

October 16, 1998

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Updated Final Safety Analysis Report
San Onofre Nuclear Generating Station Units 2 and 3

The purpose of this letter is to inform you of the voluntary initiative of Southern California Edison's (SCE) to further enhance the accuracy and completeness of the information in the Updated Final Safety Analysis Report (UFSAR) for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3.

To date, SCE has expended over 50,000 manhours in support of a comprehensive review of the accuracy of the UFSAR. As noted in our letter of July 31, 1997, this review was extended through October 1998 to incorporate the results of other ongoing programs and to allow for additional quality verification of the UFSAR effort.

Additionally, SCE is participating with the Nuclear Energy Institute (NEI) in the development of guidelines for updating the UFSAR. These guidelines are the subject of ongoing discussions between NEI and the Nuclear Regulatory Commission (NRC), and it is anticipated that agreement can be reached such that the NRC will be able to endorse the NEI guidelines.

In parallel, and based on the results of reviews performed over the past year, SCE is extending its UFSAR validation program. The next phase of the ongoing program is already underway and involves benchmarking and improving the processes for updating of the UFSAR.

Following completion of this effort, SCE will be performing a further review to ensure completeness in light of the then existing interpretations of 10 CFR 50.71(e). Based upon the results of these reviews, SCE will modify future updates of the UFSAR as required.

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In addition, SCE will be performing reviews to improve the accuracy of the UFSAR. These additional reviews will be based in part on the risk significance of the systems as well as the results of selected program audits. Based on the results of these reviews, SCE will document any discrepancies identified, evaluate the reportability of any findings, and update the UFSAR as necessary.

These initiatives are currently scheduled to be completed over an extended period of time but we currently anticipate completion within the time frames outlined in Enforcement Guidance Memorandum 98-007. We will continue to advise the staff as our scope and schedules evolve.

If you would like additional information on our review efforts, please feel free to contact me or Mr. J. Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to read "J. A. Sloan". The signature is fluid and cursive, with a large initial "J" and "S".

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
J. W. Clifford, NRC Project Manager, San Onofre Units 2 and 3