

10CFR 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  
Southern California Edison Response to NRC Request for  
Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding  
Aspects of Recommendations 2.1 and 2.3 of the Near-Term Task  
Force Review of Insights from the Fukushima Dai-ichi Accident  
San Onofre Nuclear Generating Station, Units 2 and 3**

- References:
- 1) 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
  - 2) NRC Letter, Prioritization of response due dates for request for Information pursuant to Title 10 of the Code of Federal Regulations 50.54(f) regarding Flooding Hazard Reevaluation for Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated May 11, 2012
  - 3) NRC Letter, Endorsement of Nuclear Energy Institute (NEI) 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features", dated May 31, 2012

Dear Sir or Madam:

On March 12, 2012, the NRC issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosures 2 and 4 of Reference 1 contain specific Requested Actions, Requested Information, and Required Responses associated with Recommendations 2.1 and 2.3 for Flooding Evaluations and Walkdowns. This letter provides Southern California Edison's 90 day response to Reference 1 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3.

### **Recommendation 2.1: Flooding**

The response date for SONGS Units 2 and 3 flood hazard evaluation was identified in Reference 2 as March 12, 2015 which corresponds to 3 years from the date of Reference 1. Southern California Edison (SCE) plans to comply with the requested response date.

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

SCE plans to meet the requested date for the other required responses in Enclosure 2 of Reference 1. Specifically, an approach for developing an Integrated Assessment for SONGS Units 2 and 3 will be submitted 60 days after the NRC endorses Integrated Assessment Guidance. In addition, an Integrated Assessment report for SONGS Units 2 and 3, if it is necessary, will be submitted 2 years after the flood evaluation is submitted.

### **Recommendation 2.3: Flooding**

For flooding recommendation 2.3 (walkdowns), Enclosure 4 of Reference 1 states that each licensee is to confirm that it will use the NRC-endorsed flooding walkdown procedure or provide a description of the process it will use.

SCE confirms that it will use the flooding walkdown procedure (NEI 12-07, *Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features*) endorsed by Reference 3 as the basis for the flooding walkdowns at SONGS Units 2 and 3.

SCE plans to comply with the response timeline in Enclosure 4 of Reference 1. Specifically, SCE will submit a report documenting the results of its flooding design basis walkdowns at SONGS Units 2 and 3 on November 27, 2012, which corresponds to 180 days after NRC endorsement of the generic guidance.


This letter contains no new regulatory commitments.

Should you have any questions concerning the content of this letter, please contact Cheryl Atooli at 949-368-3842.

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

Executed on June 6<sup>th</sup>, 2012

By: \_\_\_\_\_

  
Douglas R. Bauder  
Site Vice President and Station Manager

cc: 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