

November 2, 2017

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: **Docket No. 72-41**
Revision to Response to Order Modifying Licenses
San Onofre Nuclear Generating Station, Units 1, 2, and 3

- References:
- 1) Letter from Martin J. Virgilio (NRC) to Harold B. Ray (SCE) dated October 16, 2002; Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for San Onofre Nuclear Station, Units 1, 2, and 3
 - 2) Letter from D.E. Nunn (SCE) to Document Control Desk (NRC) dated October 31, 2002; Subject: Docket No. 72-41, Response to Order Modifying Licenses, San Onofre Nuclear Generating Station, Units 1, 2, and 3
 - 3) Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated December 19, 2016; Subject: Docket No. 50-361, 50-362, 50-206 and 72-41, Amendment Applications 227, 274, and 259, Independent Spent Fuel Storage Installation (ISFSI) Only Security Plan, San Onofre Nuclear Generating Station, Units 1, 2, and 3

Dear Sir or Madam:

By letter dated October 16, 2002 (Reference 1), the Nuclear Regulatory Commission issued an Order to Southern California Edison (SCE) for the San Onofre Nuclear Generating Station (SONGS). The Order provided Interim Safeguards and Security Compensatory Measures (ICM) for the Independent Spent Fuel Storage Installation (ISFSI) then under construction at SONGS. By letter dated October 31, 2002, SCE responded to the Order stating the compliance with the requirements of Reference 1 would be achieved prior to first moving fuel into the new ISFSI.

Following the permanent cessation of operations at SONGS, SCE has been preparing an expansion to the SONGS ISFSI. Once construction of the ISFSI expansion is complete, SCE plans to move all spent fuel on site from the spent fuel pools to dry storage within the ISFSI in preparation for active decommissioning of the SONGS Units 2 and 3 structures (decommissioning of SONGS Unit 1 has largely been completed). SCE has submitted a proposed change to the SONGS Security Plan (Reference 3) to reflect the reduced security requirements once spent fuel transfer is completed and an ISFSI-only configuration is achieved.

NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS "~~SAFEGUARDS INFORMATION~~." THIS INFORMATION MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION FROM ENCLOSURE 1, THIS LETTER IS "DECONTROLLED."

~~SAFEGUARDS INFORMATION~~

SCE's initial statement of compliance with the ICM order for the SONGS ISFSI was specific to Attachment 2, section C, of the Order, which provides requirements for "Independent Spent Fuel Storage Installations Using Dry Storage Located at an Operating Reactor Facility on the Owner-Controlled Area." Once spent fuel is removed from the SONGS Units 2 and 3 spent fuel pools and the ISFSI-only Security Plan is implemented, the requirements of Attachment 2, Section C of Reference 1 will no longer be applicable to the SONGS ISFSI.

The Enclosure to this letter provides a revised response to Reference 1 demonstrating how SONGS will comply with Attachment 2, Section B, "Independent Spent Fuel Storage Installations (ISFSI) Using Dry Storage that are Not Co-Located at an Operating Reactor Facility," following transition to the SONGS ISFSI-only Security Plan.

SCE will continue to comply with Attachment 2, Section C requirements of Reference 1 until implementation of the SONGS ISFSI-only Security Plan.

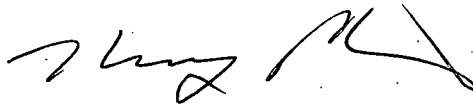
There are no new regulatory commitments in this letter or the enclosures.

Please contact Mr. Al Bates at (949) 368-6945 if you have any questions regarding this submittal or require additional information.

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

Executed on 11/2/2017

Sincerely,

A handwritten signature in black ink, appearing to be "Al Bates", written in a cursive style.

Enclosure 1: SONGS ISFSI Only Updated Response to Interim Compensatory Measures for Dry Independent Spent Fuel Storage Installations Not Collocated at an Operating Power Reactor Facility

cc: K. Kennedy, Regional Administrator, NRC Region IV (w/o enclosures)
M. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3 (w/o enclosures)
W. C. Allen, NRC Project Manager, SONGS ISFSI (w/o enclosures)

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~~SAFEGUARDS INFORMATION~~

ENCLOSURE 1

SONGS ISFSI Only Updated Response to Interim Compensatory Measures for Dry Independent Spent Fuel Storage Installations Not Collocated at an Operating Power Reactor Facility

WARNING:
Violation of § 147 of the Atomic Energy Act, "Safeguards Information," is subject to Civil and Criminal Penalties.

Safeguards Information
Determination made by:
Name / Title: Dave Piper / Technical Specialist
Organization / Date: Security / 10/25/17
Basis: 10 CFR 73.22

NOTE: ENCLOSURE 1 CONTAIN "~~SAFEGUARDS INFORMATION.~~" THIS INFORMATION MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION FROM ENCLOSURE 1, THIS COVER PAGE IS "DECONTROLLED."