



~~SECURITY-RELATED INFORMATION~~
~~Withhold from Public Disclosure in accordance with 10 CFR 2.390~~
Decontrolled when separated from Security-Related Information

Douglas R. Bauder
Site Vice President & Station Manager
San Onofre Nuclear Generating Station

10 CFR 50.90

March 27, 2013

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

Subject: **Docket Nos. 50-361 and 50-362, License Amendment Requests 262 and 248, to Revise the Fire Protection Licensing Basis to NFPA 805 per 10 CFR 50.48(c), San Onofre Nuclear Generating Station, Units 2 and 3**

Reference: Letter from SCE, Douglas R. Bauder, to NRC Document Control Desk, dated June 24, 2011, Docket Nos. 50-361 and 50-362 Request for Extension of Enforcement Discretion and Commitment to Submittal Date for 10 CFR 50.48(c) License Amendment Request San Onofre Nuclear Generating Station Units 2 and 3

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) hereby submits enclosed License Amendment Requests (LAR) 262 and 248, respectively, for San Onofre Nuclear Generating Station (SONGS) Unit 2, Facility Operating License (FOL) No. NPF-10, and Unit 3, FOL No. NPF-15; SCE Proposed Change Number (PCN)-601.

These LARs request Nuclear Regulatory Commission (NRC) review and approval for adoption of a new fire protection licensing basis which complies with the requirements in 10 CFR 50.48(a) and 10 CFR 50.48(c), and the guidance in Regulatory Guide (RG) 1.205, Revision 1. These LARs are being submitted as scheduled in the referenced letter.

The transition to a new fire protection licensing basis incorporates the National Fire Protection Association Standard 805 (NFPA 805) and includes the following high level activities: a new safe shutdown analysis, a new fire Probabilistic Risk Assessment (PRA), and completion of activities required for transitioning the licensing basis to 10 CFR 50.48(c).

SCE is implementing the Nuclear Energy Institute methodology NEI 04-02, "Guidance for Implementing a Risk-informed, Performance-based Fire Protection Program under 10 CFR 50.48(c)" to transition SONGS from its current fire protection licensing basis to the new requirements, as outlined in NFPA 805.

P.O. Box 128
San Clemente, CA 92672
(949) 368-9275 PAX 89275
Fax: (949) 368-9881
Doug.Bauder@sce.com

~~SECURITY-RELATED INFORMATION~~
~~Withhold from Public Disclosure in accordance with 10 CFR 2.390~~
Decontrolled when separated from Security-Related Information

~~SECURITY-RELATED INFORMATION~~

~~Withhold from Public Disclosure in accordance with 10 CFR 2.390~~

Decontrolled when separated from Security-Related Information

Document Control Desk

-2-

March 27, 2013

Enclosure 2 "Transition to 10 CFR 50.48 (c) – NFPA 805," summarizes the transition process and results. The attachments to the enclosure provide additional supporting information. Attachments Q and R, respectively, conclude that the license amendments do not present any significant hazards and an environmental assessment is not required.

Consistent with Section 5.5 of the enclosed Transition Report (TR), SCE requests an implementation period of 6 months following NRC approval.

Attachment S of the TR contains a list of plant modification commitments and implementation item commitments to support transitioning to the new fire protection license basis. The SONGS NFPA 805 plant modifications will be completed for each of Unit 2 and 3 by end of their respective second scheduled refueling outage after NRC approval of these amendment requests. Appropriate compensatory measures will be maintained until modifications are complete.

A summary of new commitments is provided in Enclosure 1 to this letter.

SCE requests that Attachments C-1, G, and W to Enclosure 2, which contain security-related information, be withheld from public disclosure pursuant to 10 CFR 2.390.

In accordance with 10 CFR 50.91, a copy of this application, without security-related attachments, is being provided to the designated State of California official.

If there are any questions or if additional information is needed, please contact Mark E. Morgan at (949) 368-6745.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3/27/2013
(Date)

Sincerely,



Douglas R. Bauder
Site Vice President and Station Manager

~~SECURITY-RELATED INFORMATION~~

~~Withhold from Public Disclosure in accordance with 10 CFR 2.390~~

Decontrolled when separated from Security-Related Information

~~SECURITY-RELATED INFORMATION~~

~~Withhold from Public Disclosure in accordance with 10 CFR 2.390~~
Decontrolled when separated from Security-Related Information

Document Control Desk

-3-

March 27, 2013

Enclosure 1: Regulatory Commitments

Enclosure 2: San Onofre Nuclear Generating Station Transition Report Dated March, 2013: "Transition to 10 CFR 50.48 (c) – NFPA 805," with Attachments (CD)

Enclosure 3: San Onofre Nuclear Generating Station Transition Report Dated March, 2013: "Transition to 10 CFR 50.48 (c) – NFPA 805," with Attachments (CD) - REDACTED VERSION

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

cc w/o Security-Related Attachments:

S. Y. Hsu, California Department of Public Health, Radiologic Health Branch

~~SECURITY-RELATED INFORMATION~~

~~Withhold from Public Disclosure in accordance with 10 CFR 2.390~~
Decontrolled when separated from Security-Related Information

ENCLOSURE 1

Regulatory Commitments

Enclosure 1

Regulatory Commitments

This table identifies actions discussed in this letter for which Southern California Edison commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are not commitments.

COMMITMENT	TYPE (check one)		SCHEDULED COMPLETION
	ONE-TIME ACTION	SUSTAINABLE ACTION	
Procedure Changes, Process Updates, and Training to Affected Plant Personnel Items 1 through 37 in Table S-3 of Attachment S to Enclosure 2		x	(1)
Modifications and Implementation Items 1 through 15 in Table S-2 of Attachment S to Enclosure 2		x	(2)

(1) Completion 180 days after NRC approval of these license amendment requests.

(2) Completion for each of Unit 2 and 3 by the end of their respective second scheduled refueling outage after NRC approval of these amendment requests.