

November 22, 2004

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

**Subject: Foreign Ownership, Control, or Influence Certification
Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station, Units 2 and 3**

Gentlemen:

- References:**
- 1. March 22, 2002 letter from Michael L. Springer, (NRC) to Harold B. Ray (SCE), Subject: Security Clearance Instructions**
 - 2. April 9, 2003 letter from Thomas O. Martin, (NRC) to Gordon A. Broussard (SCE), Subject: San Onofre Facility Security Clearance**

This letter is to clarify Southern California Edison's (SCE's) understanding of when it is required to provide certification to the NRC on whether significant changes have occurred related to the Foreign Ownership, Control, or Influence (FOCI) determination for San Onofre. SCE has received References (1) and (2). In Reference (1) it was stated that SCE "will be asked to certify annually to the NRC ..." and in Reference (2) it was stated that SCE will be required "to submit to the NRC's Division of Nuclear Security (DNS) an annual (from the date of this letter) certification ..."

In both references the NRC contact was identified as Mr. J. Keith Everly. On April 5, 2004, SCE contacted Mr. Everly for clarification, and based on the direction provided by Mr. Everly, SCE is awaiting an additional request from the U. S. Nuclear Regulatory Commission before updating the FOCI Certification for San Onofre. If this is not in accordance with NRC requirements, please advise.

November 22, 2004

If you have any questions or require additional information, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to read "B. S. Mallet". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

**cc: B. S. Mallet, Regional Administrator, Region IV
J. K. Everly, Division of Nuclear Security
B. M. Pham, NRR Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3**