

November 30, 2001

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

SUBJECT: **Docket Nos. 50-361 and 50-362**  
**Withdrawal of Amendment Application Nos. 206 and 191**  
**Component Cooling Water System Licensing Basis**  
**San Onofre Nuclear Generating Station, Units 2 & 3**

REFERENCES: (1) Letter dated December 29, 2000, from Dwight E. Nunn (SCE) to Document Control Desk (NRC) Subject: Docket Nos. 50-361 and 50-362, Amendment Application Nos. 206 and 191, Component Cooling Water System Licensing Basis, San Onofre Nuclear Generating Station, Units 2 and 3

(2) Letter dated February 14, 1989, from M. O. Medford (SCE) to Document Control Desk (NRC) Subject: Docket Nos. 50-361 and 50-362, Component Cooling Water System Information Request, San Onofre Nuclear Generating Station, Units 2 and 3

Gentlemen:

This letter withdraws the December 29, 2000 request by Southern California Edison (SCE) (Reference 1) for NRC approval of a license amendment request. The referenced license amendment request would have eliminated the need to consider the effects on the Component Cooling Water (CCW) system of low probability scenarios involving both a Loss of Coolant Accident (LOCA) and a Design Basis Earthquake (DBE) for San Onofre Units 2 and 3.

Based on discussions with the staff, SCE has resolved this issue through the Commitment Management program. The original commitment to consider LOCA and DBE concurrently for the CCW system design was a result of an SCE understanding of the requirements of 10CFR50, Appendix A, General Design Criteria (GDC) 2, "Design Bases for Protection Against Natural Phenomena," as described in Reference 2. Based on guidance contained in the NRC Inspection Manual as discussed with the staff, SCE recognizes that this was an overly conservative understanding of the requirements of GDC 2 as related to the CCW system. As a result of this commitment change, the CCW system will be required to remain capable of performing its function following the effects of either a DBE or a LOCA, but not both events concurrently.

If this is not in accordance with your understanding, please advise. If I can be of any additional assistance in this matter, please feel free to contact me or Mr. J. L. Rainsberry (949/368-7420).

Sincerely,



cc: E. W. Merschoff, Regional Administrator, NRC Region IV  
J. N. Donohew, NRC Project Manager, San Onofre Units 2 and 3  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 & 3

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