

10 CFR 2.202
10 CFR 2.390(d)(1)

February 27, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-001

**SUBJECT: Docket Nos. 50-361 and 50-362
License Nos. NPF-10 and NPF-15
Southern California Edison's Overall Integrated Plan in Response to March
12, 2012 Commission Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External
Events (Order Number EA-12-049)
San Onofre Nuclear Generating Station, Units 2 and 3**

References:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events dated March 12, 2012.
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External events," Revision 0, dated August 28, 2012
3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August, 2012
4. Southern California Edison's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation strategies for Beyond-Design-Basis External events (Order Number EA-12-049), dated October 29, 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Southern California Edison (SCE). Reference 1 was immediately effective and directs SCE to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an Overall Integrated Plan by February 28, 2013. The NRC Interim Staff Guidance (ISG) (Reference 2) was issued August 29, 2012 which endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and

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exceptions identified in Reference 2. Reference 3 provides direction regarding the content of this Overall Integrated Plan.

Reference 4 provided the SCE initial status report regarding mitigation strategies, as required by Reference 1.

The purpose of this letter is to provide the Overall Integrated Plan pursuant to Section IV, Condition C.1, of Reference 1. This letter confirms SCE has received Reference 2 and has an Overall Integrated Plan developed in accordance with the guidance for defining and deploying strategies that will enhance the ability to cope with conditions resulting from beyond-design-basis external events.

The information in the enclosure provides the SCE Overall Integrated Plan for mitigation strategies pursuant to Reference 3. The enclosed Integrated Plan is based on conceptual design information. Final design details and associated procedure guidance, as well as any revisions to the information contained in the Enclosure, will be provided in the 6-month Integrated Plan updates required by Reference 1.

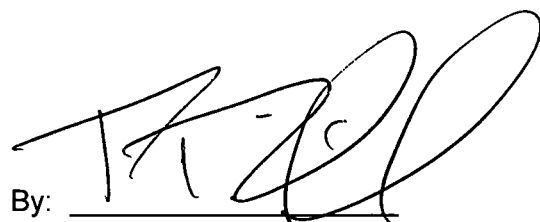
The Enclosure contains Security Related Information. SCE requests that the Enclosure be withheld from public disclosure in accordance with 10 CFR 2.390(d)(1).

A version of this letter edited for public disclosure was signed and submitted to the NRC on this date.

This letter contains no new regulatory commitments. If there are any questions regarding this plan, please contact Mr. Steven D. Root at 949-368-6480.

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

Executed on 2/27/13

By: 

Peter T. Dietrich
Senior Vice President and Chief Nuclear Officer

Enclosure: San Onofre Nuclear Generating Station FLEX Overall Integrated Plan
Response to NRC Order EA-12-049

cc: Director, Office of Nuclear Reactor Regulation
E. E. Collins, Regional Administrator, NRC Region IV
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3
B. Benney, NRC Project Manager, San Onofre Units 2 and 3

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