



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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March 31, 2000

Harold B. Ray, Executive Vice President  
Southern California Edison Co.  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, California 92674-0128

**SUBJECT: PLANT PERFORMANCE REVIEW - SAN ONOFRE NUCLEAR GENERATING  
STATION, UNITS 2 AND 3**

Dear Mr. Ray:

The purpose of this letter is to communicate our assessment of your performance and to inform you of our planned inspections at your facility. On March 2, 2000, we completed a Plant Performance Review (PPR) of the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, facility. We conduct these reviews to develop an integrated overview of the safety performance of each operating nuclear power plant. We use the results of the PPR in planning and allocating inspection resources and as inputs to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from January 25, 1999, through February 11, 2000, but emphasized the last 6 months to ensure that our assessment reflected your current performance. Our most recent summary of plant performance at SONGS was provided to you in a letter dated September 16, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We are beginning initial implementation of the revised reactor oversight process industry-wide, including your facility, on April 2, 2000.

This PPR reflects continued process improvements as we make the transition into the revised reactor oversight process. You will notice that the following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we are organizing the results into the strategic performance arenas embodied in the revised reactor oversight process. Additionally, in assessing your performance, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with the inspection results. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

During the last 6 months, Unit 2 continuously operated at or near 100 percent power. Unit 3 also operated at or near 100 percent power, except when your staff reduced power to 65 percent to repair a feedwater pump.

Based on a review of inspection results and the performance indicators, we did not identify any significant performance issues in the reactor safety, radiation safety, or safeguards strategic arenas. Only baseline inspections are planned, with one exception. We will conduct an Operational Safeguards Response Evaluation (OSRE) based on the time since the last OSRE, changes made to your security program, and past performance. We will continue with OSRE inspections until the industry proposed Self-Assessment Program is approved by the NRC staff as an acceptable substitute for the OSRE inspections. In addition, we note that you plan to install a number of intrusion detection system upgrades to address environmental factors, as well as to address the separation of Unit 1 from Units 2 and 3. We plan to focus our baseline inspections on these upgrades.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that was used during this PPR process to arrive at our integrated view of your performance trends. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering, and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The enclosed PIM includes items summarized from inspection reports or other docketed correspondence regarding SONGS, Units 2 and 3. We did not document all aspects of licensee programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the attached PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2000 through March 2001 at SONGS, Units 2 and 3, to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival onsite. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future because of emerging performance issues at SONGS, Units 2 and 3, or other Region IV facilities. Routine resident inspections are not listed because of their ongoing and continuous nature.

We will inform you of any changes to the inspection plan. If you have any questions, please contact me at (817/860-8137).

Sincerely,

**/RA/**

Linda Joy Smith, Chief  
Project Branch E  
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Docket Nos.: 50-361

50-362

License Nos.: NPF-10

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Enclosures:

1. Plant Issues Matrix
2. Inspection Plan

cc w/enclosures:

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