

10 CFR 50.90

May 16, 2017

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

Subject: **Docket No. 50-361 and 50-362
Amendment Applications 275 and 260
Proposed Changes to Cyber Security Plan
Implementation Schedule Completion Date
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 license amendment application 275 to operating license NPF-10 for San Onofre Nuclear Generating Station (SONGS) Unit 2 and license amendment 260 to operating license NPF-15 for SONGS Unit 3. These License Amendment Requests consist of Proposed Change Number (PCN)-614.

PCN-614 proposes to delete the Cyber Security Plan from License Condition 2.E. The Enclosure provides an evaluation of the proposed amendment. Attachment 1 to the Enclosure contains the proposed mark-up for the requested changes to Paragraph 2.E of Facility Operating License Nos. NPF-10 and NPF-15 (Units 2 and 3, respectively). Attachment 2 to the Enclosure contains the proposed clean-typed Facility Operating License pages.

SCE has determined that there is no significant hazard consideration associated with the proposed change and that the change is exempt from environmental review pursuant to 10 CFR 51.22(c)(12).

SCE requests a decision on these amendment applications by October 31, 2017, in order to stop work on plan activities that are no longer necessary.

In accordance with 10 CFR 50.91(b), SCE is notifying the State of California of this request for license amendment by providing a copy of this letter and its enclosures.

There are no new regulatory commitments in this letter or the Enclosure.

Should you have any questions, or require additional information, please contact Mr. Mark Morgan at (949) 368-6745.

SODIA
NRR

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

Executed on May 16, 2017

Sincerely,

A handwritten signature in black ink, appearing to read "Thuy PL", written in a cursive style.

Enclosures:

PCN-614 with Attachments

cc: K. Kennedy, Regional Administrator, NRC Region IV
M. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3
R. K. Lupo, California Department of Public Health, Radiologic Health Branch

ENCLOSURE

Evaluation of the Proposed Amendment

PCN-614

License Amendment Request (LAR) for Deletion of the Cyber Security Plan

1.0 Summary Description

2.0 Detailed Description

3.0 Technical Evaluation

3.1 Introduction

3.2 Justification

4.0 Regulatory Evaluation

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Attachments:

1. Proposed Facility Operating License Mark-up Pages
2. Proposed Facility Operating License Clean-Typed Pages

1.0 SUMMARY DESCRIPTION

The proposed license amendment request for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 revises License Condition 2.E to remove reference to the Cyber Security Plan. This will allow Southern California Edison (SCE) to terminate the SONGS Cyber Security Plan and associated activities at the site. This proposed change is based on the lowered risk profile of the station due to the permanently defueled status of the plant and the continued radioactive decay of the remaining spent fuel.

The details of the proposed action and our evaluation are presented below.

2.0 DETAILED DESCRIPTION

10 CFR 73.54 requires that as of November 23, 2009, each licensee currently licensed to operate a nuclear power plant under part 50 submit a cyber security plan for Commission review and approval. By letter dated July 28, 2011 (Reference 1), the NRC approved SCE's cyber security plan submitted in accordance with 10 CFR 73.54. The amendment revised license condition 2.E for both Units to require SCE to implement and maintain the Cyber Security Plan.

Because a permanently shutdown and defueled unit is no longer authorized to operate the reactor in accordance with 10 CFR 50.82, the regulations in 10 CFR 73.54 no longer apply. Such plants are still required to comply, however, with the license condition to maintain a cyber security plan until such time as the license condition is modified to remove the requirements. This proposed change therefore requests modification of license condition 2.E for SONGS Units 2 and 3 to delete the requirement to implement and maintain a Cyber Security Plan.

3.0 TECHNICAL EVALUATION

3.1 Introduction

3.1.1 SONGS current status

SONGS Unit 1 permanently ceased operations in 1992 and is in the decommissioning phase. Above-ground structures have been dismantled. Unit 1 fuel is stored in the SONGS Transnuclear Independent Spent Fuel Storage Installation (ISFSI) and in the GE-Hitachi Morris facility. There is no requirement for a Cyber Security Plan in the Unit 1 license.

SCE submitted certifications that SONGS Units 2 and 3 permanently ceased operations on June 12, 2013 (Reference 2), and submitted certifications that the Units have been permanently defueled on June 28, 2013 (Reference 3) and July 22, 2013 (Reference 4). In accordance with 10 CFR 50.82(a)(2), the operating licenses for these two units no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel. Neither unit has operated since January 2012. Units 2 and 3 spent fuel is stored in the Units 2 and 3 spent fuel pools and the SONGS Transnuclear ISFSI. Spent fuel stored in the Units 2 and 3 spent fuel pools has been decaying since at least January 2012 and is expected to be transferred to the Holtec ISFSI beginning later this year and finishing in 2018.

3.1.2 Cyber Security Regulatory Framework for Permanently Shutdown Plants

The current cyber security requirements for power reactors are set forth in 10 CFR 73.54, "Protection of digital computer and communication systems and networks." The preamble to 10 CFR 73.54 states in part that by November 23, 2009, each reactor licensee "currently licensed to operate" must, in accordance with 10 CFR 50.90, submit to the NRC a cyber security plan for review and approval. Following the submittal of the certifications of permanent removal of fuel from the reactors described in section 3.1.1 above, SONGS Units 2 and 3 are no longer authorized to operate, and therefore are outside the scope of 10 CFR 73.54. In spite of this, a Cyber Security Plan is still required at SONGS because the Cyber Security Plan is described in the Physical Security Plan License Condition for Units 2 and 3. Approval of this request would eliminate the Cyber Security Plan requirement from License Condition 2.E for Units 2 and 3, allowing for discontinuation of the Cyber Security Plan activities at SONGS.

Following removal of spent fuel from the reactor, the principal radiological risks are associated with the storage of spent fuel onsite. Generally, a few months after the reactor has been permanently shut down, there are no possible design-basis events that could result in a radiological release exceeding the limits established by the U.S. Environmental Protection Agency (EPA) early-phase Protective Action Guides (PAGs) of 1 man-rem at the exclusion area boundary. The only accident that might lead to a significant radiological release at a decommissioning reactor is a zirconium fire. The zirconium fire scenario is a postulated, but highly unlikely, beyond-design-basis accident scenario that involves a major loss of water inventory from the SFP, resulting in a significant heat-up of the spent fuel, and culminating in substantial zirconium cladding oxidation and fuel damage. The significance of spent fuel heat-up scenarios that might result in a zirconium fire depends on the decay heat of the irradiated fuel stored in the SFP. Therefore, the probability of a zirconium fire scenario continues to decrease as a function of the time that the decommissioning reactor has been permanently shut down. The NRC has applied a threshold for various decommissioning licensing actions of a 10-hour heatup time under adiabatic conditions prior to reaching a clad ignition temperature.

In its Draft Regulatory Basis Document for Regulatory Improvements for Power Reactors Transitioning to Decommissioning (March 31, 2017, ADAMS Accession No. ML17047A413), the NRC stated that until all spent fuel in the SFP is sufficiently decayed such that a spent fuel fire is highly unlikely (i.e., the 10-hour threshold is met), reactor licensees should be required to maintain reasonable assurance that their critical digital assets remain protected against cyber attacks. Once spent fuel at a site has sufficiently decayed, there are no applicable design-basis events that could result in an offsite radiological release exceeding the limits established by the EPA PAGs of 1 rem at the exclusion area boundary. In addition, sufficient time would exist to take prompt mitigative actions in response to a postulated zirconium fire accident scenario in the SFP. At such time, maintaining protection of Cyber Security critical digital assets is no longer necessary.

3.1.3 SONGS Spent Fuel Pool Status

The spent fuel in the SONGS Units 2 and 3 spent fuel pool has been decaying since at least January of 2012. As a result, the risk of events related to spent fuel storage has decreased such that protection of Cyber Security critical digital assets is no longer necessary.

As part of its request for approval of the Permanently Defueled Emergency Plan (Reference 5), SCE provided the following justification: (1) demonstrating no Design Basis Accident could have radiological consequences which exceed EPA Protective Action Guidelines; and (2) that a zirconium fire would be highly unlikely. The zirconium fire likelihood was supported by two analyses. The first analysis demonstrated >10 hours before stored fuel could reach a peak clad temperature of 900°C in the limiting stored fuel assembly with no water present in the pool and no air cooling. SCE demonstrated >10 hours under adiabatic conditions at the time Reference 5 was submitted. Based on that information, and given the additional decay time, there is now > 31 hours before mitigating action would be required (Reference 6). The NRC reviewed a summary of the SCE analyses and performed confirmatory calculations using the same conservative inputs and concluded that sufficient time existed to mitigate a spent fuel pool draindown in the adiabatic case (Reference 7). The second analysis, provided as an response to a Request for Additional Information (Reference 8), showed that as of August 31, 2014, in the case of a complete loss of spent fuel pool water inventory where adequate fuel handling building air exchange with the environment, air cooling of the spent fuel assemblies would be sufficient to keep the fuel within a safe temperature range, indefinitely, without fuel cladding damage or offsite radiological release.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements and Criteria

10 CFR 73.54 requires licensees to maintain and implement a cyber security plan. San Onofre Nuclear Generating Station (SONGS), Units 2 and 3 Facility Operating Licenses include a physical protection license condition (Paragraph 2.E of the Facility Operating License Nos. NPF-10 and NPF-15) that requires Southern California Edison (SCE) to fully implement and maintain in effect all provisions of the Commission-approved cyber security plan. Based on the permanently shutdown and defueled status of SONGS, and the decay time of the fuel remaining in the Units 2 and 3 spent fuel pools, SCE is proposing to remove the Cyber Security Plan requirement from License Condition 2.E of the Units 2 and 3 Operating Licenses.

4.2 No Significant Hazards Consideration

Southern California Edison (SCE) has evaluated whether or not a significant hazards consideration exists with the proposed change by addressing the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change to remove the San Onofre Nuclear Generating Station (SONGS) Cyber Security Plan requirement does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components (SSCs) relied upon to mitigate the consequences of postulated accidents, and has no impact on the probability or consequences of an accident previously evaluated.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change to remove the SONGS Cyber Security Plan requirement does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the SSCs relied upon to mitigate the consequences of postulated accidents, and does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

Plant safety margins are established through limiting conditions for operation, limiting safety system settings, and safety limits specified in the technical specifications. The proposed change to the SONGS Cyber Security Plan does not change these established safety margins. Therefore the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluations, SCE concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c). Accordingly, a finding of "no significant hazards consideration" is justified.

4.3 Conclusion

In conclusion, based on the considerations discussed above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed license amendment requires no environmental assessment provided that (i) the license amendment involves no significant hazards consideration, (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite,

and (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

SCE has reviewed the proposed change and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22, no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the proposed license amendment. The following is the basis for this determination:

- (i) The amendment applications do not involve a significant hazards consideration, as described in the Significant Hazards Evaluation in Section 4.2 above.
- (ii) There will be no significant change in the types or a significant increase in the amounts of any effluents released offsite. There will be no significant change in the types or increase in the amounts of any effluents that may be released offsite and the proposed license amendment does not involve irreversible environmental consequences beyond those already associated with the SONGS Final Environmental Statement and the Generic EIS on Decommissioning of Nuclear Facilities (NUREG-0586, Supplement 1, 2002).
- (iii) The amendment applications do not result in a significant increase to the individual or cumulative occupational radiation exposure because the proposed change involves removal of the Cyber Security Plan requirement, which is of administrative nature with no significant impact on occupational radiation exposure. Therefore, the amendment applications do not result in a significant increase to the individual or cumulative occupational radiation exposure.

6.0 REFERENCES

1. Letter from J. R. Hall, (NRC), to Peter T. Dietrich (SCE), "San Onofre Nuclear Generating Station, Units 2 and 3 – Issuance of Amendments RE: Approval of Cyber Security Plan (TAC Nos. ME4426 and ME4427)," dated July 28, 2011 (ADAMS Accession No. ML111960323).
2. Letter from P. T. Dietrich (SCE) to Document Control Desk (NRC), "Docket Nos. 50-361 and 50-362, Certification of Permanent Cessation of Power Operations, San Onofre Nuclear Generating Station, Units 2 and 3," dated June 12, 2013 (ADAMS Accession No. ML131640201).
3. Letter from P. T. Dietrich (SCE) to Document Control Desk (NRC), dated June 28, 2013; Subject: Docket No. 50-362, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 3 (ADAMS Accession No. ML13183A391)
4. Letter from P. T. Dietrich (SCE) to Document Control Desk (NRC) dated July 22, 2013; Subject: Docket No. 50-361, Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station, Unit 2 (ADAMS Accession Number ML13204A304)
5. Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated March 31, 2014; Subject: Docket Nos. 50-206, 50-361, 50-362, and 72-041, Emergency Planning Exemption

Request, San Onofre Nuclear Generating Station, Units 1, 2, and 3 and Independent Spent Fuel Storage Installation (ADAMS Accession No. ML14092A332)

6. Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated October 6, 2014; Subject: Docket Nos. 50-206, 50-361, 50-362, and 72-041, Response to Request for Additional Information, Proposed Exemptions from Certain Portions of 10 CFR 50.47 and Appendix E (Publicly available version submitted December 15, 2014, ADAMS Accession No. ML14351A078)
7. Letter from T. J. Wengert (NRC) to A. L. Sterdis (SCE) dated June 4, 2015; Subject: Docket San Onofre Nuclear Generating Station, Units 1, 2, 3 and ISFSI, Exemptions from Emergency Planning Requirements and Related Safety Evaluation (ADAMS Accession No. ML15082A143).
8. Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated September 9, 2014; Subject: Docket Nos. 50-206, 50-361, 50-362, and 72-041, Response to Request for Additional Information Regarding Emergency Planning Exemption Request, San Onofre Nuclear Generating Station, Units 1, 2, 3, and ISFSI (ADAMS Accession No. ML14258A003)

ATTACHMENT 1

Proposed Facility Operating License Mark-Up Pages

Unit 2 Facility Operating License Page

- E. SCE shall fully implement and maintain in effect all provisions of the Commission- approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 2" submitted by letter dated May 15, 2006. ~~SCE shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The SONGS CSP was approved by License Amendment No. 225 as supplemented by changes approved by License Amendments 231 and 234.~~

Pursuant to NRC's Order EA-13-092, dated June 5, 2013, NRC reviewed and approved the license amendment 232 that permitted the security personnel of the licensee to possess and use certain specific firearms, ammunition, and other devices, such as large-capacity ammunition feeding devices, notwithstanding local, State, and certain Federal firearms laws that may prohibit such possession and use.

- F. This license is subject to the following additional condition for the protection of the environment:

Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

- G. DELETED

- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

- J. Deleted

*On September 29, 1983, the Safeguards Contingency Plan was made a separate, companion document to the Physical Security Plan pursuant to the authority of 10 CFR 50.54.

Unit 3 Facility Operating License Page

Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 2" submitted by letter dated May 15, 2006. ~~SCE shall fully implement and maintain in effect all provisions of the Commission-approved cyber-security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The SONGS CSP was approved by License Amendment No. 218, as supplemented by changes approved by License Amendments 224 and 227.~~

Pursuant to NRC's Order EA-13-092, dated June 5, 2013, NRC reviewed and approved the license amendment 225 that permitted the security personnel of the licensee to possess and use certain specific firearms, ammunition, and other devices, such as large-capacity ammunition feeding devices, notwithstanding local, State, and certain Federal firearms laws that may prohibit such possession and use.

- F. This license is subject to the following additional condition for the protection of the environment:
- Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.
- G. DELETED
- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

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ATTACHMENT 2

Proposed Facility Operating License Clean-Typed Pages

Unit 2 Facility Operating License Page

- E. SCE shall fully implement and maintain in effect all provisions of the Commission- approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 2" submitted by letter dated May 15, 2006.

Pursuant to NRC's Order EA-13-092, dated June 5, 2013, NRC reviewed and approved the license amendment 232 that permitted the security personnel of the licensee to possess and use certain specific firearms, ammunition, and other devices, such as large-capacity ammunition feeding devices, notwithstanding local, State, and certain Federal firearms laws that may prohibit such possession and use.

- F. This license is subject to the following additional condition for the protection of the environment:

Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

- G. DELETED

- H. SCE shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

- I. SCE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

- J. Deleted

*On September 29, 1983, the Safeguards Contingency Plan was made a separate, companion document to the Physical Security Plan pursuant to the authority of 10 CFR 50.54.

Unit 3 Facility Operating License Page

Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.

- E. SCE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21 is entitled: "San Onofre Nuclear Generating Station Security, Training and Qualification, and Safeguards Contingency Plan, Revision 2" submitted by letter dated May 15, 2006.

Pursuant to NRC's Order EA-13-092, dated June 5, 2013, NRC reviewed and approved the license amendment 225 that permitted the security personnel of the licensee to possess and use certain specific firearms, ammunition, and other devices, such as large-capacity ammunition feeding devices, notwithstanding local, State, and certain Federal firearms laws that may prohibit such possession and use.

- F. This license is subject to the following additional condition for the protection of the environment:

Before engaging in activities that may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement, SCE shall provide a written notification of such activities to the NRC Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

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