



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

March 24, 2022

EA-21-177

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 – NOTICE OF VIOLATION;  
NRC INSPECTION REPORT 05000206/2021402, 05000361/2021402,  
05000362/2021402, AND 07200041/2021401; AND INVESTIGATION  
REPORT 4-2021-004

Dear Mr. Bauder:

This letter refers to the investigation completed on November 9, 2021, by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations at the San Onofre Nuclear Generating Station. The purpose of the investigation was to determine whether an individual willfully failed to follow security requirements. Based on the results of the investigation, the NRC did not substantiate that a willful action occurred, however a subsequent review of the issue identified an apparent violation. The inspection report, which documents our in-office review of the issue and includes our understanding of your corrective actions, is provided as nonpublic Enclosure 2.

In a telephonic exit briefing on February 17, 2022, my staff informed you that the NRC was considering escalated enforcement for the apparent violation. Because this case involved a legacy compliance issue that was self-identified by your staff, was well understood, had long since been corrected, and did not represent an event where station security was jeopardized, the NRC determined that a predecisional enforcement conference or a written response was not required to make an enforcement decision. In a telephone conversation on February 23, 2022, you indicated that you did not believe that a predecisional enforcement conference or written response was needed and that you accept the violation on behalf of the Southern California Edison Company.

Based on the information acquired during the investigation and our in-office review, the NRC has determined that a violation of NRC requirements occurred. This violation is cited in nonpublic Enclosure 1, "Notice of Violation" (Notice). Enclosure 2 provides the basis for the NRC's conclusion. Therefore, this violation has been categorized in accordance with the NRC Enforcement Policy as escalated enforcement. The NRC Enforcement Policy is available on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

**The enclosures transmitted herewith contains Sensitive Unclassified Non-Safeguards Information (SUNSI). When separated from the enclosures, this transmittal document is decontrolled.**

D. Bauder

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In accordance with the NRC Enforcement Policy, a civil penalty is considered for an escalated enforcement.

Because your facility has not been the subject of escalated enforcement actions within the last 2 years, the NRC considered whether credit was warranted for *Corrective Action* in accordance the NRC Enforcement Policy. The NRC has determined that *Corrective Action* credit is warranted for your prompt and comprehensive corrective actions documented in Enclosure 2.

Therefore, to encourage prompt and comprehensive correction of violations, and in recognition of the absence of previous escalated enforcement action at your facility in the last 2 years, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket in Enclosure 2. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. However, the material enclosed herewith contains Security-Related Information in accordance with 10 CFR 2.390(d)(1), and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material in the enclosures will not be made available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS.

If you have any questions concerning this matter, please contact Mr. Ray Kellar, of my staff, at 817-200-1527.

Sincerely,



Signed by Morris, Scott  
on 03/24/22

Scott A. Morris  
Regional Administrator

Docket Nos. 50-206; 50-361; 50-362; 72-041  
License Nos. DPR-13; NPF-10; NPF-15

Nonpublic Enclosures:

1. Notice of Violation
2. Inspection Report

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D. Bauder

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SAN ONOFRE NUCLEAR GENERATING STATION – NOTICE OF VIOLATION; NRC INSPECTION REPORT 05000206/2021402, 05000361/2021402, 05000362/2021402, AND 07200041/2021401; AND INVESTIGATION REPORT 4-2021-004 - DATED MARCH 24, 2022

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