

December 19, 2016

10 CFR 50.90

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Subject: **Docket No. 50-361, 50-362, 50-206 and 72-41  
Amendment Applications 227, 274, and 259  
Independent Spent Fuel Storage Installation (ISFSI) Only Security Plan  
San Onofre Nuclear Generating Station, Units 1, 2, and 3**

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) is submitting Amendment Applications 227, 274, and 259 for San Onofre Nuclear Generating Station (SONGS) Units 1, 2, and 3, respectively. The proposed amendments request approval of the SONGS Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (the "Plan" or "Security Plan") and removal of the Cyber Security requirements from the Operating Licenses. The Plan will supersede the current Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan at SONGS. The protection of material subject to the requirements of 10 CFR 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," is addressed in a separate plan. The future site configuration reflected in the Plan assumes the remaining spent fuel in the spent fuel pool has been moved to the ISFSI with no intention to return spent fuel to the spent fuel pool ("ISFSI-only" status). Spent fuel movement to the ISFSI is currently scheduled to be completed in 2019 (with a potential early finish of mid-2018). By letter dated December 15, 2016, SCE submitted amendment applications clarifying spent fuel will not be stored in the spent fuel pool once it is transferred to the ISFSI.

An evaluation of the proposed amendments is provided in Enclosures 1 and 2. The Plan is provided in Enclosure 3. Enclosure 4 contains the assumptions used in developing the Plan. Pursuant to 10 CFR 73.55(r), alternative measures which have been incorporated into the proposed Plan are discussed in Enclosure 5.

SCE requests approval of these amendment applications by January, 2018. Once approved, the amendment will be implemented within 60 days following SCE's submittal of a written certification to the NRC that all spent nuclear fuel assemblies have been transferred out of the spent fuel pools and placed in storage within the ISFSI.

NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS ~~"SECURITY RELATED INFORMATION"~~ AND ENCLOSURES 3, 4, AND 5 TO THIS LETTER CONTAIN ~~"SAFEGUARDS INFORMATION."~~ THIS INFORMATION MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION FROM THESE ENCLOSURES, THIS LETTER IS "DECONTROLLED."

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SCE requests that Enclosure 1, which contains Security-Related Information, be withheld from public disclosure in accordance with 10 CFR 2.390. Enclosures 3, 4, and 5 contain Safeguards Information as defined by 10 CFR 73.22 and their disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended.

In accordance with 10 CFR 50.91(b), SCE is notifying the State of California of this request for license amendment by providing a copy of this letter (without enclosures).

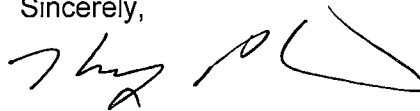
There are no new regulatory commitments in this letter or the enclosures.

Please contact Mr. James Kay at (949) 368-7418 if you have any questions or require additional information.

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

Executed on 12/19/2016  
(Date)

Sincerely,



Enclosures:

1. Evaluation of Proposed Changes (Security-Related Information)
2. Evaluation of Proposed Changes (Uncontrolled)
3. SONGS Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (Safeguards Information)
4. Programmatic Assumptions for ISFSI Only Sites (Safeguards Information)
5. Evaluation of Proposed Alternative Measures (Safeguards Information)

cc: K. Kennedy, Regional Administrator, NRC Region IV (w/o enclosures)  
M. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3 (w/o enclosures)  
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch (w/o enclosures)

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~~SAFEGUARDS INFORMATION~~