

November 24, 2010

MEMORANDUM TO: Geoff Miller
Acting Regional Coordinator, RIV
Office of Executive Director for Operations

FROM: Michael T. Markley, Chief /RA/
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: G20100700/EDATS: OEDO-2010-0958 - BRIEFING PACKAGE FOR
DROP-IN VISIT ON DECEMBER 1, 2010, BY EXECUTIVES OF
SOUTHERN CALIFORNIA EDISON COMPANY WITH CHAIRMAN
JACZKO AND COMMISSIONERS SVINICKI, APOSTOLAKIS, AND
OSTENDORFF, THE DEPUTY EXECUTIVE DIRECTOR FOR
REACTOR AND PREPAREDNESS PROGRAMS, THE DIRECTORS,
OFFICES OF NUCLEAR REACTOR REGULATION AND NUCLEAR
SECURITY AND INCIDENT RESPONSE, AND THE AGENCY
ALLEGATIONS ADVISOR (TAC NOS. ME5057 AND ME5058)

Enclosed is the briefing package in support of the drop-in visit by Mr. Peter T. Dietrich, Senior Vice President and Chief Nuclear Officer, Southern California Edison Company (SCE), and Mr. Richard J. St. Onge, Director, Nuclear Regulatory Affairs, SCE. The SCE representatives will meet with Chairman Gregory B. Jaczko and Commissioners Kristine L. Svinicki, George E. Apostolakis and William C. Ostendorff, the Deputy Executive Director for Reactor and Preparedness Programs, Martin J. Virgilio, the Director of the Office of Nuclear Reactor Regulation, Eric J. Leeds, the Director of the Office of Nuclear Security and Incident Response, James T. Wiggins, and the Agency Allegations Advisor, Lisamarie Jarriel, regarding San Onofre Nuclear Generating Station, Units 2 and 3.

If you need any additional information, please contact Randy Hall at 301-415-4032 or by e-mail at randy.hall@nrc.gov.

Docket Nos. 50-361 and 50-362

Enclosure:
Briefing Package

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E. Leeds, NRR
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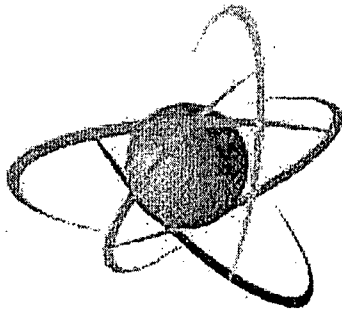
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U.S. NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

SOUTHERN CALIFORNIA EDISON COMPANY

**SAN ONOFRE NUCLEAR GENERATING
STATION, UNITS 2 AND 3**

DROP-IN VISIT

DECEMBER 1, 2010

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Drop-In Visit Agenda

December 1, 2010

ITINERARY

TIME	PERSON VISITED	CONTACT PERSON	EXTENSION
9:30 a.m. - 10:00 a.m.	Commissioner Kristine L. Svinicki	Janet Lepre	301-415-1855
10:15 a.m. - 10:45 a.m.	Commissioner William C. Ostendorff	Linda Herr	301-415-1759
11:00 a.m. - 11:30 a.m.	Martin J. Virgilio, Deputy Executive Director for Reactor and Preparedness Programs and Eric J. Leeds, Director of the Office of Nuclear Reactor Regulation	Renee Taylor	301-415-1700
12:30 p.m. - 1:00 p.m.	Lisamarie Jarriel, Agency Allegations Advisor	L. Jarriel	301-415-8529
1:00 p.m. - 2:00 p.m.	Chairman Gregory B. Jaczko	Patti Pace	301-415-1820
2:00 p.m. - 2:30 p.m.	James T. Wiggins, Director of the Office of Nuclear Security and Incident Response	Amy Salus	301-415-7476
3:00 p.m. - 3:30 p.m.	Commissioner George E. Apostolakis	Kathleen Blake	301-415-1810

**VISITORS REPRESENTING
SOUTHERN CALIFORNIA EDISON COMPANY (SCE)
San Onofre Nuclear Generating Station, Units 2 and 3**

- Peter T. Dietrich, Senior Vice President and Chief Nuclear Officer, SCE
- Richard J. St. Onge, Director, Nuclear Regulatory Affairs, SCE

TOPICS OF DISCUSSION

- Introduction of New Senior Vice President and Chief Nuclear Officer

Facility Data

San Onofre Nuclear Generating Station

Utility: Southern California Edison (SCE)*
 Location: 4 miles southeast of San Clemente, California
 County: San Diego County, California

	<u>Unit 1**</u>	<u>Unit 2</u>	<u>Unit 3</u>
Docket Nos.	50-206	50-361	50-362
License Nos.	DPR-13	NPF-10	NPF-15
Construction Permit	1963	10/18/1973	10/18/1973
Full Power License	03/27/1967	09/07/1982	09/16/1983
Commercial Operation	01/01/1968	08/08/1983	04/01/1984
Expiration Date	11/30/1992**	02/16/2022	11/15/2022

<u>Plant Characteristics</u>	<u>Units 2 and 3</u>
Reactor Type:	CE 2-loop
Containment Type:	Large Dry
Thermal Power Limit:	3438 MWt (1070/1080 MWe)
Architect/Engineer:	Bechtel
NSSS Vendor:	Combustion Engineering
Turbine Generator:	English Electric
Condenser Cooling Method:	Once Through
Ultimate Heat Sink for ECCS	Pacific Ocean

* San Onofre Nuclear Generating Station is jointly owned by SCE (78.21%), San Diego Gas & Electric (20%), and the city of Riverside (1.79%). SCE is authorized to act as agent for the other co-owners and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

** Unit 1, a Westinghouse 3-loop pressurized water reactor constructed by Bechtel and rated at 1347 MWt, began commercial operation on January 1, 1968, and permanently ceased operation on November 30, 1992. The unit was initially placed in SAFSTOR until 2000 when active decommissioning (DECON) began. Currently, the Unit 1 site is a storage area for the old Unit 2 and 3 steam generators, the Unit 1 reactor vessel, and the site Independent Spent Fuel Storage Installation.

Reactor Oversight Process (ROP) Information

San Onofre Nuclear Generating Station

The U.S. Nuclear Regulatory Commission (NRC) issued its most recent mid-cycle assessment letter for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, on September 1, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102430568), for the period from July 1, 2009, through June 30, 2010. The NRC staff noted that SONGS Units 2 and 3 operated in a manner that preserved public health and safety and fully met all cornerstone objectives. However, the NRC continues to identify performance problems in the areas of Human Performance (HP) and Problem Identification and Resolution (PI&R). This is the sixth consecutive assessment cycle where substantive cross-cutting issues were identified in both of these cross-cutting areas. Corrective actions taken by the licensee to address these substantive cross-cutting issues have been largely ineffective, as the number of inspection findings with HP cross-cutting issues increased from 23 to 33, and those with PI&R issues increased from 13 to 19, during this mid-cycle assessment period as compared to the 2009 end-of-cycle assessment period.

As a result of the continuing problems in HP and PI&R, the NRC plans to conduct additional inspections, above the baseline inspection program, to evaluate the effectiveness of the licensee's performance improvement efforts in these areas. These inspections are discussed in the NRC Deviation memorandum, approved by the Executive Director for Operations on April 30, 2010, and forwarded to the licensee in a letter dated July 7, 2010 (ADAMS Accession No. ML101880540). In June 2010, NRC conducted a team inspection to evaluate progress in addressing the substantive cross-cutting issues. In October 2010, NRC conducted a team inspection to assess operations and maintenance work practices. In December 2010, NRC will conduct a focused inspection to evaluate potential readiness to close 5 of the 9 open safety culture themes. Region IV has also supplemented the on-site NRC staff with a third resident inspector to support the increased level of oversight for the near-term.

Current HP cross-cutting themes are as follows:

- Failure to provide adequate design documentation, procedures, and work instructions (Resources component)
- Ineffective use of human error prevention techniques (Work practices component)
- Failure to use conservative assumptions (Decision making component)
- Weaknesses in ensuring supervisory and management oversight of work activities (Work practices component)
- Failure to effectively communicate expectations for procedural compliance

Current PI&R cross-cutting themes are as follows:

- Failure to evaluate problems thoroughly such that the resolutions effectively address the causes and extent of conditions (Corrective action program component)
- Weaknesses in implementing the corrective action program with a low threshold for identifying issues (Corrective action program component)

- Weaknesses in taking appropriate corrective actions to address safety issues in a timely manner commensurate with their safety significance (Corrective action program component)

On March 2, 2010 (ADAMS Accession No. ML100601272), the NRC issued SONGS a Chilling Effect Letter. 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 their work group, and a perceived fear of retaliation for raising safety concerns. During 2009 and 2010, the NRC received an elevated number of safety conscious work environment (SCWE) related allegations from SONGS. The Chilling Effect Letter contained a number of actions for SONGS to take to improve its working environment, including: (1) development of a SCWE improvement plan; (2) implementation of a communication plan aimed at Southern California Edison and contract personnel; and (3) participation in a public meeting (held in September 2010) to discuss the licensee's progress and additional planned actions to address the SCWE issues. The effectiveness of these actions will be evaluated through normal resident and regional inspections, and through additional focused team inspections. The next focused inspection is planned for January 2011, and a final evaluation in June 2011.

On January 11, 2008 (ADAMS Accession No. ML080110380), the NRC issued a Confirmatory Order as the result of a successful alternative dispute resolution mediation session related to falsification of firewatch certification sheets. Corrective actions have been taken, and some have been effective. The NRC has performed a follow-up inspection and is determining whether the terms of the Order have been satisfied.

Plant performance for the most recent quarter at SONGS, Unit 2, remained within the Regulatory Response Column (Column 2) of the NRC's Action Matrix, based on one White finding in the Mitigating Systems Cornerstone. Plant performance for the most recent quarter at SONGS, Unit 3, was within the Licensee Response Column (Column 1) of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green).

The colored performance indicators and inspection findings for this station can be viewed at the URLs listed below.

SONGS Unit 2: http://www.nrc.gov/nrr/oversight/assess/sano2/sano2_chart.html

SONGS Unit 3: http://www.nrc.gov/nrr/oversight/assess/sano3/sano3_chart.html

Current Issues

San Onofre Nuclear Generating Station

A. EXPECTED DISCUSSION TOPICS

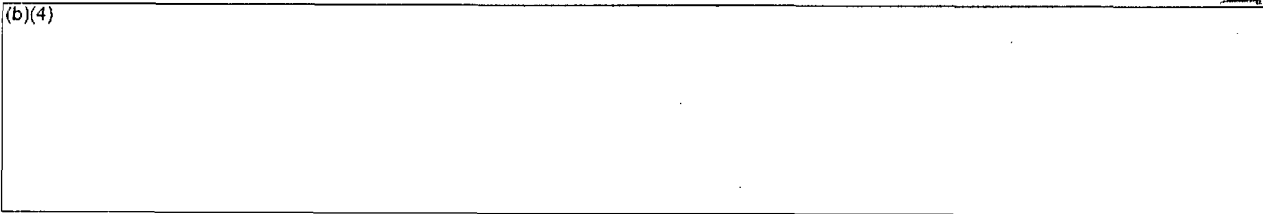
Southern California Edison Company (SCE, the licensee) has requested this visit to introduce the new Senior Vice President and Chief Nuclear Officer, Mr. Peter T. Dietrich (his biographical data is provided in Tab 8). Mr. Dietrich succeeds Mr. James J. (Joe) Sheppard, who held the positions on an interim basis following the resignation of Mr. Ross T. Ridenoure in September 2010. Although the licensee has not provided any additional topics for discussion, the NRC staff has prepared the following overview of recent performance at San Onofre Nuclear Generating Station (SONGS), Units 2 and 3.

Overview of SONGS, Units 2 and 3: Performance History and Current Regulatory Status

On March 3, 2010, the NRC issued its annual assessment letter (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100621410) to SCE for its performance during calendar year 2009 at SONGS Units 2 and 3, and on September 1, 2010, the staff issued its mid-cycle assessment letter (ADAMS Accession No. ML102430568). For the sixth consecutive cycle, the NRC staff has identified substantive cross-cutting issues in the areas of Human Performance (HP) and Problem Identification and Resolution (PI&R), and corrective actions taken by the licensee to address these substantive cross-cutting issues continue to be ineffective. The NRC noted that, while existing performance problems have persisted at the site, new ones have emerged. The number of findings with HP cross-cutting issues increased from 23 to 33, and those with PI&R issues increased from 13 to 19, as compared to the end-of-cycle assessment period.

Throughout 2009 and the first half of 2010, the licensee continued to have performance problems that challenged the operation of both units in the areas of HP and PI&R. Examples of these problems include the isolation of power to the wrong train of the emergency core cooling system (ECCS); a reactor trip caused by the failure to follow heat treat procedures and a poor pre-job briefing, the inoperability of the condensate storage tank due to undetected failure of an associated isolation valve, and inadequate contractor oversight to ensure procedural adherence that resulted in multiple, repeat, small fires during containment tendon-cutting operations. More detailed information on the current ROP assessment for SONGS, Units 2 and 3, is provided in Tab 5.

(b)(4)



E14

Station Recovery Process/Strategy

SCE developed a Site Integrated Improvement Plan (SIIP) in 2008, in part, to address the performance issues identified through NRC inspection findings and in the NRC's Confirmatory

Order dated January 11, 2008. SCE has revised and expanded the SIIP, to adjust for those previous actions that have been ineffective, and to incorporate issues identified recently (e.g., the inclusion of a new Safety Culture Improvement Plan). Overall, the NRC staff remains concerned about the slow progress and ineffectiveness of the licensee's improvement efforts.

Steam Generator Replacement

SCE installed replacement steam generators (RSGs) in Unit 2 during the fall 2009 refueling outage and is currently installing RSGs in Unit 3 during the fall 2010 refueling outage. The steam generator (SG) replacement for both units requires that a large opening (roughly 28' by 28') be cut through the containment structure to allow the passage of the old and new SGs. The Unit 2 SG replacement activities have been completed, and the containment was restored and tested prior to returning the unit to operation. NRC inspectors noted some problems with work control during containment tendon removal, with design control regarding the re-welding of the containment rebar, and with quality control of concrete used in restoration of the containment structure. Similar inspections are being conducted for the Unit 3 SG replacement, currently underway. Lessons learned from the Unit 2 SG replacement appear to have been effective, since the Unit 3 SG replacement outage has been progressing without significant incident. The old SGs have been removed and stored at the Unit 1 facility, and the new SGs are currently being moved into containment for installation.

Safety Conscious Work Environment Update (SCWE)

The NRC issued a Chilling Effect Letter on March 2, 2010 (ADAMS Accession No. ML100601272), as a result of NRC's assessment of the licensee's SCWE. The purpose of the Chilling Effect Letter is to verify that the licensee is taking appropriate actions to ensure that SONGS is a workplace that fosters an environment where employees feel free, and are encouraged, to raise safety concerns. The Chilling Effect Letter requested SCE to take 13 specific actions to respond to the identified SCWE concerns.

In November 2009, the NRC conducted a focused PI&R inspection to evaluate the licensee's progress in addressing the open substantive cross-cutting issues as well as to review the results of the licensee's safety culture survey. During this inspection, the NRC also conducted focus group interviews as an independent check on the licensee's results, which indicated an SCWE concern at SONGS. In February 2010, the NRC conducted additional focus group interviews of approximately 400 licensee and contractor personnel. These interviews confirmed previous NRC inspection observations of SCWE concerns at SONGS. NRC determined that SCWE issues as well as internal communication issues continue to be significant contributors to the failure of SCE to effectively address the long-standing substantive cross-cutting issues.

The NRC concluded that some employees in multiple workgroups at SONGS have the perception that they are not free to raise safety concerns using all available avenues and that management has not been effective in encouraging employees to use all available avenues without fear of retaliation. This conclusion resulted from numerous observations including (1) employees expressing difficulty or inability to use the corrective action program, (2) a lack of knowledge or mistrust of the Nuclear Safety Concerns Program (NSCP), (3) the substantiated case of a supervisor creating a chilled work environment in his/her work group, and (4) a perceived fear of retaliation for raising safety concerns.

Through several inspections and interviews with hundreds of plant employees through focus groups, the NRC staff determined that safety concerns are being raised by SONGS personnel through some communication avenues despite the staff's concerns regarding the chilled work environment. The NRC has not identified any safety issues that were not reported by some available avenue. The NRC determined that some employees do not consider certain avenues available, such as discussing a concern with their immediate supervisor, but would find an alternate avenue to communicate their safety concerns.

Operating Status

Unit 2 is currently operating at 100 percent power. The unit returned to operation on April 8, 2010, following an extended outage. Major outage activities included the replacement of both SGs. The outage, originally scheduled to last approximately 3 months, exceeded 6 months in duration due, in part, to several emergent issues (b)(5)

(b)(5)

Ex 13
Arab 6

Unit 3 is currently defueled in a refueling outage that commenced on October 10, 2010. This outage will include replacement of both SGs, as was done for Unit 2. The start of the Unit 3 outage was delayed by approximately 2 weeks from its original schedule, to provide time to implement actions designed to prevent problems with work planning and execution, design control, and contractor oversight similar to those experienced during the Unit 2 outage.

B. OTHER TOPICS OF INTEREST

Plant Equipment Issues

- Degraded connection between battery and output breaker: A White finding from December 2008 remained open because corrective actions were not fully developed and a lack of assurance that corrective actions would be effective. A follow-up 95001 inspection was performed in November 2010, with two potential minor violations identified.
- Schedule 10 piping integrity issues: Multiple instances of piping degradation identified on refueling water tank to ECCS/charging suction piping in both Units 2 and 3. Inspections focused on adequacy of past corrective actions for identified deficiencies, adequacy of past inspections, ongoing operability evaluations, and corrective actions going forward.

Current Licensing Issues

On November 10, 2010 (ADAMS Accession No. ML102990350), the NRC staff granted SCE a second exemption to certain new security requirements in Title 10 of the *Code of Federal Regulations*, Section 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage," issued by NRC in a final rule dated March 27, 2009 (74 FR 13926). The exemption allowed SCE to further extend the implementation date until February 28, 2011, for one remaining specific requirement. The

second exemption was needed due to delays of more than 3 months by the vendor in the production, acceptance testing, and delivery of the critical security equipment needed to meet the one remaining requirement of the new rule.

SCE plans to submit a license amendment request in early 2011 for a major upgrade to the SONGS technical specifications to better align with the current Combustion Engineering Improved Standard Technical Specifications (NUREG-1432, Revision 3). As part of its transition to the performance-based National Fire Protection Association (NFPA) 805 standard for fire protection programs, SCE also plans to submit a license amendment request in the first half of calendar year 2011.

Management Changes

SCE has made many senior management changes over the past 2 years. In addition to the new appointment of Mr. Dietrich as Senior Vice President and Chief Nuclear Officer (effective December 9, 2010), changes have included the positions of Site Vice President and Station Manager (Doug Bauder); Director, Nuclear Regulatory Affairs (Rich St. Onge); Director, Site Recovery (Jim Madigan); Plant Manager (Tom McCool); Director, Operations (D. Yarborough, effective November 29, 2010); Director, Maintenance and Construction (Ed Hubley); and Director, Work Control (David Spires). Many of the new managers have come from outside of SCE.

License Renewal Activities

SCE has not formally announced its intent to seek renewal of the operating licenses for SONGS, Units 2 and 3. However, SONGS is a participant in the Strategic Teaming and Resource Sharing (STARS) group of utilities, and STARS has notified the NRC staff that several unspecified members intend to submit renewal applications in fiscal year 2013.

Open Investigations

(b)(7)(A)

Open Allegations

There are currently 55 open allegations at SONGS. The NRC has received a significant increase in allegations from onsite sources at SONGS to nearly ten times the annual industry median (4). The major areas where concerns continue to be raised include chilling effect, discrimination, and wrongdoing. These allegations have been received from multiple onsite organizations and many have been submitted anonymously.

Harassment and Intimidation Issues

As discussed in Section A above, the NRC issued a Chilling Effect Letter on March 2, 2010, after a spike in the number of allegations and after the NRC performed an assessment of SCWE issues at SONGS. Three of the open allegations involve claims of termination for raising safety concerns. Thirteen additional allegations concern claims of discrimination.

Congressional Interest

Recent congressional interest in SONGS has centered on plant performance, safety culture, and large number of allegations. There have been frequent calls and e-mails from staff of Senator Barbara Boxer (D-CA) and Representative Ken Calvert (R-CA). The NRC Office of Congressional Affairs anticipates interest in Unit 3's SG replacement project in the fall, as Unit 2's replacement last year raised questions.

State Issues

State and local officials have also expressed interest in activities at SONGS. On February 24, 2010, Region IV staff briefed staff from the California Energy Commission on SONGS performance and safety culture issues. On February 2, 2010, the NRC Senior Resident Inspector made a presentation to the San Clemente City Council on the NRC's regulatory role and its views on SCE's safety performance at SONGS.

2.206 Petitions

None.

Selected News Articles

Several print and online news articles discussed the recent changes in SCE management; the ongoing performance issues at SONGS, including safety culture issues and the NRC's March 2, 2010, Chilling Effects Letter; and the Unit 3 SG replacement activities. Summaries of selected articles are provided below.

New Chief At San Onofre To Find Answer For Human Performance Issues The Orange County Register (11/19, Brennan, 202K) reports, "Big changes are in the works at the San Onofre nuclear plant -- in the case of the unit 3 reactor dome, quite literally. A large hole 28-feet on a side has been cut into the dome to allow the replacement of two 640-ton steam generators, the last stage of a \$671 million engineering project that will likely span a decade by the time it is finished." Also, the Register adds, amid scrutiny from the NRC, "a new chief nuclear officer arrived at the plant" this week. "Personnel problems have plagued the nuclear plant, owned by Southern California Edison, in recent years, leading to stepped up federal inspections but resulting in no findings of significant threats to the safety of the public or employees." Chief Nuclear Officer Pete Dietrich "must take charge of another major project: answering findings of 'human performance' problems at the nuclear plant by the Nuclear Regulatory Commission."

New Exec Selected For San Onofre Station. The San Clemente Times (11/10) reports, "The Southern California Edison (SCE) Board of Directors has elected Peter (Pete) Dietrich senior vice president and chief nuclear officer, effective December 9." In the new role, "Dietrich will be responsible for all operational, engineering and regulatory aspects of the utility's nuclear power program. He succeeds Joe Sheppard, who was serving as interim chief nuclear officer following the departure of Ross Ridenoure, who stepped down September 2." Dietrich "came to Southern California Edison from Entergy Nuclear Operations, where he was site vice president of the James A. FitzPatrick Nuclear Power Plant in Lycoming, New York."

Blog: Dietrich Comes From Quiet Facility. On its "OCWatchdog" blog, the Orange County Register (11/9, Sforza) says that "Things have been a bit less exciting at FitzPatrick than at San Onofre as of late: FitzPatrick had just six low-level (green) inspection blips since Dec. 31, according to NRC reports, compared to San Onofre's 34 low-level blips, and one slightly more serious blip (white). San Onofre also got a 'chilling effect letter' from the Nuclear Regulatory Commission in the spring regarding 'a growing perception by employees that if they were to raise concerns, they would have retaliation," NRC spokeswoman Lara Uselding said at the time."

San Onofre Reactor To Be Shut Down For Planned Maintenance, Refueling. The Orange County Register (10/11, 202K) reported, "Southern California Edison has shut down the Unit 3 reactor at the San Onofre Nuclear Generating Station for a planned maintenance and refueling project that will include replacing the unit's two massive steam generators. The company expects the reactor to be out of service three to four months, spokesman Gil Alexander said. Unit 3, the southernmost of San Onofre's two steel-reinforced concrete domes, was shut down at 1:26 a.m. Sunday, Alexander said."

Zacks (10/11) reported, "Southern California Edison (SCE), a unit of Edison International, is going to initiate a major construction program at Unit 3 of its San Onofre Nuclear Generating Station in California. As a part of this, the company is shutting down one of its two reactor units at the 1,080-megawatt plant this fall. The construction project entails the replacement of the plant's steam generators, refueling the reactor and maintenance works at the plant. The company expects the construction outage at the plant to last for three to four months." The project involves replacing the plant's steam generators, noting that "each of the new steam generators being installed at the Unit 3 are 65 feet tall, 22 feet in diameter and weigh 640 tons. These steam generators produce steam that drives the plant's turbines and produces electricity to serve an average of 1.4 million households." This project will also add 1,000 temporary jobs to the region, as well as injecting \$300 million into the local economy.

New Chief At San Onofre Station Juggles Upcoming Retrofit, NRC Attention. A profile piece for the San Diego Union-Tribune (10/8, Soto) reports on Joe Sheppard, who "was named interim chief nuclear officer of the San Onofre Nuclear Generating Station a month ago," he "took on a plant in the middle of a major revamp and one facing criticism from federal regulators." Sheppard, a veteran nuclear plant manager "told his new bosses he wouldn't sit still. ... 'I enjoy what I do every day, but I've done it for 40 years,' he said." Sheppard "took the job from Ross Ridenoure, who left for unspecified reasons in September, with the company saying only that it was 'in the best interest of the station.'" But the upcoming retrofit is "not the only thing on Sheppard's mind." NRC officials "said the plant was getting nearly 10 times as many complaints than an average nuclear facility," and "Sheppard said he knows of the concerns and is working on them."

NRC Resident Inspector Notes San Onofre Plant "Improvement." The Orange County (CA) Register (9/17, Swegles) reports, "Federal inspectors said Thursday night that Southern California Edison is responding to calls to upgrade safety consciousness at the San Onofre Nuclear Generating Station. 'I've been at the site now for 2 ½ years and I could not tell you that I have not seen improvement,' Greg Warnick, the Nuclear Regulatory Commission's senior resident inspector at San Onofre, said at a public meeting" last week. "'In fact, I've seen a lot of improvement.' ... Warnick said worker complaints there remain at a high level. In March, the NRC took the unusual step of issuing a 'chilling effects' letter advising Edison that San Onofre

was producing nearly 10 times the median for worker allegations at a nuclear power plant." But new chief nuclear officer at San Onofre, Joe Sheppard, said "You build trust slowly."

NRC Resident Inspector Says Some San Onofre Employees Still Fear To Speak Up. In covering the NRC hearing Thursday to discuss San Onofre employees' fear of retaliation if they report problems, the North County (CA) Times (9/17, Sisson) noted that during the hearing, San Onofre Station's chief resident inspector said Thursday that he still encounters employees who do not trust management enough to report problems at the plant, despite a rare and especially stern warning from regulators in March. 'It's pretty evident to us that you need to continue to build trust,' said Greg Warnick, the Nuclear Regulatory Commission's top inspector at San Onofre." The Times adds, "Several top executives said they have taken numerous steps, from small meetings throughout the plant, to moving the office where employees can report problems to a more central location," but according to Warnick, despite those changes, "he and other on-site inspectors continue to hear from employees who fear retaliation for speaking up."

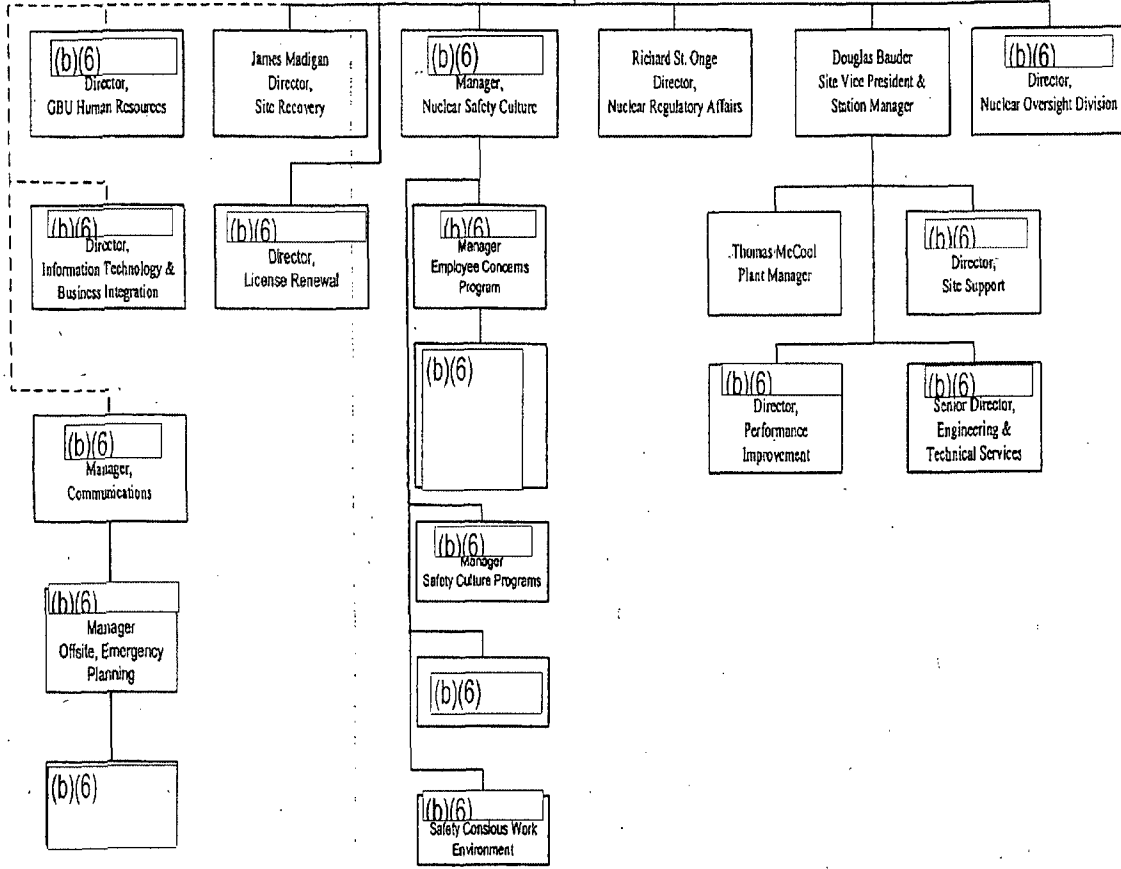
Significant Reportable Events and Activities

4/4/2010 - Notice of Unusual Event - 6.9 magnitude earthquake in Baja, California (Mexico). No damage to safety-related equipment was identified.

NUCLEAR GENERATION
AS OF SEPTEMBER 1, 2010

James J. Sheppard
Senior Vice President,
Chief Nuclear Officer

(b)(6)
Executive Assistant

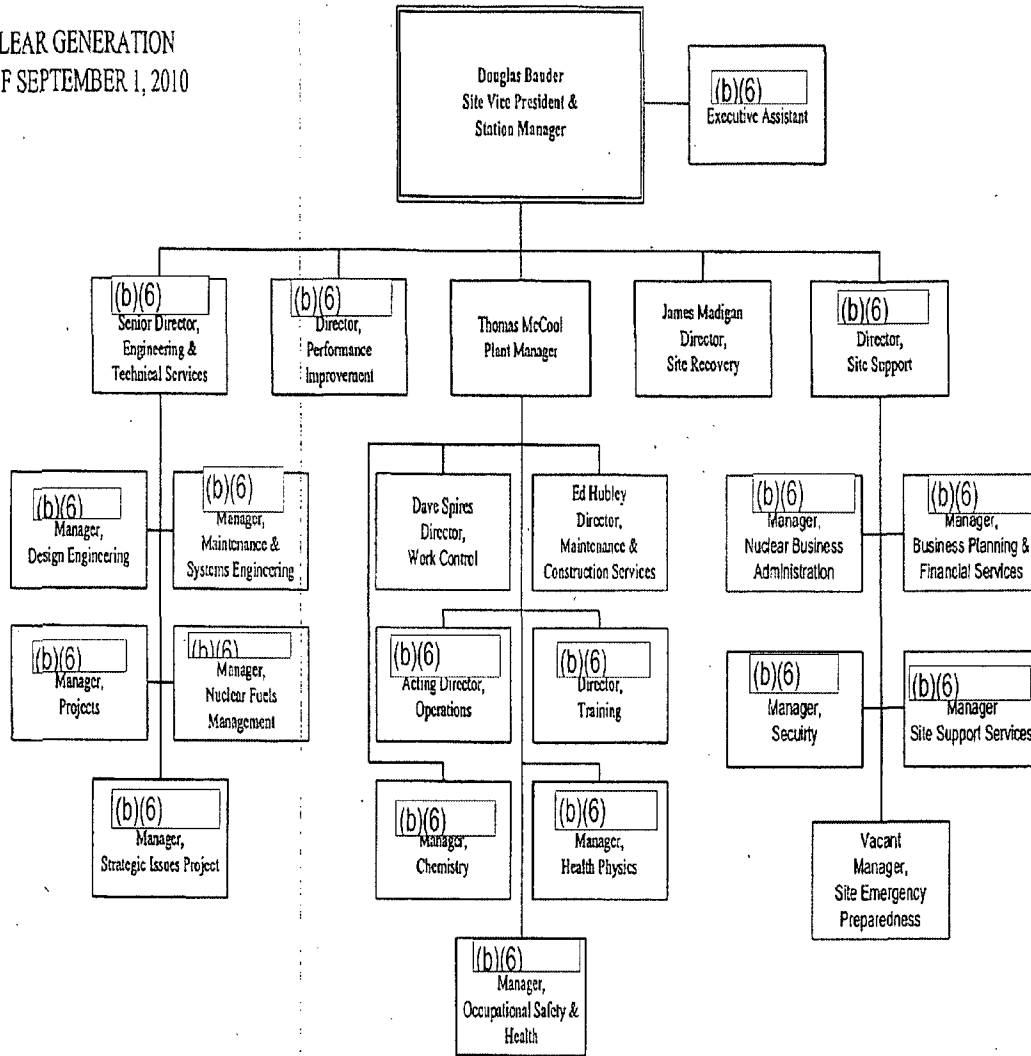


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FACILITY ORGANIZATION
SAN ONOFRE NUCLEAR GENERATING STATION

NUCLEAR GENERATION
AS OF SEPTEMBER 1, 2010



SAN ONOFRE NUCLEAR GENERATING STATION

Biographical Data of Principal Managers

(as provided by the licensee)

The biographical data for the following visitors are attached:

- Peter T. Dietrich, Senior Vice President and Chief Nuclear Officer, SCE
- Richard J. St. Onge, Director, Nuclear Regulatory Affairs, SCE



Peter T. Dietrich

**Senior Vice President and
Chief Nuclear Officer,
San Onofre Nuclear Generating Station**

Southern California Edison

Effective December 9, 2010, Pete Dietrich will become the senior vice president and chief nuclear officer for Southern California Edison (SCE), responsible for all aspects of the company's nuclear business, including operations, engineering, oversight, and regulatory activities of the company's San Onofre Nuclear Generating Station (SONGS) located in north San Diego County.

Mr. Dietrich was the Site Vice President at Entergy's James A. FitzPatrick Nuclear Power Plant in New York, a position he held since April 2006. As the site VP, he was responsible for safe and efficient plant operation including the direction, management, performance, and profitability of the plant and its supporting facilities. From 2001 through 2006, he was the General Manager of Plant Operations at the Pilgrim nuclear power plant, where he was responsible for the safe and reliable operation of the plant as well as maintenance, work management, outage performance, operations review, radiation protection, chemistry, industrial safety and human performance. From 2000 through 2001, he was the Director of Strategic Planning for Deregulation and Merger Activities at Entergy, responsible for valuation of generation assets associated with deregulation activities in Texas and Arkansas, and merger activities with FPL. Mr. Dietrich began his career with Entergy in 1991 at Arkansas Nuclear One, where he held a variety of positions in Operations, Maintenance, and Engineering up through Maintenance Manager; qualified as Shift Technical Advisor; and was licensed as a Professional Engineer. Mr. Dietrich served in the U.S. Navy Nuclear Power Program from 1986 to 1991.

Mr. Dietrich holds a Bachelor of Science degree in Naval Architecture from the U.S. Naval Academy, and a Master's Degree in Business Administration from Tulane University. He has also completed the Senior Nuclear Plant Management Course, conducted by the National Academy for Nuclear Training.



Richard J. St. Onge

Director, Nuclear Regulatory Affairs

Southern California Edison

Mr. Richard St. Onge is currently the Director of Regulatory Affairs at the San Onofre Nuclear Generating Station (SONGS), which is owned and operated by Southern California Edison (SCE). Previously, Mr. St. Onge held the position of Director, Maintenance and Systems Engineering at SONGS. He has been a licensed Senior Reactor Operator/Control Room Supervisor at the facility. Mr. St. Onge has held various other positions: with a NSSS supplier (Combustion Engineering), at the Pilgrim Nuclear Station, and in reactor refueling services, plant, system and design engineering.

Mr. St. Onge is a Registered Professional Engineer, State of California, Nuclear Engineering. Mr. St. Onge also is an Executive Member of the Operations & Power Division of the American Nuclear Society. Mr. St. Onge holds a Bachelor of Science Degree in Nuclear Engineering and a Masters Degree in Business Administration.