

**ENCLOSURE**

**RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
SONGS-RAI-1 and -2**

**CHANGES TO THE EMERGENCY PLAN AND EMERGENCY ACTION  
LEVEL SCHEME TO REFLECT AN ISFSI-ONLY CONFIGURATION**

**SOUTHERN CALIFORNIA EDISON  
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 1, 2 AND 3  
DOCKET NOS. 50-206, 50-361, AND 50-362**

## **SONGS-RAI-1**

The current EAL PD-HA1 contains the following language, which is consistent with the NRC-endorsed guidance of the Nuclear Energy Institute (NEI) document NEI 99-01, "Development of Emergency Action Levels for Non-Passive Reactors" (ADAMS Accession Number ML12326A805):

Timely and accurate communications between SSS [Nuclear Security Shift Supervisor] and the ISS [Control Room] is essential for proper classification of a security-related event.

However, the proposed EAL PD-HA1 for the IOEAL removed this language from the basis.

Please revise EAL PD-HA1 to include this statement to be consistent with NRC-endorsed guidance, or provide a justification to deviating from the endorsed guidance.

### **SCE Response:**

The language is being added to IOEP-2, IC PD-HA1 Basis, and will read as follows:

"Timely and accurate communications between SSS and the ISS is essential for proper classification of a security-related event."

The proposed SONGS ISFSI Only EAL Technical Bases Manual has been revised in response to the staff's question and is provided in the changes to the ISFSI Only EAL Technical Bases Manual.

## **SONGS-RAI-2**

The proposed EAL PD-HA1 and EAL PD-HU1 have the following language removed from the basis that is in the current EAL PD-HA1 and EAL PD-HU1:

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the Security Plan.

Since this language remains consistent with NRC-endorsed guidance for an ISFSI-only EALs, please revise EAL PD-HA1 and EAL PD-HU1 to include this language, or provide justification for its removal since eliminating this language could result in the unintentional disclosure of security-sensitive information.

### **SCE Response:**

Upon further review, SCE agrees with the NRC that the language removed from the current EALs PD-HA1 and PD-HU1 concerning Security-sensitive information should remain in the proposed EALs PD-HA1 and PD-HU1 bases. The language is being added to IOEP-2, IC PD-HA1 Basis and IC PD-HU1 Basis, and will read as follows:

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the Security Plan.

The proposed SONGS ISFSI Only EAL Technical Bases Manual has been revised in response to the staff's question and is provided in the changes to the ISFSI Only EAL Technical Bases Manual.

**CHANGES TO**

**SAN ONOFRE NUCLEAR GENERATING STATION (SONGS)**  
**INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)**  
**ONLY EMERGENCY PLAN EMERGENCY ACTION LEVEL**  
**TECHNICAL BASES MANUAL**

## 4.0 EAL TECHNICAL BASES

### 4.1 PD-HA1

#### **Initiating Condition:**

HOSTILE ACTION within the VBS boundary.

#### **EAL:**

PD-HA1.1. A HOSTILE ACTION is occurring or has occurred within the VBS boundary as reported by the Security Shift Supervisor.

#### **Basis:**

This IC addresses the occurrence of a HOSTILE ACTION within the VBS boundary. This event will require rapid response and assistance due to the possibility of the attack progressing to the ISFSI PROTECTED AREA.

Timely and accurate communications between SSS and the ISS is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program].

As time and conditions allow, these events require a heightened state of readiness by the staff and implementation of onsite protective measures (e.g., evacuation, dispersal or sheltering). The ALERT declaration will also heighten the awareness of Offsite Response Organizations, allowing them to be better prepared should it be necessary to consider further actions.

This IC does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc.

Reporting of these types of events is adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

EAL #1 is applicable for any HOSTILE ACTION occurring, or that has occurred, within the VBS boundary. This includes any action directed against the ISFSI that is located within the VBS boundary.

In some cases, it may not be readily apparent if an aircraft impact within the VBS boundary was intentional (i.e., a HOSTILE ACTION). It is expected, although not certain, that notification by an appropriate Federal agency to the site would clarify this point. In this case, the appropriate federal agency is intended to be NORAD, FBI, FAA or NRC. The emergency declaration, including one based on other ICs/EALs, should not be unduly delayed while awaiting notification by a Federal agency.

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security sensitive information should be contained in non-public documents such as the Security Plan.

None.

#### **Basis Reference:**

1. NEI 99-01 Rev 6, PD-HA1

4.2 **PD-HU1****Initiating Condition:**

Confirmed SECURITY CONDITION or threat.

**EALs:**

PD-HU1.1. A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the Security Shift Supervisor.

PD-HU1.2. Notification of a credible security threat directed at the site.

**Basis:**

This IC addresses events that pose a threat to station personnel or the spent fuel, and thus represent a potential degradation in the level of station safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under IC PD-HA1.

Timely and accurate communications between SSS and the ISS is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to station personnel and Offsite Response Organizations. Security plans and terminology are based on the guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program].

EAL #1 references Security Shift Supervisor because these are the individuals trained to confirm that a security event is occurring or has occurred. Training on security event confirmation and classification is controlled due to the nature of Safeguards and 10 CFR § 2.390 information.

EAL #2 addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with Security procedures. Credible security threat includes a HOSTILE ACTION within the SITE BOUNDARY outside of the VBS boundary.

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the Security Plan.

Escalation of the ECL would be via IC PD-HA1.

**Additional SONGS Site-Specific Bases Information:**

None.

**Basis Reference:**

1. NEI 99-01 Rev 6, PD-HU1