

From: [Benney, Brian](#)
To: Linda.Conklin@sce.com
Cc: [Burkhardt, Janet](#); [Chen, Qiao-Lynn](#)
Subject: ME6820-21 RAIs
Date: Tuesday, October 09, 2012 11:28:57 AM

Dear Ms. Conklin:

By letter dated July 29, 2011, (Agencywide Documents Access and Management System Accession No. ML112150247), Southern California Edison (SCE), the licensee, requested a revision to Operating Licenses NFP-10 and NFP-15 for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. The licensee is requesting a permanent license exemption from the requirements of 10 CFR 50.46 and 10 CFR 50 Appendix K, to the extent to which these regulations limit acceptable cladding materials to only Zircaloy and ZIRLO™. The requested exemption will allow the use of fuel rods clad with AREVA M5™ cladding.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee and determined that the additional information identified in the attachment is needed in order for the NRC staff to complete its review. The staff is requesting a written response to the RAIs no later than October 15, 2012.

Please contact me if you would like to have a clarifying conference call.

Thank you,
Brian Benney

REQUEST FOR ADDITIONAL INFORMATION REGARDING SAN ONOFRE LICENSE EXEMPTION FOR UNRESTRICTED USE OF AREVA FUEL

The Nuclear Regulatory Commission (NRC) staff is reviewing the Southern California Edison (SCE) license amendment request (LAR) dated July 29, 2011. The LAR requests a license exemption for unrestricted use of Areva fuel. The NRC staff has determined that the following information is required to complete its review.

1. Has the licensee identified any impact to operator interfaces associated with the proposed LAR, such as:
 - a. Changes, additions, or deletions of operator actions?
 - b. Changes to the timing of actions or the time available for actions?
 - c. Changes, additions, or deletions to emergency or abnormal operating procedures?
 - d. Changes, additions, or deletions control room controls, displays (including the safety parameter display system) or alarms?
 - e. Changes, additions, or deletions to the control room plant reference simulator?
 - f. Changes, additions, or deletions to the operator training program?

If yes to any of the above, describe and justify acceptability. If no to all, stop here and respond to this question only.

2. Does the licensee intend to resolve the issues identified in Item 1. above (including the training of operators, if required), prior to operation using AREVA fuel? If no, justify why this is acceptable.