



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

June 27, 2019

Mr. Doug Bauder
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 1, 2, AND 3 AND
THE INDEPENDENT SPENT FUEL STORAGE INSTALLATION – REVIEW OF
COMMITMENT CHANGES AS A RESULT OF DECOMMISSIONING**

Dear Mr. Bauder:

The U.S. Nuclear Regulatory Commission (NRC) has conducted a review of the changes to the regulatory commitments for the San Onofre Nuclear Generating Station (SONGS), Units 1, 2, and 3, and the independent spent fuel storage installation (ISFSI), as described in your letter dated June 4, 2109 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML19158A092). A portion of the letter provides a report of the commitment changes made by Southern California Edison (SCE, the licensee) following the guidance of Nuclear Energy Institute (NEI) 99-04, "Guidance for Managing NRC Commitment Changes," Revision 0, for the reporting period of April 1, 2017, through April 1, 2019.

Specifically, Enclosure 2 of the June 4, 2019, letter includes a list of the commitments that the licensee identified using the NEI 99-04 process as commitment changes that should be included in the NRC summary report. SCE states that the 334 commitments identified in Enclosure 2 are no longer applicable due to SONGS being in a permanently shutdown and decommissioning condition. Enclosure 3 of the June 4, 2019, letter provides a list of the 26 commitments that SCE had identified as being still applicable to SONGS as of April 1, 2019. SCE also states that SONGS continues to comply with these 26 commitments.

The NRC staff has completed a review of the SCE commitment changes and determined that the 334 commitments identified as being no longer applicable to the plant are appropriate due to SONGS, Units 1, 2, and 3, being in a decommissioning status. The majority of these commitments were either already completed by the licensee prior to permanent shutdown in June 2013, or (1) pertained to structures, systems, and components (SSCs) that are no longer considered safety related because the plant has been permanently shutdown and defueled, (2) were applicable only during refueling outages or other plant evolutions that will no longer be performed during decommissioning, or (3) pertain to plant programs that have been significantly changed as a result of the current plant status (e.g., the Emergency Plan).

In addition, the 26 commitments identified by SCE as being still applicable to SONGS, Units 1, 2, and 3, and the ISFSI, are appropriate because they pertain to SSCs, activities, and programs that will remain in effect during the current phase of the decommissioning process. Although the majority of these commitments have already been completed by the licensee, maintaining a

record of these items in the SCE commitment management program will ensure that the intent of each commitment is retained throughout the SONGS decommissioning process. As such, the NRC staff concludes that the SONGS commitment changes, as described in the June 4, 2019, letter, follow the NRC-approved guidance described in NEI-99-04 and are, therefore, acceptable.

If you have any questions regarding this matter, please contact me at (301) 415-3178 or via e-mail at marlayna.doell@nrc.gov.

Sincerely,

/RA/

Marlayna Vaaler Doell, Project Manager
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 50-206, 50-361, 50-362,
and 72-041

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