



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 30, 2014

Mr. Thomas J. Palmisano
Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 –
RESCISSION OF ORDER EA-12-049, "ORDER MODIFYING LICENSES WITH
REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND
DESIGN BASIS EXTERNAL EVENTS" (TAC NOS. MF2657 AND MF2658)

Dear Mr. Palmisano:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A735), the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049 to Southern California Edison Company (SCE or the licensee), requiring certain actions at San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 associated with the Fukushima Near-Term Task Force Recommendations. Order EA-12-049 directed licensees to develop and implement strategies to maintain or restore core cooling, containment cooling, and spent fuel pool (SFP) cooling capabilities during beyond-design-basis external events.

Section IV of Order EA-12-049 required that SCE submit an overall integrated plan by February 28, 2013, describing how SONGS Units 2 and 3 planned to achieve compliance with the requirements of the Order. SCE responded to the Order by letter dated February 27, 2013 (ADAMS Accession No. ML13066A039).

Section IV of the Order also provided the NRC's Director of the Office of Nuclear Reactor Regulation the authority to relax or rescind any or all of the conditions of the Order upon demonstration by the licensee of good cause.

By letter dated June 12, 2013 (ADAMS Accession No. ML131640201), SCE submitted a certification to the NRC indicating it had permanently ceased power operations at SONGS Units 2 and 3, effective June 7, 2013. By letter dated June 28, 2013 (ADAMS Accession No. ML13183A391) SCE certified that it had permanently defueled Unit 3 on October 5, 2012. By letter dated July 22, 2013 (ADAMS Accession No. ML13204A304), SCE certified that it had permanently defueled Unit 2 on July 18, 2013.

On August 26, 2013, SCE requested relaxation of Order EA-12-049 for SONGS Units 2 and 3 in light of the permanently defueled status of the plant (ADAMS Accession No. ML13240A130).

On September 30, 2013, SCE requested rescission of Order EA-12-049 (ADAMS Accession No. ML13276A019). In this letter, SCE provided the following information to demonstrate good cause for the rescission of Order EA-12-049:

- Guidance and strategies to maintain or restore core cooling and containment are no longer necessary at SONGS because the nuclear fuel has been permanently removed from the SONGS Units 2 and 3 reactor vessels and containments. The reactor coolant system and secondary coolant systems have been removed from service. All nuclear fuel at SONGS is in the Units 2 and 3 SFPs or the Independent Spent Fuel Storage Installation.
- As of September 30, 2013, the time to boil in each SFP is approximately 90 hours and the time to reduce SFP water inventory to a point 10 feet above the top of the spent fuel racks is an additional approximate 11 days.

The NRC staff reviewed the licensee's statements, and concludes that the lack of fuel in the core and the absence of challenges to the containment render the development of guidance and strategies to maintain or restore core cooling and containment capabilities unnecessary.

The NRC staff also reviewed the licensee's statements with regard to decay heat levels, and determined that by the time implementation of the order is required (December 31, 2016), the time to boil off water inventory in the SFP to a level of 10 feet above the spent fuel will be sufficiently long to obviate the need for additional strategies to restore SFP cooling. The NRC staff concludes that given the low decay heat levels and the long time to boil off, the reliance on the SFP inventory for passive cooling provides an equivalent level of protection as that which would be provided by the initial phase of the guidance and strategies for maintaining or restoring SFP cooling capabilities that would be necessary for compliance with Order EA-12-049 using installed equipment. The staff further concludes that the long time to boil off the SFP inventory to a point at which makeup would be necessary for radiation shielding purposes obviates the need for the transition phase of the guidance and strategies that would be necessary for compliance with Order EA-12-049 using on-site portable equipment. The staff also concludes that the low decay heat and long boil-off period provides sufficient time for the licensee to obtain off-site resources on an ad hoc basis to sustain the SFP cooling function indefinitely, obviating the need for the final phase of the guidance and strategies that would be necessary for compliance with Order EA-12-049.

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Therefore, for the reasons discussed above, the NRC staff concludes that good cause has been demonstrated to rescind the Order. All other regulatory requirements for which rescission was not specifically requested remain applicable and are not impacted by rescission of this Order. Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, Order EA-12-049 is rescinded in its entirety for SONGS Units 2 and 3.

Sincerely,

A handwritten signature in black ink that reads "Eric J. Leeds for E.L." The signature is written in a cursive style.

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

cc: ListServ

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Therefore, for the reasons discussed above, the NRC staff concludes that good cause has been demonstrated to rescind the Order. All other regulatory requirements for which rescission was not specifically requested remain applicable and are not impacted by rescission of this Order. Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, Order EA-12-049 is rescinded in its entirety for SONGS Units 2 and 3.

Sincerely,

/RA/

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

cc: ListServ

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