

November 28, 2012

10 CFR 2.390

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

Subject: **Docket No. 50-361**
Confirmatory Action Letter Response – Proprietary Documents
San Onofre Nuclear Generating Station, Unit 2

- References:
1. Letter from Mr. Elmo E. Collins (USNRC) to Mr. Peter T. Dietrich (SCE), dated March 27, 2012, Confirmatory Action Letter 4-12-001, San Onofre Nuclear Generating Station, Units 2 and 3, Commitments to Address Steam Generator Tube Degradation
 2. Letter from Mr. Peter T. Dietrich (SCE) to Mr. Elmo E. Collins (USNRC), dated October 3, 2012, Confirmatory Action Letter – Actions to Address Steam Generator Tube Degradation, San Onofre Nuclear Generating Station, Unit 2

Dear Sir or Madam,

On March 27, 2012, the Nuclear Regulatory Commission (NRC) issued a Confirmatory Action Letter (CAL) (Reference 1) to Southern California Edison (SCE) describing actions that the NRC and SCE agreed would be completed to address issues identified in the steam generator tubes of San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. In a letter to the NRC dated October 3, 2012 (Reference 2), SCE reported completion of the Unit 2 CAL actions and included a Return to Service Report (RTSR) that provided details of their completion.

The purpose of this letter is to respond to an information request from the NRC associated with the Unit 2 CAL response. Specifically, the NRC requested submittal of proprietary versions of the nonproprietary attachments to the RTSR provided in the October 3, 2012 response. Enclosures 1 – 6 of this submittal provide the requested documents as listed in the table below. Because the enclosures contain information that is proprietary, SCE requests that this information be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4). Enclosures 7-13 (also listed in the table) include notarized affidavits which provide the basis on which the information in each document may be withheld from public disclosure by the NRC and address with specificity the considerations listed by paragraph (b)(4) of 10 CFR 2.390.

This letter does not contain any commitments. Please call me at (949) 368-6240 should you require any further information.

**Proprietary Information
Withhold from Public Disclosure**

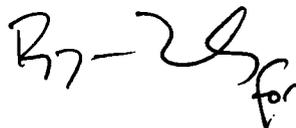
Document Control Desk

-2-

November 28, 2012

Enclosure	Title	RTSR Reference	Applicable Affidavit Enclosure(s)
1	AREVA NP Document 51-9182368-003, SONGS 2C17 Steam Generator Condition Monitoring Report	Attachment 2	7 and 11
2	AREVA NP Document 51-9180143-001 SONGS Unit 3 February 2012 Leaker Outage Steam Generator Condition Monitoring Report	Attachment 3	8 and 13
3	MHI Document L5-04GA564, Rev. 9, Tube Wear of Unit-3 RSG – Technical Evaluation Report	Attachment 4	12
4	MHI Document L5-04GA571, Rev. 6, Screening Criteria for Susceptibility to In-Plane Tube Motion	Attachment 5	12
5	AREVA NP Document 51-9182833-002, SONGS U2C17 Outage – Steam Generator Operational Assessment	Attachment 6, Appendix A	9 and 13
6	AREVA NP Document 51-9187230-000, SONGS U2C17 Steam Generator Operational Assessment for Tube-to-Tube Wear	Attachment 6, Appendix B	10 and 11
7	Affidavit by AREVA NP for Enclosure 1 (AREVA document 51-9182368-003)	N/A	N/A
8	Affidavit by AREVA NP for Enclosure 2 (AREVA document 51-9180143-001)	N/A	N/A
9	Affidavit by AREVA NP for Enclosure 5 (AREVA NP Document 51-9182833-002)	N/A	N/A
10	Affidavit by AREVA NP for Enclosure 6 (AREVA NP Document 51-9187230-000)	N/A	N/A
11	Affidavit by MHI for Enclosures 1 and 6 (AREVA documents 51-9182368-003 and 51-9187230-000)	N/A	N/A
12	Affidavit by MHI for Enclosures 3 and 4 (MHI documents L5-04GA564 and L5-04GA571)	N/A	N/A
13	Affidavit by MHI for Enclosures 2 and 5 (AREVA NP documents 51-9180143-001 and 51-9182833-002)	N/A	N/A

Sincerely,



Enclosures: As stated

cc (w/o enclosures):

- 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
- R. E. Lantz, Branch Chief, Division of Reactor Projects, NRC Region IV

**Proprietary Information
Withhold from Public Disclosure**

ENCLOSURE 7

**Affidavit by AREVA NP for Enclosure 1
(AREVA document 51-9182368-003)**

**Proprietary Information
Withhold from Public Disclosure**

this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

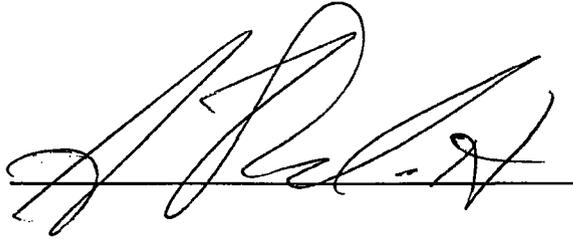
The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been

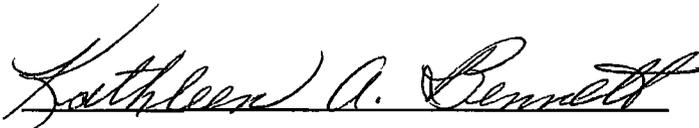
made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

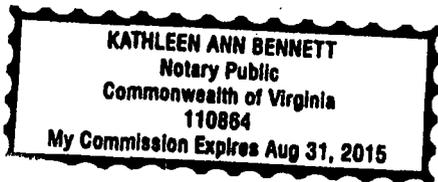
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



SUBSCRIBED before me this 1st
day of October 2012.



Kathleen Ann Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/15
Reg. # 110864



**Proprietary Information
Withhold from Public Disclosure**

ENCLOSURE 8

**Affidavit by AREVA NP for Enclosure 2
(AREVA document 51-9180143-001)**

**Proprietary Information
Withhold from Public Disclosure**

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- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

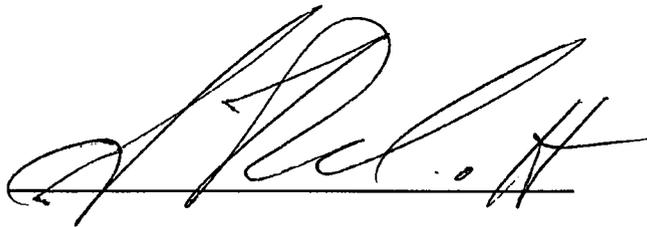
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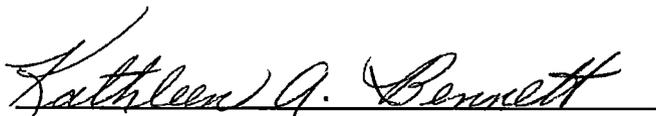
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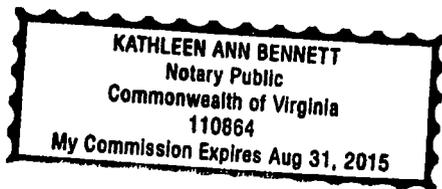
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

A large, stylized handwritten signature in black ink, appearing to be 'A. P. H.', written over a horizontal line.

SUBSCRIBED before me this 5th
day of September 2012.

A handwritten signature in black ink that reads 'Kathleen A. Bennett', written over a horizontal line.

Kathleen Ann Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/15
Reg. # 110864



**Proprietary Information
Withhold from Public Disclosure**

ENCLOSURE 9

**Affidavit by AREVA NP for Enclosure 5
(AREVA NP Document 51-9182833-002)**

**Proprietary Information
Withhold from Public Disclosure**

this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

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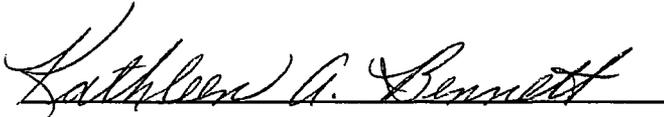
made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

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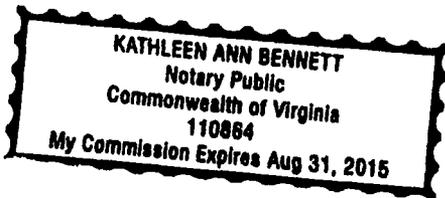
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



SUBSCRIBED before me this 5th
day of September 2012.



Kathleen Ann Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/15
Reg. # 110864



**Proprietary Information
Withhold from Public Disclosure**

ENCLOSURE 10

**Affidavit by AREVA NP for Enclosure 6
(AREVA NP Document 51-9187230-000)**

**Proprietary Information
Withhold from Public Disclosure**

this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

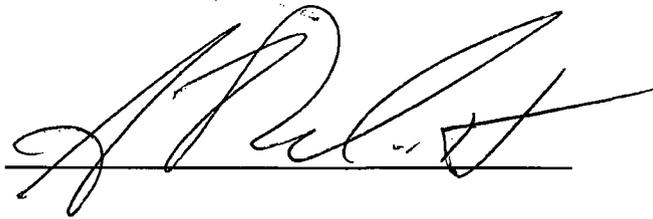
The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been

made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

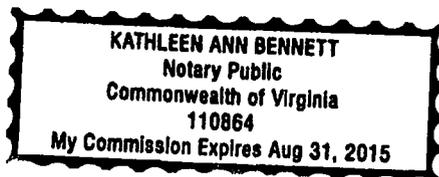
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to be 'A. Bennett', written over a horizontal line.

SUBSCRIBED before me this 1st
day of October 2012.

A handwritten signature in black ink, 'Kathleen A. Bennett', written over a horizontal line.

Kathleen Ann Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/15
Reg. # 110864



**Proprietary Information
Withhold from Public Disclosure**

ENCLOSURE 11

**Affidavit by MHI for Enclosures 1 and 6
(AREVA documents 51-9182368-003 and 51-9187230-000)**

**Proprietary Information
Withhold from Public Disclosure**

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Jinichi Miyaguchi, state as follows:

1. I am Director, Nuclear Plant Component Designing Department, of Mitsubishi Heavy Industries, Ltd. ("MHI"), and have been delegated the function of reviewing the referenced AREVA's technical documentations to determine whether they contain MHI's information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information that is privileged or confidential.
2. In accordance with my responsibilities, I have reviewed AREVA's documents, 51-9177491-000, 51-9180144-000, 51-9187230-000 and 51-9182368-003, and have determined that they contain MHI proprietary information that should be withheld from public disclosure. Those pages containing proprietary information have been bracketed with an open and closed bracket as shown here "[]" / and should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).
3. The information identified as proprietary in the documents has in the past been, and will continue to be, held in confidence by MHI and its disclosure outside the company is limited to regulatory bodies, customers and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
4. The basis for holding the referenced information confidential is that it describes unique design, manufacturing, experimental and investigative information developed by MHI and not used in the exact form by any of MHI's competitors. This information was developed at significant cost to MHI, since it is the result of an intensive MHI effort.
5. The referenced information was furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of information to the NRC staff.
6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. Other than through the provisions in paragraph 3 above, MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.

7. Public disclosure of the referenced information would assist competitors of MHI in their design and manufacture of nuclear plant components without incurring the costs or risks associated with the design and the manufacture of the subject component. Therefore, disclosure of the information contained in the referenced document would have the following negative impacts on the competitive position of MHI in the U.S. and world nuclear markets:

- A. Loss of competitive advantage due to the costs associated with development of technologies relating to the component design, manufacture and examination. Providing public access to such information permits competitors to duplicate or mimic the methodology without incurring the associated costs.

- B. Loss of competitive advantage of MHI's ability to supply replacement or new heavy components such as steam generators.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

Executed on this 28 day of September, 2012.

Jinichi Miyaguchi

Jinichi Miyaguchi,
Director- Nuclear Plant Component Designing Department
Mitsubishi Heavy Industries, LTD

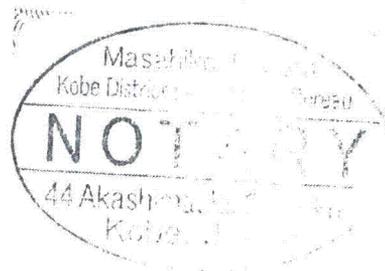
Sworn to and subscribed

Before me this 28 day

of September, 2012

Masahiko Kubota

Notary Public



SEP. 28. 2012

293

My Commission Expires _____

登簿平成24年第293号

認 証

囑託人 三菱重工業株式会社 原子力事業本部

原子力製造総括部 原子力機器設計部 部長 宮

口仁一 は本職の面前で添付書面に 署名 した。



よって認証する。

平成24年9月28日

本職役場に於て

神戸市中央区明石町44番地

神戸地方法務局所属

公証人

窪田正彦

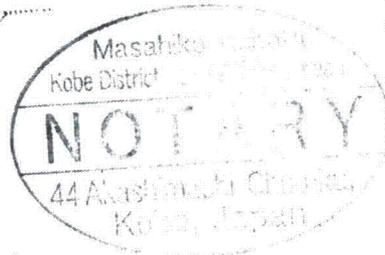
公 証 人 役 場

Registered Number 293

Date SEP. 28. 2012

NOTARIAL CERTIFICATE

This is to certify that JINICHI MIYAGUCHI , Director-Nuclear
Plant Component Designing Department MITSUBISHI HEAVY INDUSTRIES,
LTD has affixed his signature in my very presence to the attached
document.



Masahiko Kubota

MASAHIKO KUBOTA

Notary

44 Akashimachi, Chuo-Ku,

Kobe, Japan

Kobe District Legal Affairs Bureau

(面前法2)

**Proprietary Information
Withhold from Public Disclosure**

ENCLOSURE 12

**Affidavit by MHI for Enclosures 3 and 4
(MHI documents L5-04GA564 and L5-04GA571)**

**Proprietary Information
Withhold from Public Disclosure**

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Jinichi Miyaguchi, state as follows:

1. I am Director, Nuclear Plant Component Designing Department, of Mitsubishi Heavy Industries, Ltd. ("MHI"), and have been delegated the function of reviewing the referenced MHI technical documentation to determine whether it contains information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information that is privileged or confidential.
2. In accordance with my responsibilities, I have determined that the following MHI documents and drawings contain MHI proprietary information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4). The drawings in their entirety are proprietary and those pages of the documents containing proprietary information have been bracketed with an open and closed bracket as shown here "[]" / and should be withheld from public disclosure.

MHI documents and drawings

Document: L5-04GA561, L5-04GA564, L5-04GA571, L5-04GA585, L5-04GA591

Drawings: L5-04FU101 thru 108

3. The information identified as proprietary in the enclosed document has in the past been, and will continue to be, held in confidence by MHI and its disclosure outside the company is limited to regulatory bodies, customers and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
4. The basis for holding the referenced information confidential is that it describes unique design, manufacturing, experimental and investigative information developed by MHI and not used in the exact form by any of MHI's competitors. This information was developed at significant cost to MHI, since it is the result of an intensive MHI effort.
5. The referenced information was furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of information to the NRC staff.



6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. Other than through the provisions in paragraph 3 above, MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.

7. Public disclosure of the referenced information would assist competitors of MHI in their design and manufacture of nuclear plant components without incurring the costs or risks associated with the design and the manufacture of the subject component. Therefore, disclosure of the information contained in the referenced document would have the following negative impacts on the competitive position of MHI in the U.S. and world nuclear markets:
 - A. Loss of competitive advantage due to the costs associated with development of technologies relating to the component design, manufacture and examination. Providing public access to such information permits competitors to duplicate or mimic the methodology without incurring the associated costs.

 - B. Loss of competitive advantage of MHI's ability to supply replacement or new heavy components such as steam generators.



I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

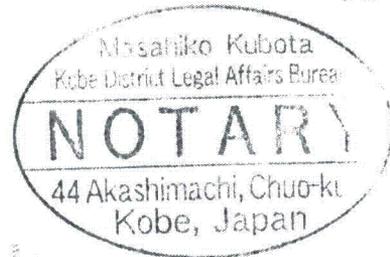
Executed on this 2 day of August, 2012.

Jinichi Miyaguchi

Jinichi Miyaguchi,
Director- Nuclear Plant Component Designing Department
Mitsubishi Heavy Industries, LTD

220

AUG. -2. 2012



Sworn to and subscribed

Before me this 2 day

of August, 2012

Masahiko Kubota

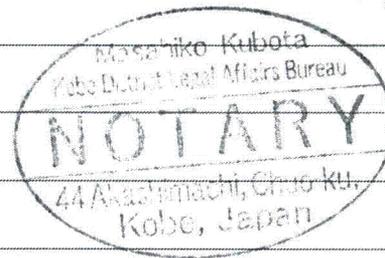
Notary Public

My Commission Expires _____

登簿平成24年第220号

認 証

囑託人 三菱重工業株式会社 原子力事業部 原
子力誠三総括部 原子力機器設計部 部長 宮口
仁一 は本職の面前で添付書面に 署名 した。



よって認証する。

平成24年8月2日

本職役場に於て

神戸市中央区明石町44番地

神戸地方法務局所属

公証人

窪田正彦

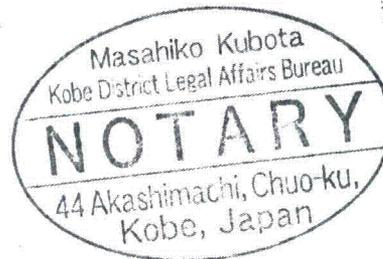
公証人役場

Registered Number 220

Date AUG. -2. 2012

NOTARIAL CERTIFICATE

This is to certify that JINICHI MIYAGUCHI , Director-Nuclear Plant
Component Designing Department MITSUBISHI HEAVY INDUSTRIES, LTD
has affixed his signature in my very presence to the attached
document.



Masahiko Kubota

MASAHIKO KUBOTA

Notary

44 Akashimachi, Chuo-Ku,

Kobe, Japan

Kobe District Legal Affairs Bureau

(面前法2)

**Proprietary Information
Withhold from Public Disclosure**

ENCLOSURE 13

**Affidavit by MHI for Enclosures 2 and 5
(AREVA NP documents 51-9180143-001 and 51-9182833-002)**

**Proprietary Information
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MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

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1. I am Director, Nuclear Plant Component Designing Department, of Mitsubishi Heavy Industries, Ltd. ("MHI"), and have been delegated the function of reviewing the referenced AREVA's technical documentations to determine whether they contain MHI's information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information that is privileged or confidential.
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 - B. Loss of competitive advantage of MHI's ability to supply replacement or new heavy components such as steam generators.



I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

Executed on this 22 day of October, 2012.

Jinichi Miyaguchi

Jinichi Miyaguchi,
Director- Nuclear Plant Component Designing Department
Mitsubishi Heavy Industries, LTD

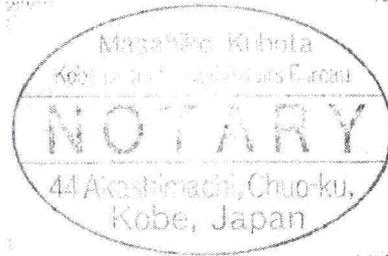
Sworn to and subscribed

Before me this 22 day

of October, 2012

Masahiko Kubota

Notary Public



My Commission Expires _____

OCT. 22, 2012

316

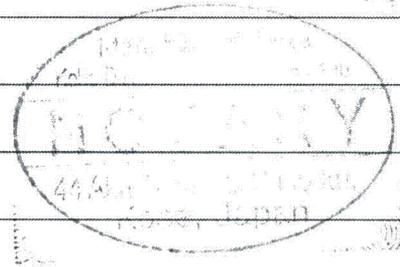
登簿平成24年第316号

認 証

囑託人 三菱重工業株式会社 原子力事業部 原

子力製造総括部 原子力機器設計部 部長 宮口

仁一 は本職の面前で添付書面に 署名 した。



よって認証する。

平成24年10月22日

本職役場に於て

神戸市中央区明石町44番地

神戸地方法務局所属

公証人

窪田正彦

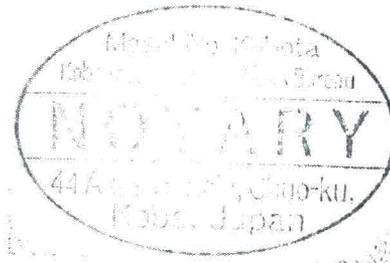
公 証 人 役 場

Registered Number 316

Date OCT. 22, 2012

NOTARIAL CERTIFICATE

This is to certify that JINICHI MIYAGUCHI, Director-Nuclear Plant
Component Designing Department MITSUBISHI HEAVY INDUSTRIES, LTD
has affixed his signature in my very presence to the attached
document.



Masahiko Kubota

MASAHIKO KUBOTA

Notary

44 Akashimachi, Chuo-Ku,

Kobe, Japan

Kobe District Legal Affairs Bureau

(面前法2)