

November 5, 2012

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

Subject: **Docket Nos. 50-361 and 50-362**
Response to Request for Additional Information Regarding License
Amendment Request for Permanent Use of AREVA Fuel
and for Permanent Exemption to Use M5 Cladding
(TAC Nos. ME6820, ME6821, ME6822, AND ME6823)
San Onofre Nuclear Generating Station, Units 2 and 3

References: 1. Letter from N. Kalyanam (NRC) to P. T. Dietrich (SCE) dated August 1, 2012; Subject: San Onofre Nuclear Generating Station, Units 2 and 3 License Amendment Request RE: Use of AREVA Fuel (TAC Nos. ME6820, ME6821, ME6822, AND ME6823)

2. Letter from D. Bauder (SCE) to J. Sebrosky (NRC) dated July 29, 2011; Subject: San Onofre Nuclear Generating Station, Units 2 and 3 Proposed Permanent Exemption Request and Proposed Change, Number (PCN) 600, Amendment Application Numbers 261 and 249, Request for Unrestricted Use of AREVA Fuel.

Dear Sir or Madam:

By request dated October 9, 2012, the Nuclear Regulatory Commission issued a Request for Additional Information (RAI) regarding unrestricted use of AREVA fuel and permanent exemption to use M5 cladding. The RAI requested a response on October 15, 2012. NRC staff agreed by phone that SCE may submit the response by November 8, 2012. The enclosure of this submittal contains the response to the request for additional information.

There are no new regulatory commitments contained in this letter. If you have any questions or require additional information, please contact Ms. Linda T. Conklin, Licensing Manager, at (949) 368-9443.

Sincerely,



Enclosure: Response to Request for Additional Information (RAI) regarding unrestricted use of AREVA fuel and permanent exemption to use M5 cladding

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

ENCLOSURE 1

**Response to Request for Additional
Information (RAI) regarding unrestricted
use of AREVA fuel and permanent
exemption to use M5 cladding**

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?

SCE Response: No.

b. Changes to the timing of actions or the time available for actions?

SCE Response: Yes. As identified in PCN-600 Attachment D, item D.56, the existing operator action to trip the Reactor Coolant Pumps on loss of net positive suction head now has a 7 minute time requirement associated with its performance. This 7 minute time requirement is being added to a new procedure, SO123-0-A9, "Time Critical Action Program." This program will validate and document the actual timing of the operator actions.

c. Changes, additions, or deletions to emergency or abnormal operating procedures?

SCE Response: Yes. As identified in PCN-600 Attachment D, item D.56 the Emergency Operating Instructions will be updated as needed to incorporate the 7 minute time requirement.

d. Changes, additions, or deletions control room controls, displays (including the safety parameter display system) or alarms?

SCE Response: No.

e. Changes, additions, or deletions to the control room plant reference simulator?

SCE Response: No

f. Changes, additions, or deletions to the operator training program?

SCE Response: Yes. As identified in PCN-600 Attachment D, item D.56 the operator training to support the 7 minute time requirement is being tracked as a requirement for implementation of this PCN. Operator training will incorporate SO123-0-A9, "Time Critical Action Program", to ensure the 7 minute time requirement will be met during simulator scenario exercises and dynamic tests.

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.

SCE Response: Yes. A formal training request is in place to train on the new time requirement to secure the Reactor Coolant Pumps (RCPs) within 7 minutes of losing RCP net positive suction head during a Small Break LOCA. This training will be completed prior to use of AREVA fuel per this PCN