

September 24, 2012

The Reverend Carissa Baldwin  
Director of Peace and Justice  
All Saints Church  
132 North Euclid Avenue  
Pasadena, CA 911901-1796

Dear Reverend Baldwin:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to the letter campaign to Chairman Allison Macfarlane, dated August 5, 2012, in which you and others conveyed your concerns about the safety of San Onofre Nuclear Generating Station (SONGS).

As you are aware, SONGS, Units 2 and 3, are currently shut down due to excessive steam generator tube wear. On March 15, 2012, the NRC sent an augmented inspection team (AIT) to the site in response to the January 31, 2012, steam generator tube leak in Unit 3 and the subsequent discovery of significant tube-to-tube wear on both of the Unit 3 steam generators and significantly less tube-to-tube wear on one of the two Unit 2 steam generators. For several months, this team of NRC inspectors, with assistance from other NRC experts, has been closely following the licensee's actions to evaluate the causes of the excessive tube wear and to develop corrective actions to prevent further tube degradation. On June 18, 2012, NRC personnel met with representatives of Southern California Edison (SCE) in San Juan Capistrano, California, to present the NRC's issues and observations resulting from the AIT inspection. As discussed in that meeting, the NRC understands the steam generator thermal hydraulic conditions that resulted in the tube degradation; that these conditions were not accurately predicted during design; and that the licensee is evaluating and developing additional actions to fix and prevent any additional tube-to-tube degradation due to excessive vibration.

On March 27, 2012, the NRC issued a Confirmatory Action Letter (CAL) to SCE, identifying the specific actions the licensee has committed to take prior to returning the units to power operation. The CAL can be viewed on the NRC Web site, <http://www.nrc.gov>, in the Agencywide Documents Access and Management System (ADAMS), at Accession No. ML12087A323. Under the terms of the CAL, each unit will remain shut down until the licensee provides its written evaluations and responses to all of the CAL items for that unit. The NRC will perform additional related inspections and reviews of that information. The NRC will not allow the plant to restart if it is not satisfied the plant can be operated without undue risk to public health and safety. The NRC will take as much time as needed in determining the appropriate actions to ensure the safety of the public, and will communicate its determinations to SCE regarding the restart of SONGS, Units 2 and 3, in writing.

Seismic hazards are being addressed for all U.S. nuclear plants as part of the lessons learned from the Fukushima Dai-ichi event in Japan. In March 2011, the Commission established a senior-level agency Near-Term Task Force to conduct a methodical and systematic review of NRC processes and regulations to determine if there are additional improvements that could be made to the regulatory system. This task force concluded that continued operation and

licensing activities do not pose an imminent risk to public health and safety. The task force also provided 12 recommendations to clarify and strengthen the regulatory framework. In October 2011, the NRC staff provided its proposed plan of action and prioritization of the task force recommendations, as well as actions beyond those recommended in the task force report. That plan is publicly available in ADAMS at Accession No. ML11272A111, and on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/commission/secys/2011/2011-0137scy.pdf>. On December 5, 2011, the Commission approved the staff's plan and provided additional direction to the staff.

On March 12, 2012, the NRC issued three orders requiring nuclear power plants to implement safety enhancements related to (1) mitigating strategies to respond to extreme external events resulting in the loss of electric power at plants, (2) ensuring reliable hardened containment vents (applicable only to boiling water reactors with Mark 1 or Mark 2 containments), and (3) enhancing spent fuel pool instrumentation. All operating nuclear power plants are required to begin implementation of the safety enhancements and to complete implementation within two refueling outages, or by December 31, 2016, whichever comes first. In addition, the NRC issued a formal request for information, requesting all operating reactor licensees to (1) reevaluate seismic and flooding hazards (including tsunami hazards) at their sites using present-day methods and information, (2) conduct walkdowns of their facilities to ensure protection against the seismic and flooding hazards in their current design basis, and (3) reevaluate their emergency communications systems and staffing levels. The NRC will evaluate SCE's response to the request for information in determining the need for plant modifications or further enhancements to address seismic and flooding hazards at SONGS. These orders and requests for information, as well as other information on the agency's response to the Fukushima event, are accessible on the NRC Web site at <http://www.nrc.gov/reactors/operating/ops-experience/japan-info.html>. The Commission has directed that the NRC staff should strive to complete and implement the lessons learned from the Fukushima accident with 5 years – by 2016.

As one of the agency's core organizational values, the NRC operates under the principle of openness. In addition, there are several ways for the public to participate. You can find out more information on the NRC's public Web site: <http://www.nrc.gov/public-involve.html>.

Thank you for your concerns about these matters.

Sincerely,

*/RA/*

Douglas A. Broaddus, Chief  
San Onofre Special Projects Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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Douglas A. Broaddus, Chief  
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Docket Nos. 50-361 and 50-362

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