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November 19, 2012

SENT ELECTRONICALLY

Dr. Hitoshi Kaguchi
Director, MHI Steam Generator Repair Site Team
Mitsubishi Nuclear Energy Systems, Inc.
c/o San Onofre Nuclear Generating Station
14300 Mesa Road (G55-SGR)
San Clemente, CA 92672

Response Required YES

**San Onofre Nuclear Generating Station
Steam Generator Repair Project
Matrix of Design Parameter Questions**

References:

1. Contract 4500024051

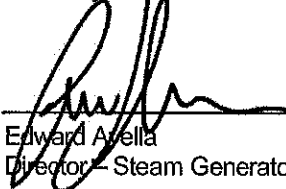
Dr. Kaguchi:

Mitsubishi Heavy Industries, Inc. (MHI) recently provided Southern California Edison (SCE) with a spreadsheet containing thirty-eight questions regarding licensing, design and implementation elements for steam generator design via matrix attached to an email sent to Noboru Kubo dated November 10, 2012. To date, SCE has provided seventeen responses. Of the responses SCE provided, much of the information was available in existing documents such as the certified design specification and the WCAP prepared by Westinghouse Electric Corporation (WEC) to support the 10CFR50.59 Evaluation. Based on the research conducted, SCE is concerned with MHI's ability to provide a remedy for the replacement steam generators.

Some of the thirty-eight questions relate to sensitivity or bounding limits of the WEC analyses. Limiting bounds for a variety of interrelated parameters leads to a 'matrix' of potential solutions. WEC has stated that they are unable to provide bounding limits for all of the parameters as requested, however, could evaluate a specified group of parameters in a timely manner. As has been communicated verbally to the MHI staff at SONGS, MHI is the designer of record and should be capable of developing a replacement design without dependence on SCE for most of the information requested in the subject matrix. MHI will need to develop the design further, then work with WEC on specific changes requiring preliminary evaluation.

SCE is concerned on MHI's level of research conducted, and lack of understanding of the WEC analyses conducted in support of the 10CFR50.59 Evaluation. Due to the concerns expressed above, SCE will continue to evaluate MHI's performance on an on-going basis and provide feedback as appropriate. SCE will continue to work with MHI on the development of an acceptable interim and permanent remedy. Should you have any questions or would care to discuss this issue further, please do not hesitate to contact John Manso at 949-368-2813 or Mike Moran at 949-368-2720 or myself at 949-368-2030.

Sincerely,



Edward Avella
Director - Steam Generator Repair (SGR) Project

EA/ca

cc: M.Moran (SCE), M.Anderson (SCE), D.Wood (SCE), J.Manso (SCE), Y.Kao (SCE), G.Ward (SCE), J.Julien (SCE), SGR.Team@sce.com
H.Hirano (MHI), J.Hutter (MNES), T.Kanabushi (MHI)