

March 18, 2002

Dwight E. Nunn  
Vice President

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

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudication's Staff  
Washington, D.C. 20555

Director, Office of Nuclear Regulatory Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**  
**RESPONSE TO ORDER MODIFYING LICENSES**  
**ANSWER TO ORDER MODIFYING LICENSES**  
**REQUEST FOR EXTENSION TO FILE ANSWER AND REQUEST HEARING**  
**San Onofre Nuclear Generating Station, Units 2 and 3**

Enclosures: (1) Response to Conditions B.1 and B.2 – unnecessary or unsafe requirements  
(2) Response to Condition C.1 – compliance discussion and schedule

Southern California Edison (SCE) has received the Order Modifying Licenses ("Order") transmitted by letter from Samuel J. Collins to Harold B. Ray dated February 25, 2002 applicable to the San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2&3). This letter provides the SCE response required by Section III, and the answer and request for extension required by Section IV of the Order.

Enclosure (1) identifies requirements contained in the Order which SCE considers unnecessary or unsafe because of specific circumstances at SONGS 2&3 and provides supporting justification.

Enclosure (2) discusses each requirement set forth in Attachment 2 of the Order and provides a schedule for SONGS 2&3 to achieve compliance.

#### **SAFEGUARDS INFORMATION**

**NOTICE: DECONTROLLED upon separation from enclosures (1) and (2).**

P. O. Box 128  
San Clemente, CA 92674-0128  
949-368-1480  
Fax 949-368-1490

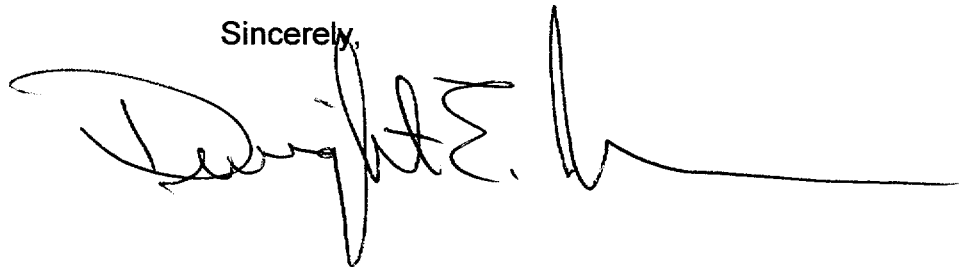
*X SCE*  
*1 advanced copy to B. Hunt*

March 18, 2002

SCE has provided a full response to the requirement stated at B.2(a) of the Order Attachment 2. In the event the methods of analysis and results are unacceptable to the NRC, pursuant to Section IV of the Order, SCE reserves the right to a hearing to contest any unfavorable action by the NRC regarding this requirement. Alternatively SCE requests an extension of time until August 31, 2002 to perform additional analysis as necessary to remedy deficiencies identified by the NRC.

Note that the enclosures to this letter contain Safeguards Information as defined by 10 CFR 73.2. This transmittal letter may be decontrolled upon separation from its enclosures.

Sincerely,

A handwritten signature in black ink, appearing to read "E. W. Mershoff", followed by a long horizontal line extending to the right.

Enclosures

cc: E. W. Mershoff, Regional Administrator, NRC Region IV  
G. M. Tracy, NRC Chief, Operator Licensing Human Performance & Plant Support Branch  
L. Raghavan, , NRC Project Manager, San Onofre Units 2 and 3  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3


#### **SAFEGUARDS INFORMATION**

**NOTICE: DECONTROLLED upon separation from enclosures (1) and (2).**

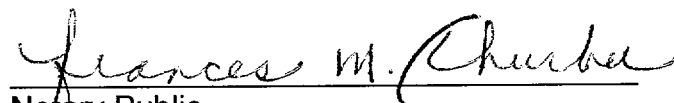
State of California  
County of San Diego

Subscribed and sworn to (or affirmed) before me this 18 day of

March, 2002, by

  
Dwight E. Nunn  
Vice President



  
Notary Public

**SAFEGUARDS INFORMATION**

**NOTICE: DECONTROLLED upon separation from enclosures (1) and (2).**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of ANSWER TO ORDER MODIFYING LICENSES were served on this 18<sup>th</sup> day of March, 2002, upon the persons listed below, via overnight delivery.

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudication's Staff  
Washington, DC 20555

Director, Office of Nuclear Regulatory Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Assistant General Counsel for Materials  
Litigation and Enforcement  
Office of General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064



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