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 50-362 San Onofre Nuclear Station, Unit 3, Southern California  
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 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

DOCKET #  
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SUBJECT: Comments on 810313 ltr addressing impact of regulatory process on nuclear industry. Will continue to support NRC review activities & will ensure identification & timely submittal of info.

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ROBERT DIETCH  
VICE PRESIDENT

April 3, 1981

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913-572-4144

Director, Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Mr. Denton:

Subject: Docket Nos. 50-361 and 50-362  
San Onofre Nuclear Generating Station  
Units 2 and 3

The purpose of this letter is to respond to your letter of March 13, 1981 to Mr. W. R. Gould. Your letter addressed the impact of the regulatory process on the nuclear industry and identified actions which are being taken by the NRC and should be taken by utilities to reduce future impacts. Those of us associated with the San Onofre Units 2 and 3 project are acutely aware of the cost of regulatory delays based on the fact that since docketing of the Operating License Application this project has experienced licensing-related delays totaling twenty-five months. In just the past year, initial operation of San Onofre Unit 2 has been rescheduled twice, with a total delay of eleven months, because the NRC licensing process was significantly behind construction progress.

Your letter indicates that in order for the NRC Staff to issue Safety Evaluation Reports (SERs) and supplements thereto: (1) all information required by the NRC Staff must be provided two weeks prior to the due date for NRC Staff technical input and (2) applicant representatives should be available in Bethesda during the two weeks immediately preceding the deadline for NRC Staff technical input. Your letter further suggests that Mr. Gould's personal attention and commitment to this matter are necessary.

Let me assure you that actions required of Southern California Edison Company (SCE) and the NRC to provide timely licensing of San Onofre Units 2 and 3 have been and will continue to be the subject of the personal attention of Mr. Gould, myself and other Officers and management of the Corporation. As a corporation, we have been and will continue to be committed to the expeditious licensing of San Onofre Units 2 and 3 consistent with our responsibility for providing an abundant and safe supply of electrical energy to our customers. This commitment is very obvious from many of our activities over the past several months in aggressively pursuing the completion of NRC Staff and ACRS review of our application for operating licenses for San Onofre Units 2 and 3. In addition to numerous meetings with the NRC Staff and its consultants on individual issues, two week-long series of meetings with essentially all NRC technical review branches to surface, answer and resolve NRC Staff questions were conducted in August and December of 1980. Key SCE personnel, as well as representatives of our NSSS supplier and Architect-Engineer/Constructor, were located in Bethesda during the three weeks preceding the completion of the San Onofre Units 2 and 3 SER and the week

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Mr. Denton

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April 3, 1981

**SCE**

preceding the completion of the SER Supplement. During the first quarter of 1981 alone, SCE has supported twenty-one meetings with the NRC, four ACRS subcommittee meetings and two ACRS full committee meetings by the expenditure of more than 400 man-days in Bethesda and Washington, D.C. Resolution of NRC questions through these meetings has been documented in approximately ten formal submittals during the first quarter of 1981.

SCE will, of course, continue to support NRC review activities such as those related to issuance of the May 8, 1981 SER Supplement with this same level of effort. Toward that end, representatives of my staff are in daily contact with the NRC Project Manager for San Onofre Units 2 and 3 to ensure the identification and timely submittal of information needed to support completion of NRC Staff review.

Enclosure 2 of your letter lists licensing and construction schedule data for several near-term operating license applicants. The enclosure, as well as Mr. Kammerer's February 27, 1981 letter to Representative Bevill forwarding the fourth monthly status report of impacted plants, inaccurately identifies the construction completion dates for San Onofre. The correct estimate for completion of construction for Unit 2 at the time of issuance of those documents was June, 1981. However, it is misleading to compare such an estimate for construction completion and licensing issuance to determine the overall impact of regulatory delay on a given project. When it is evident that the licensing schedule is limiting for a given project, prudent management practice dictates that the utility alter the construction schedule to be consistent with the licensing schedule. Therefore, the twenty-five month aggregate licensing delay discussed above provides the best measure of regulatory impact on San Onofre Units 2 and 3. Since the time of my March 20, 1981 letter to Representative Bevill (copy to you) continued assessment of the prospect for licensing completion dictated construction management which will now lead to completion of construction in July, 1981. The difference between this July, 1981 estimate for construction completion and licensing issuance provides the best measure of probable future impact.

Please note that Mr. Gould's current title is Chairman of the Board. If you have any questions related to SCE support of the licensing process, please contact me.

Sincerely,

