

January 9, 2013

10 CFR 50.4

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

Subject: **Docket No. 50-361
Response to Request for Additional Information (RAI 30)
Regarding Confirmatory Action Letter Response
(TAC No. ME 9727)
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
 3. Letter from Mr. James R. Hall (USNRC) to Mr. Peter T. Dietrich (SCE), dated December 26, 2012, Request for Additional Information Regarding Response to Confirmatory Action Letter, 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.

By letter dated December 26, 2012 (Reference 3), the NRC issued Requests for Additional Information (RAIs) regarding the CAL response. Enclosure 2 of this letter provides the response to RAI 30.

Enclosure 2 of this submittal contains proprietary information. SCE requests that this proprietary enclosure be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4). Enclosure 1 provides a notarized affidavit from Mitsubishi Heavy Industries (MHI), which sets

**Proprietary Information
Withhold from Public Disclosure
Decontrolled Upon Removal From Enclosure 2**

**Proprietary Information
Withhold from Public Disclosure**

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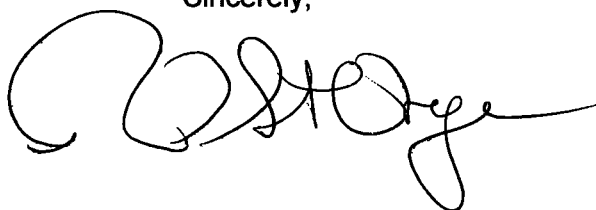
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forth the basis on which the information in Enclosure 2 may be withheld from public disclosure by the NRC and addresses with specificity the considerations listed by paragraph (b)(4) of 10 CFR 2.390. Enclosure 3 provides the non-proprietary version of Enclosure 2.

There are no new regulatory commitments contained in this letter. If you have any questions or require additional information, please call me at (949) 368-6240.

Sincerely,

A handwritten signature in black ink, appearing to read "R. E. Lantz", with a long horizontal flourish extending to the right.

Enclosures:

1. Notarized Affidavits
2. Response to RAI 30 (Proprietary)
3. Response to RAI 30 (Non-proprietary)

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

ENCLOSURE 1

Notarized Affidavits

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 MHI's letter "MHI/SCE-12-0161: Figure of Percentage of Tube Wear vs. Maximum Interstitial Velocity (Reply to RAI #30)" and have determined that it contains 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 December, 2012.

Jinichi Miyaguchi

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

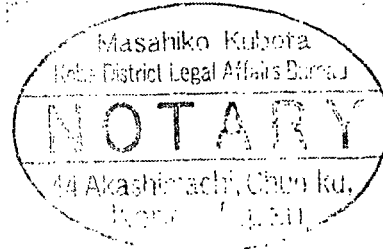
Sworn to and subscribed

Before me this 28 day

of December, 2012

Masahiko Kubota

Notary Public



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DEC. 28, 2012

My Commission Expires _____

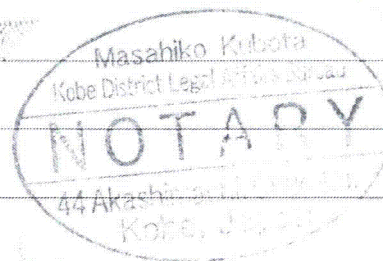
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認 証

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12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

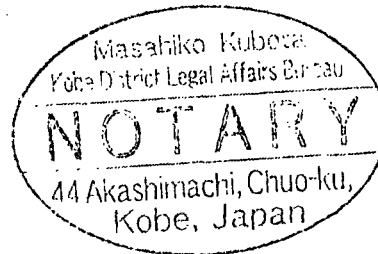
公 証 人 役 場

Registered Number 376

Date DEC. 27 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)

ENCLOSURE 3

SOUTHERN CALIFORNIA EDISON

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

REGARDING RESPONSE TO CONFIRMATORY ACTION LETTER

DOCKET NO. 50-361

TAC NO. ME 9727

**Response to RAI 30
(NON-PROPRIETARY)**

RAI 30

Reference 1, Figure 8-2 – Provide similar figure for maximum interstitial velocities.

Response

The following figure shows the percentage of tubes with tube-to-tube wear (TTW) indications at each range of maximum interstitial velocity at 100% power. In the figure, 2A, 2B, 3A and 3B represent steam generators (SGs) 2E089, 2E088, 3E089 and 3E088, respectively. As indicated in Table 8-3 of Reference 1, operating Unit 2 at 70% power reduces the maximum interstitial velocity in the SG secondary side to well below the velocities which resulted in TTW at 100% power.

