

10 CFR 50.54(f)

June 6, 2012

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: **Docket Nos. 50-361 and 50-362**
Southern California Edison Response to NRC Request for
Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic
Aspects of Recommendation 2.1 of the Near-Term Task Force
Review of Insights from the Fukushima Dai-ichi Accident
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 1 of Reference 1 contains specific Requested Actions, Requested Information, and Required Responses associated with Recommendation 2.1, Seismic Evaluations. Reference 1 requires that, if an addressee cannot meet the requested response date, it must provide a response to the NRC within 90 days of the date of the information request describing the licensee's proposed alternative course of action, the basis for the acceptability of the proposed alternative course of action, and the estimated completion dates.

Southern California Edison (SCE) cannot determine if it can meet the requested response dates for submitting the Seismic Hazard Evaluation and the Seismic Risk Evaluation (items 1 through 9 of Reference 1) until the Screening, Prioritization and Implementation Details (SPID) guidance is endorsed by the NRC.

Within 60 days of NRC endorsement of the SPID guidance, SCE will submit: (1) its intention to follow the endorsed guidance, or (2) an alternative approach. At that time, SCE will assess whether it can meet the submittal deadlines for the Seismic Hazard Evaluation and Seismic Risk Evaluation and take the appropriate regulatory action.

The response date for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 seismic hazard evaluation was identified as March 12, 2015, which corresponds to three years from the date of Reference 1. Enclosure 1 of Reference 1 states that if an addressee cannot meet the requested response date, then the addressee must provide a response within 90 days of the date of the letter and describe the alternative course of action that it proposes to take, including the basis of the acceptability of the proposed alternative course of action and estimated completion date. This letter provides SCE's response to this requirement with respect to performance of a Senior Seismic Hazard Analysis Committee (SSHAC) Level 3 in accordance with NUREG 2117 for Ground Motion Characterization (GMC) and Seismic Source Characterization (SSC).

Currently, it is SCE's intent to perform a SSHAC Level 3 in accordance with NUREG-2117 for GMC and SSC, and to meet the schedule for completion of the subsequent Seismic Hazards Evaluation for SONGS Units 2 and 3 specified in Reference 1. However, an alternate plan may be necessary because the number of personnel available with the level of seismic expertise necessary to participate in the SSHAC process for Western U.S. (WUS) nuclear power plants is limited. The WUS plants will be performing 6-8 SSHACs within this three year period. This resource limitation has the potential to delay the development of the new models needed for performance of the Seismic Hazards Evaluation within three years.

SCE is currently retaining experts and coordinating with other WUS nuclear plant licensees concerning the performance of the required SSHAC Level 3 activities. Completion of these actions will permit SCE and the other WUS plants to better estimate the time frames needed for implementation of the SSHAC Level 3 process. If it is determined that SCE will be unable to implement these activities on a schedule that supports completion of a Seismic Hazards Evaluation for SONGS Units 2 and 3 by March 12, 2015, as required by Reference 1, SCE proposes to meet with the NRC to agree upon a new completion date. Additionally, if resource constraints develop during the estimated 2.5 years it will take to complete the SSHAC Level 3 process, SCE would propose to meet with the NRC to develop a revised mutually agreeable schedule. Any revised schedule would consider prioritization of the limited available resources for the WUS sites.

SCE believes that this course of action is acceptable because it will result in performance of the SSHAC process and Seismic Hazards analysis as soon as reasonably possible for SONGS Units 2 and 3 in light of limited seismic resources and in accordance with applicable NRC guidance.

This letter contains no new regulatory commitments.

Should you have any questions concerning the content of this letter, please contact Cheryl Atooli at 949-368-3842.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6th, 2012

By: 

Douglas R. Bauder
Site Vice President and Station Manager

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