U2 IP 7111108P	Inservice Inspection Activities - PWR	2
2, 3	03/19/2012	03/23/2012	EP-1 - BIENNIAL EP PROGRAM INSPECTION IP 7111402	Alert and Notification System Testing	1
2, 3	03/19/2012	03/23/2012	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
2, 3	03/19/2012	03/23/2012	IP 7111404	Emergency Action Level and Emergency Plan Changes	
2, 3	03/19/2012	03/23/2012	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
2, 3	03/19/2012	03/23/2012	IP 71151-EP01	Drill/Exercise Performance	
2, 3	03/19/2012	03/23/2012	IP 71151-EP02	ERO Drill Participation	
2, 3	03/19/2012	03/23/2012	IP 71151-EP03	Alert & Notification System	
2, 3	03/25/2012	03/29/2012	TSB-52B - BIENNIAL PI&R INSPECTION IP 71152B	Problem Identification and Resolution	4
2, 3	04/11/2012	04/15/2012	IP 71152B	Problem Identification and Resolution	
2, 3	05/21/2012	05/25/2012	EB1-07T - HEAT SINK PERFORMANCE IP 7111107T	Heat Sink Performance	1
2, 3	06/18/2012	06/30/2012	EB1-17T - 50.59 & PERM PLANT MODS IP 7111117T	Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	2
2, 3	06/18/2012	06/30/2012	IP 7111117T-chng/tst	change/test/evaluations	
2, 3	06/18/2012	06/30/2012	IP 7111117T-evals	evaluations	
2, 3	06/18/2012	06/30/2012	IP 7111117T-permod	permanent mods	
2, 3	07/23/2012	07/27/2012	RS5678 - RADIATION SAFETY TEAM INSPECTION IP 71124.05	Radiation Monitoring Instrumentation	4
2, 3	07/23/2012	07/27/2012	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

Unit Number	Planned Dates Start	Planned Dates End	Inspection Activity	Title	No. of Staff on Site
			RS5678	- RADIATION SAFETY TEAM INSPECTION	4
2,3	07/23/2012	07/27/2012	IP 71124.07	Radiological Environmental Monitoring Program	
2,3	07/23/2012	07/27/2012	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
			BRQ INSP	- BRQ INSPECTION	2
2,3	07/30/2012	08/03/2012	IP 7111111B	Licensed Operator Requalification Program	4
			EXAM	- INITIAL OPERATOR EXAM	
2	09/10/2012	09/14/2012	X02494	INITIAL EXAM UNIT 2- SONGS (01/01/2012)	
3	09/10/2012	09/14/2012	X02495	INITIAL EXAM FOR SONGS, UNIT 3, START DATE (01/01/2012)	
2	10/15/2012	10/19/2012	X02494	INITIAL EXAM UNIT 2- SONGS (01/01/2012)	
3	10/15/2012	10/19/2012	X02495	INITIAL EXAM FOR SONGS, UNIT 3, START DATE (01/01/2012)	
			RS12	- RADIATION SAFETY	2
2,3	11/05/2012	11/09/2012	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
2,3	11/05/2012	11/09/2012	IP 71124.02	Occupational ALARA Planning and Controls	
2	11/05/2012	11/09/2012	IP 71151-OR01	Occupational Exposure Control Effectiveness	
2	11/05/2012	11/09/2012	IP 71151-PR01	RETS/ODCM Radiological Effluent	

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