

10 CFR 50.4

March 8, 2013

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

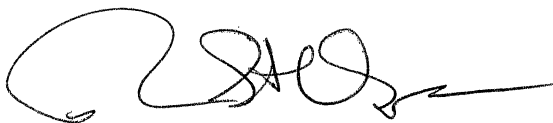
Subject: **Docket Nos. 50-206, 50-361, 50-362, and 72-41**
Summary Report of Commitment Changes Implemented During the Period From
March 29, 2012, Through March 01, 2013
San Onofre Nuclear Generating Station (SONGS) Units 1, 2 and 3, and the
Independent Spent Fuel Storage Installation

Dear Sir or Madam:

Pursuant to the guidance in Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0, attached is a summary of commitments changed during the period from March 29, 2012 through March 01, 2013. These commitment changes were evaluated by SONGS as not requiring prior NRC approval. This letter provides NRC notification of these changes. Attachment 1 includes a summary of regulatory commitment changes and a basis for each change. In addition, Attachment 2 provides a summary of changes to several voluntary commitments described in previous correspondence to the NRC. Although not considered formal regulatory commitments, SONGS has included these changes for your information.

This letter does not contain any new commitments. If you have any questions or would like any additional information, please contact Lee Kelly at (949) 368-6657.

Sincerely,



Attachments: As Stated

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

**ATTACHMENT 1- SUMMARY REPORT OF REGULATORY COMMITMENT CHANGES IMPLEMENTED
DURING THE PERIOD FROM MARCH 29, 2012 THROUGH MARCH 01, 2013**

SONGS Tracking Nos.	Source(s)	Proposed Action	Change Summary and Basis for Change
NRCTS 2007-04-001 NN 202315010	SCE letter to NRC, dated April 16, 2007, Reply to a Notice of Violation; EA-06-303 Inspection Report No. 5000361/2007402 and 5000362/2007402 San Onofre Nuclear Generation Station, Units 2 and 3	The following action was stated in the April 16, 2007 NOV response letter to NRC. “Corrective actions will be taken to provide a more positive confirmation of proper check performance, a long-term project was created to use hand-held computers, in conjunction with bar codes, to document area checks electronically.”	The action was modified to allow alternate methods of confirming proper area checks. The revised commitment wording is as follows: “Corrective actions will be taken to provide a more positive confirmation of proper area check performance.”

**ATTACHMENT 2 – SUMMARY OF CHANGES TO VOLUNTARY COMMITMENTS DESCRIBED IN PREVIOUS CORRESPONDENCE
TO NRC IMPLEMENTED DURING THE PERIOD FROM MARCH 29, 2012 THROUGH MARCH 01, 2013**

SONGS Tracking Nos.	Source(s)	Proposed Action	Change Summary and Basis for Change
NRCTS 2009-10-025 NN202312775	SCE letter to NRC, dated October 29, 2009, Independent Safety Culture Assessment Results and Action Plans (Response to NRC Mid-Cycle Performance Review Letter)	The following action was stated in the October 29, 2009, letter to the NRC. "Appoint a site leader to drive the application of change management."	Remove commitment from procedure S0123-XV-50.7 Change Management. The Performance Improvement Organization Chart no longer has a change management leader position. The Manager of Organizational Effectiveness will perform similar duties. SONGS procedure governing change management (S0123-XV-50.7) ensures this responsibility is implemented at SONGS.
NRCTS 2010-10-131 NN 201989673 SIBP 5.23.1.D	SCE letter to NRC, dated March 31, 2010, Response to NRC to NRC Mid-Cycle Performance Review Letter - Modifications to Submittals SCE letter to NRC, dated October 12, 2010, Response to the NRC Letter Regarding Midcycle Performance Review and Inspection Plan	The following action was stated in the October 12, 2010, letter to the NRC. "Issue an approved Change Management Plan in accordance with procedure S0123-XV-50.7 (Change Management) within 15 calendar days, after CARB approval of the RCE and submitted to CARB for review, that address potential resources, priority, and cost challenges throughout the station and includes, as appropriate, a training needs analysis." [CARB - Corrective Action Review Board RCE - Root Cause Evaluation	Revise the action to state: "After CARB approval of an RCE, evaluate the need for a Change Management Plan, IF required Then submit the Change Management Plan to CARB for review in accordance with S0123-XV-50.7." Removing the 15 day requirement allows the RCE team and CARB the ability to determine the appropriate time period to complete this evaluation and submit it to CARB.

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NRCTS 2010-10-132 NN 201872119-119 SIBP 5.23.1.E	SCE letter to NRC, dated October 12, 2010, Response to the NRC Letter Regarding Midcycle Performance Review and Inspection Plan	The following action was stated in the October 12, 2010, letter to the NRC. “Weekly update by Management Sponsor on their assigned RCE that is being conducted.”	Revise the action to state: “Periodic update by MANAGEMENT SPONSOR(s) on their assigned RCE that is being conducted.” The Performance Improvement Division consistently monitors the open CAP items, and works with the individual work groups to ensure timely and quality products are submitted to the CARB members in accordance with the CAP program requirements.
NRCTS 2010-10-133 NN 201872119-120 SIBP 5.23.1.F	SCE letter to NRC, dated October 12, 2010, Response to the NRC Letter Regarding Midcycle Performance Review and Inspection Plan	The following action was stated in the October 12, 2010, letter to the NRC. “Weekly review of open RCEs, ACEs, EFRs, and CAPRs completed but not yet reviewed by CARB”	Revise the action to state: “Periodic review of open RCEs, ACEs, EFRs, and CAPRs completed but NOT yet reviewed by CARB” The Performance Improvement Division consistently monitors the open CAP items, and works with the individual work groups to ensure timely and quality products are submitted to the CARB members in accordance with the CAP program requirements.

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SONGS Tracking Nos.	Source(s)	Proposed Action	Change Summary and Basis for Change
NRCTS 2010-03-007 NN 201994125-004 SIBP 4.6.1.A and 4.21.1.A	SCE letter to NRC, dated October 12, 2010, Response to the NRC Letter Regarding Midcycle Performance Review and Inspection Plan SCE letter to NRC, dated March 31, 2010, Response to NRC to NRC Mid-Cycle Performance Review Letter - Modifications to Submittals	The original proposed action was stated in the March 31, 2010 letter to NRC. Subsequently, the due date was changed from January 23, 2010 June 1, 2010, in SCE letter to NRC, dated March 31, 2010. The commitment was reiterated in the October 12, 2010 letter, as follows: “(CAPR) Revise S0123-XV-52, Functionality Assessments and Operability Determinations to incorporate industry benchmarking and include: Clarity and accuracy of process actions in an executable step format; the transfer of departmental ownership of the process to Operations; incorporation of the INPO Principles for an Effective Operational Decision Making; an appropriate operability checklist; real-time, in-line expert independent review of PODs and periodic quality checks of IODs; appropriate linkages to other processes (e.g., the Operational Decision Making Process)”	The commitment has been changed as follows: “(CAPR) Revise S0123-XV-52, Functionality Assessments and Operability Determinations to incorporate industry benchmarking and include: Clarity and accuracy of process actions in an executable step format; the transfer of departmental ownership of the process to Operations; incorporation of the INPO Principles for an Effective Operational Decision Making; an appropriate operability checklist; real-time, in-line expert independent review of PODs and periodic quality checks of IODs; appropriate linkages to other processes (e.g., the Operational Decision Making Process)” SCE Management has determined that the POD Real Time in-line review requirement is no longer necessary due to procedure and training enhancements, along with the implementation of the operability determination quality review panel.

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SONGS Tracking Nos.	Source(s)	Proposed Action	Change Summary and Basis for Change
NRCTS 2008-02-019 NN 202135160 SIBP 9.7.2.F	SCE letter to NRC, dated February 2, 2008, Response to Confirmatory Order Item 2 with Corrective Action Plan and Monitoring Program	The following action was stated SCE letter to NRC, dated February 2, 2008. “By April 1, 2008, SCE will incorporate into the SONGS oversight surveillance program, periodic sampling of repetitive rounds and log keeping activities to provide reasonable assurance that actions to deter and detect instances of deliberate non-compliance are effective. This oversight will include sampling of SCE and contractor activities. (CO Item 2.j)”	This action was removed from the surveillance program. The surveillance program has provided reasonable assurance that actions to deter and detect instances of deliberate non-compliance are effective. In addition, in a NRC letter dated 02/10/11, the NRC determined that SCE has satisfied the terms of the Confirmatory Order. Therefore, based on these results and NRC's determination that the terms of the Confirmatory Order have been satisfied, continuation of these surveillances is no longer warranted.