

## UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 1600 EAST LAMAR BLVD ARLINGTON, TEXAS 76011-4511

March 4, 2013

Mr. Peter 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: ANNUAL ASSESSMENT LETTER FOR SAN ONOFRE NUCLEAR GENERATING

STATION, UNITS 2 AND 3 (REPORT 05000361/2013801 AND

05000362/2013801)

Dear Mr. Dietrich:

On February 14, 2013, the NRC completed its end-of-cycle performance review of San Onofre Nuclear Generating Station, Units 2 and 3. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from January 1 through December 31, 2012. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that performance at San Onofre Nuclear Generating Station, Units 2 and 3, during the most recent quarter was within the Regulatory Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because of one or more greater-than-green Security Cornerstone inputs, as described in NRC Inspection Report 05000361; 05000362/2012403 dated August 14, 2012 (ML12229A106). On December 20, 2012, the NRC completed Inspection Procedure 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area." The NRC concluded that your staff performed an acceptable evaluation of the greater-than-green finding(s). As indicated in our letter to you dated January 31, 2013 (ML13032A203), the NRC considers this finding closed. However, the finding will be considered for Action Matrix input until March 31, 2013. On April 1, 2013, San Onofre Nuclear Generating Station, Units 2 and 3, will be returned to the Licensee Response Column of the Action Matrix, unless additional Action Matrix inputs are identified.

In our midcycle assessment letter dated September 4, 2012, the NRC discussed a new cross-cutting theme in the human performance area (work practices component) associated with the aspect of procedural compliance. Specifically, the NRC identified four findings associated with the definition and effective communication of expectations regarding procedural compliance and personnel following procedures [H.4(b)]. The NRC staff has determined that this cross-cutting theme continues, based upon identification of four findings associated with H.4(b) during the current assessment period. The NRC staff has reviewed the actions proposed and being implemented by your staff to address the continuing theme and determined that these actions, if successfully implemented, should result in an improvement in this area. Therefore, the NRC staff determined that a substantive cross-cutting issue associated with H.4(b) does not

exist because the NRC does not have a concern with your staff's scope of effort and progress in addressing the cross-cutting theme. The NRC will continue to monitor your staff's effort and progress in addressing this theme until the theme criteria are no longer met.

San Onofre Units 2 and 3 have been shut down since January 2012. Some baseline inspection procedures, as well as performance indicators (PIs), cannot be accomplished or are invalid for plants in an extended (greater than 6 months) shutdown. The staff has determined that the following no longer provide valid indications of performance: Unplanned Scrams, Unplanned Power Changes, Unplanned Scrams with Complications, Reactor Coolant System Activity, Reactor Coolant System Leakage, and Mitigating Systems Performance Index. You should continue to submit PI data to the NRC in accordance with NEI 99-02 and superseding resolutions to frequently asked questions.

The NRC plans to conduct ROP baseline and supplemental inspections at your facility, in accordance with Inspection Manual Chapter (IMC) 0351, "Implementation of the Reactor Oversight Process at Reactor Facilities in an Extended Shutdown Condition for Reasons Other Than Significant Performance Problems." The NRC transitioned oversight of San Onofre Units 2 and 3 to IMC 0351 on September 4, 2012, due to the extended shutdown of both units caused by unusual steam generator tube degradation in the recently replaced steam generators. IMC 0351 provides guidance for implementation of the Reactor Oversight Process for plants such as San Onofre where the shutdown is a result of a significant technical issue, and not widespread performance issues.

The enclosed inspection plan lists the inspections scheduled through June 30, 2014. Routine inspections performed by resident inspectors are not included in the inspection plan. Due to transition to IMC 0351, some scope changes to baseline inspections, as well as those inspections performed by the resident inspectors, have been planned. These changes are described in the memorandum dated September 4, 2012, from Mr. Kriss Kennedy, Director, Division of Reactor Projects, Region IV, to Mr. Ho Nieh, Director, Division of Inspection and Regional Support, Office of Nuclear Reactor Regulation (ML12242A518). The inspections listed during the last 9-months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security-related inspections, which will be sent via separate, non-publicly available correspondence.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Please contact Mr. Ryan Lantz, Chief, SONGS Project Branch, at 817-200-1173 with any questions you have regarding this letter.

Sincerely,

/RA/

Kriss M. Kennedy, Director Division of Reactor Projects

Docket Nos. 50-361, 50-362 License Nos. NPF-10, NPF-15

Enclosure:

San Onofre Nuclear Generating Station Inspection/Activity Plan

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## G:\ORA\SPB\SONGS EOC Letter

| ADAMS: □ No ☑ Y | es               | Complete  | Reviewer Initials: REL |
|-----------------|------------------|-----------|------------------------|
|                 |                  | ble       | ✓Non-Sensitive         |
|                 | ☐ Non-publicly A | Available | ☐ Sensitive            |
| RIV:SRI:SPB     | SPE:SPB          | C:SPB     | D:DRS                  |
| GAGeorge        | NHTaylor         | RELantz   | TBlount                |
| T – RELantz     | /RA via Email/   | /RA/      | /RA/ JAClark for       |
| 2/27/13         | 2/25/13          | 2/27/13   | 2/28/13                |
| DD:DRP          | TM:SONGS SP      | D:DRP     |                        |
| MLScott         | ATHowell         | KMKennedy |                        |
| /RA/            | /RA via Email/   | /RA/      |                        |
| 2/27/13         | 3/4/13           | 3/4/13    |                        |

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Report 22

San Onofre Inspection / Activity Plan

03/01/2013 - 06/30/2014

No. of Staff on Site 8 Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping Inspection of Near-Term Task Force Recommendation 2.3 Flooding Walkdowns Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns Title Radiological Hazard Assessment and Exposure Controls In-Plant Airborne Radioactivity Control and Mitigation Radioactive Gaseous and Liquid Effluent Treatment Radiological Environmental Monitoring Program Occupational Exposure Control Effectiveness Occupational ALARA Planning and Controls - TRIENNIAL FIRE PROTECTION INSPECTION Problem Identification and Resolution Inservice Inspection Activities - PWR Inservice Inspection Activities - PWR Radiation Monitoring Instrumentation - RAD PROTECTION - PUBLIC SAFETY RETS/ODCM Radiological Effluent - BIENNIAL EXERCISE INSPECTION Occupational Dose Assessment **EP PERFORMANCE INDICATORS** - UNDERGROUND PIPING PHASE - UNIT 2 INSERVICE INSPECTION Alert & Notification System Drill/Exercise Performance Fire Protection ∏riennial] Fire Protection [Triennial] **ERO Drill Participation** - FLOODING WALKDOWNS - INSERVICE INSPECTION Exercise Evaluation - SEISMIC WALKDOWNS - RADIATION SAFETY - RADIATION SAFETY - BIENNIAL PI&R Inspection Activity IP 71151-EP01 IP 71151-EP02 IP 71151-EP03 IP 71151-OR01 IP 71151-PR01 IP 7111108P IP 7111105T IP 7111105T IP 7111108P IP 71124.03 IP 71124.06 IP 71124.08 IP 2515/182 IP 2515/188 IP 71124.02 IP 71124.04 IP 71124.01 IP 71124.05 IP 71124.07 IP 2515/187 IP 7111401 IP 71152B SB2-ISI SB2-RP SB2-RP 2515/188 SB2-ISI SB 52B **EB2-05T 32 2678** 2515/187 **ГІ-182** EP-3 12/31/2013 07/19/2013 11/08/2013 10/12/2013 10/25/2013 10/25/2013 10/25/2013 10/25/2013 10/25/2013 10/25/2013 10/25/2013 10/25/2013 02/07/2014 02/07/2014 02/07/2014 02/07/2014 06/30/2013 12/31/2013 07/19/2013 10/25/2013 10/25/2013 03/14/2014 End Planned Dates 01/01/2013 10/01/2013 Start 01/01/2013 01/01/2013 07/15/2013 10/21/2013 10/14/2013 0/21/2013 0/21/2013 0/21/2013 10/21/2013 0/21/2013 0/21/2013 0/21/2013 0/21/2013 02/03/2014 07/15/2013 11/04/2013 32/03/2014 32/03/2014 03/10/2014 02/03/2014 Number Unit 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 2,3 က 2 2 2

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

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14:51:00

**TSB 52B** Planned Dates Start End Unit Number

- BIENNIAL PI&R Inspection Activity

Inspection / Activity Plan 03/01/2013 - 06/30/2014

San Onofre

Title

No. of Staff on Site

03/24/2014 03/28/2014 2,3

IP 71152B

Problem Identification and Resolution

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.