



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 22, 2014

Mr. Peter T. Dietrich
Senior Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 –
NRC RESPONSE TO SOUTHERN CALIFORNIA EDISON'S FINAL
RESPONSE TO THE MARCH 2012 REQUEST FOR INFORMATION LETTER

Dear Mr. Dietrich:

By letter dated March 12, 2012,¹ the U.S. Nuclear Regulatory Commission (NRC) issued a request for information per Title 10 to the *Code of Federal Regulations* (10 CFR), Subpart 50.54(f) (50.54(f) letter), to all nuclear power reactor licensees and construction permit holders in response to lessons-learned from Japan's March 2011, earthquake and subsequent tsunami. Enclosures 1 through 4 to the 50.54(f) letter include information requests regarding Recommendations 2.1 and 2.3 for seismic and flooding hazard actions, and Enclosure 5 includes Recommendation 9.3 for emergency preparedness, as part of the response to the *Near-Term Task Force Recommendations for Enhancing Reactor Safety in the 21st Century* report, issued July 12, 2011.² The 50.54(f) letter requests licensees to perform seismic and flooding walkdowns and hazard re-evaluations, and perform emergency preparedness communication and staffing evaluations for prolonged loss of power events.

By letter dated June 12, 2013,³ Southern California Edison (SCE) submitted a letter certifying permanent cessation of power operations of San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, per 10 CFR Subpart 50.82(a)(1)(i). Subsequently, by letters dated June 28,⁴ and July 22, 2013,⁵ SCE submitted letters certifying that the fuel has been permanently removed from the Unit 3 and Unit 2 reactors, respectively, per 10 CFR Subpart 50.82(a)(1)(ii). SCE acknowledged in the June and July letters that, once the certifications are docketed, the SONGS Units 2 and 3 licenses no longer authorize operation of the reactors, or placement or retention of fuel in the reactor vessels.

By letter dated September 30, 2013,⁶ SCE stated that the SONGS units are no longer operating plants, but are permanently shut down and defueled reactors. Therefore, the licensee considers the requests of the 50.54(f) letter to no longer be applicable to SONGS, Units 2 and 3, and no longer plans on proceeding with any further implementation of the requests in the 50.54(f) letter or any alternative approach for Recommendations 2.1, 2.3 and 9.3.

¹ The 10 CFR 50.54(f) letter is available via the Agencywide Documents Access and Management System (ADAMS), Accession No. ML12053A340.

² The NTTF report is available under ADAMS Accession No. ML111861807.

³ The June 12, 2013 letter is available under ADAMS Accession No. ML131640201.

⁴ The June 28, 2013 letter is available under ADAMS Accession No. ML13183A391.

⁵ The July letter is available under ADAMS Accession No. ML13204A304.

⁶ The September letter is available under ADAMS Accession No. ML13276A020.

The NRC staff verified that the SONGS, Units 2 and 3, certifications are docketed and that the licenses no longer authorize operation of the reactors or placement or retention of fuel in the reactor vessels. Further, the NRC staff has reviewed the licensee's responses to the information requests described in Enclosures 1 through 5 of the 50.54(f) letter and have determined that the requests are no longer necessary for SONGS, Units 2 and 3.

No further responses or actions associated with the 50.54(f) letter are necessary since the licensee is no longer authorized to load fuel into the vessel and potential fuel-related accident scenarios are limited to the spent fuel pool. Unlike the reactor, the safety of fuel located in the spent fuel pool is assured for an extended period through maintenance of pool structural integrity, which preserves coolant inventory and maintains margin to prevent criticality. Small changes in the flooding hazard elevation would not threaten the structural integrity of a flooded pool. Further, previous evaluations of spent fuel pool structures have determined that seismic margins are very large. As seismic and flooding studies continue for the remainder of the operating fleet, new information concerning the adequacy of design bases of spent fuel pools will be evaluated for applicability to decommissioned sites using existing NRC processes.

Based on the discussion above, the safety of the fuel stored in spent fuel pools would not be substantially affected by potential changes in the flooding or seismic hazard levels. Furthermore, for beyond design basis external events challenging the safety of the spent fuel, recovery and mitigation actions could be completed over a long period of time due to the slow progression of any accident as a result of the very low decay heat levels present in the pool within a few months following permanent shutdown of the reactor. Thus, spent fuel pool beyond design basis accident scenarios at decommissioning reactor sites do not require the enhanced communication and staffing that may be necessary for the reactor-centered events the 50.54(f) letter addresses.

Should you have any questions regarding this letter, please contact Mr. Nicholas DiFrancesco at 301-415-1115 or Nicholas.DiFrancesco@NRC.gov.

Sincerely,



Michele G. Evans, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

cc: Listserv

The NRC staff verified that the SONGS, Units 2 and 3, certifications are docketed and that the licenses no longer authorize operation of the reactors or placement or retention of fuel in the reactor vessels. Further, the NRC staff has reviewed the licensee's responses to the information requests described in Enclosures 1 through 5 of the 50.54(f) letter and have determined that the requests are no longer necessary for SONGS, Units 2 and 3.

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Based on the discussion above, the safety of the fuel stored in spent fuel pools would not be substantially affected by potential changes in the flooding or seismic hazard levels. Furthermore, for beyond design basis external events challenging the safety of the spent fuel, recovery and mitigation actions could be completed over a long period of time due to the slow progression of any accident as a result of the very low decay heat levels present in the pool within a few months following permanent shutdown of the reactor. Thus, spent fuel pool beyond design basis accident scenarios at decommissioning reactor sites do not require the enhanced communication and staffing that may be necessary for the reactor-centered events the 50.54(f) letter addresses.

Should you have any questions regarding this letter, please contact Mr. Nicholas DiFrancesco at 301-415-1115 or Nicholas.DiFrancesco@NRC.gov.

Sincerely,
/RA/

Michele G. Evans, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

cc: Listserv

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