

**Questions from City of Oceanside Constituents**  
**Submitted by CEP Member, Honorable Jerry Kern, Oceanside City Council**  
**Answers Provided by SCE**  
**March 27, 2015**

1. **Question:** What is Edison's plan to make sure the local economies and workers are included in the money set aside for decommissioning. There is great concern that out of state contractors will be employed to decommission the plant and that the local work force will be excluded from the process.

**Response:** Southern California has a highly skilled and talented workforce and SCE recognizes this. SCE has and continues to engage the local work force in the decommissioning of San Onofre. Most recently, a construction company located in Southern California was selected to perform a major station project, and the company has strong ties to the local trade unions and laborers. The name of the local company will be made public sometime after April 3, when the agreement is scheduled to be executed. With decommissioning work taking more than 20 years to complete, having localized labor and professional services to support this effort is a critical component for the project's success. To help quantify the impact of decommissioning on the local community, SCE is planning an economic impact study, the scope of which includes job impacts. Findings from the study are expected to be available in the fourth quarter of 2015. It should be noted a few Community Engagement Panel members directly represent southern California businesses and labor unions, so the communities they represent remain part of the process.

2. **Question:** There seems to be a rapid decline in onsite qualified maintenance staffing over the next two years and the jobs are being assigned to outside contractors. If the staffing requirements are met with current qualified staff, why are they being let go in favor of an outside contractor? There are two components to have a robust safety program: personnel and equipment. No matter how good the equipment if you do not have the personnel that are qualified and knowledgeable the safety system is not what is required for a plant of this size and complexity.

**Response:** SCE now has and will continue to maintain a qualified and knowledgeable staff to perform the work safely during every phase of decommissioning. Worker qualifications for an operating nuclear power plant, in some cases, are different than for a decommissioning plant because the daily activities and scope of work has changed. As a result, staffing needs will fluctuate over time in order to accommodate the changing workload.

**Question:** This is a change from the current storage system. What are the benefits vs. risk with this system as compared against the current system?

**Response:** The current storage system, NUHOMs by Areva, and the recently selected Holtec system are equally robust and engineered to provide safe dry storage for San Onofre fuel. The primary difference between the two systems is a design feature where the Holtec system is partially underground and the canisters are stored vertically, while the NUHOMS system is above ground and the canisters are stored horizontally.

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3. **Question:** If this system is being used elsewhere in the United States what is the geologic condition of those sites?

A similar but earlier generation underground design is in use at Humboldt Bay in northern California. Geologic conditions are more like those at SONGS and, in particular, it is also a seismically active region. A Holtec above ground system is installed at Diablo Canyon Nuclear Power Plant in San Luis Obispo, CA. Those geologic conditions, like Humboldt Bay, are comparable to SONGS.

4. **Question:** Has sea level rise and shoreline erosion, both short term and long term, been taken into the consideration?

**Response:** Sea level rise and shoreline erosion, both short and long term, are evaluated in the support of the application for a Coastal Development Permit. The Coastal Commission is conducting its review.

5. **Question:** Does the design take into consideration localized ground motion and liquefaction during a seismic event?

**Response:** Localized ground motion and liquefaction during a seismic event are also addressed in support of the application for a Coastal Development Permit. The Coastal Commission is conducting its review.

6. **Question:** How will below ground storage be monitored/ managed and in case of a problem what is the mitigation/ recovery plan?

**Response:** Holtec's canister integrity monitoring program is designed to prevent, detect, monitor and address any cracking or corrosion that may occur over time. The dry cask storage system also will be monitored by operators who are onsite 24 hours a day/7 days a week, observing system parameters such as temperature. At SCE's request, Holtec also will provide an empty dry storage canister to be used for advanced testing and inspection techniques at San Onofre, in order to enhance existing industry aging management programs. In addition, SCE is leveraging the Holtec project by partnering with the Electric Power Research Institute (EPRI) to apply leading-edge inspection techniques at San Onofre.

7. **Question:** What site studies are being done or have been completed by the vendor to determine seismic risk? Has there been an independent review of the process and data and who performed that review and how current is the data? I feel this last question is vitally important to assess the seismic risk that must be accounted for before there is any long term commitment to on site storage."

**Response:** The vendor, Holtec International, has qualified the design to withstand the same seismic spectra as the currently installed ISFSI storage system. Holtec International submitted a license

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amendment to the NRC to revise the Holtec Certificate of Compliance (CoC) to include this criteria. The NRC performs the technical review of the amendment. The assumed seismic accelerations for the ISFSI, 1.5g Horizontal (two directions) and 1.0g Vertical, far exceed the design basis for SONGS and the historical seismic activity. Furthermore, the seismic activity within the vicinity of SONGS was most recently evaluated in 2010 in response to the California Energy Commission's (CEC) 2008 Report, "An Assessment of California's Nuclear Power Plants: AB1632 Report." The SCE response concluded that the results from the 2010 analysis are comparable to the previous analysis conducted in 1995, indicating that the assessment of SONGS seismic hazard risk has not changed.