

10 CFR 50.54(f)

June 6, 2012

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

**Subject: Docket Nos. 50-361 and 50-362
90 Day Response to March 12, 2012 Information Request
Regarding Recommendation 9.3 of the Near Term Task Force Report
San Onofre Nuclear Generating Station, Units 2 and 3**

Dear Sir or Madam:

Reference: NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident; dated March 12, 2012

On March 12, 2012, the NRC staff issued a *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident* (Reference 1). In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), Reference 1 requests that addressees submit a written response to certain of these information requests within 90 days of its issuance.

This letter provides Southern California Edison's (SCE) response to the specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. The SCE responses to each specific request are presented in Enclosures 1 through 4 to this letter:

Enclosure 1 Response to EP Communications Request #2

Enclosure 2 Response to EP Staffing Request #3

Enclosure 3 Response to EP Staffing Request #4

Enclosure 4 Response to EP Staffing Request #5

This letter contains new regulatory commitments. The specific regulatory commitments are identified in Enclosure 5 of this letter.

P.O. Box 128
San Clemente, CA 92672
(949) 368-9275 PAX 89275
Fax: (949) 368-9881
Doug.Bauder@sce.com


June 6, 2012

Should you have any questions concerning the content of this letter, please contact Larry McCann at 949-368-9281.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6th, 2012

By:

A handwritten signature in black ink, appearing to read 'Douglas Bauder', written over a horizontal line.

Douglas Bauder

Site Vice President and Station Manager

Enclosures (5)

cc: (with Enclosures)

E. E. Collins, Regional Administrator, NRC Region IV

R. Hall, NRC Project Manager, San Onofre Units 2 and 3

G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

**Enclosure 1 – SCE Response to 50.54(f) Information Request Regarding
Recommendation 9.3 of the Near Term Task Force Report
EP Communications Request #2**

Requested Action # 2:

Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Actions Taken or Planned:

Action	Expected Delivery By
Ordered one portable diesel generator to provide backup power for plant internal phone system and outdoor radios.	8/15/12
Ordered one portable diesel generator to supply power to radio chargers and handheld portable satellite phones if power is not available from fixed emergency generators.	8/15/12
Ordered 8 multi-radio charging units for three handheld radio types; total capacity is 48 batteries at a time for handheld radios used in plant operations.	8/15/12
Ordered 12 handheld satellite phones that utilize a battery power source to increase the overall diversity of communication power supplies to provide communications capability in the event of unavailability of cellular and land-line phones.	8/15/12

**Enclosure 2 – SCE Response to 50.54(f) Information Request Regarding
Recommendation 9.3 of the Near Term Task Force Report
EP Staffing Request #3**

Requested Action # 3:

Identify how the augmented staff would be notified given degraded communications capabilities.

Methods for Notification Under Degraded Capabilities:

Assumptions (NEI 12-01, Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities:

1. On-site communications infrastructure remains available provided that the credited components are reasonably protected from seismic, wind, and flooding events; are maintained through programmatic controls; have a power source consistent with the other assumptions in this section; and are employed in accordance with implementing actions specified in existing procedures or guidelines.
2. Offsite infrastructure supporting communications systems is inoperable in the area surrounding the site (e.g., cellular telephone or microwave towers, telephone central office buildings, telephone lines, etc.). Apply a default distance value, in all directions, of approximately 25 miles from the plant site.
3. Communications infrastructure in locations beyond the area defined above is not significantly impacted by the event.
4. Communications equipment located at an offsite response facility, and supplied from a backup power source, is assumed to be functional. The availability of this equipment must be determined in conjunction with Assumption #2, above. For example, a diesel generator-powered satellite telephone system at an Emergency Operations Center (EOC) located 4 miles from the plant would be available since the system does not rely upon ground-based communications infrastructure within the affected area. A land-line telephone in the same EOC would not be available due to local infrastructure impacts consistent with Assumption #1.

Method	Description
Automatic Response	A proceduralized Automatic Response process will be used and personnel will be trained to ensure the Emergency Response Organization (ERO) responds following a defined "major event". The scheduled completion date is 12/31/12.

**Enclosure 3 – SCE Response to 50.54(f) Information Request Regarding
Recommendation 9.3 of the Near Term Task Force Report
EP Staffing Request #4**

Requested Action # 4:

Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

Methods for Site Access Following Large Scale Natural Event:

Method	Description
Roadway	There are several roadways into the San Onofre Nuclear Generating Station. If one path were impassable, detours using other roadways are viable. Major routes include: <ul style="list-style-type: none">• Interstate 5 and adjoining roadways from the north• Interstate 5 and adjoining roadways from the south• Surface roads through Marine Corps Base- Pendleton from the east• Interstate 15 is available for north/south movement• State Routes 74, 76, and 78 support east/west movement.
Air	Access to San Onofre can be provided from staging areas via helicopters owned or arranged for by SCE. Availability of these helicopters is established in the SCE Operations Support Business Unit, Transportation Services Department Emergency Response and Business Continuity Plan.

**Enclosure 4 – SCE Response to 50.54(f) Information Request Regarding
Recommendation 9.3 of the Near Term Task Force Report
EP Staffing Request #5**

Requested Action # 5:

Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

Interim Actions Taken or Planned:

Action
None. SCE is not planning on supplementing staff at this time. However, we are assessing initial on-shift ERO staffing for event conditions in response to the requirements of changes to 10CFR Parts 50, Appendix E, Section 4(a)(i), by December 24, 2012.

**Enclosure 5 - List of Commitments for SCE Response to 50.54(f)
Information Request Regarding Recommendation 9.3 of the Near Term Task
Force Report**

Commitment	Scheduled Completion Date
1. A proceduralized Automatic Response process will be used and personnel will be trained to ensure the Emergency Response Organization (ERO) responds following a defined "major event".	12/31/12