

10 CFR 2.202

October 29, 2012

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

**Subject: Docket Nos. 50-361 and 50-362  
License Nos. NPF-10 and NPF-15  
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)  
San Onofre Nuclear Generating Station, Units 2 and 3**

References:

1. Letter dated March 12, 2012 from E. J. Leeds and M. R. Johnson, USNRC, to Peter T. Dietrich, Southern California Edison Company, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events"
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, issued August 30, 2012 (ADAMS Accession Number ML12229A174)
3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide", Revision 0, dated August 2012 (ADAMS Accession No. ML12242A378)

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 initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms SCE has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities during this reporting period:

- Portable diesel generator sets, satellite phones, and radio chargers were ordered prior to the issuance of Reference 2.
- The following additional portable equipment was ordered prior to the issuance of Reference 2: portable diesel generator sets, satellite phones, and radio chargers.
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 3).
- Resources are being identified and project plans have been initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan as required by Condition IV.C.1.a of Reference 1.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal of the overall integrated plan:

- None at this time.


Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for San Onofre Nuclear Generating Station (SONGS) Unit 2 prior to December 31, 2016. (The second Unit 2 refueling outage after submittal of the overall integrated plan is currently expected to occur in summer 2017.)
- Implementation of the order will be completed for SONGS Unit 3 prior to December 31, 2016. (The second Unit 3 refueling outage after submittal of the overall integrated plan is currently expected to occur in fall 2017.)

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Steven D. Root, Manager of Special Projects, at 949-368-6480.

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

Executed on 10/29/2012

By:   
Douglas R. Bauder  
Site Vice President and Station Manager

- 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
- R. Hall, NRC Project Manager, San Onofre Units 2 and 3
- Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
- Mr. Eric E. Bowman, NRR/DPR/PGCB, NRC