

**San Onofre Nuclear Generating Station**  
**Irradiated Fuel Management Plan**  
**Executive Summary**

Regulation

Paragraph 50.54(bb) of Title 10, Energy, of the Code of Federal Regulations states that nuclear power reactors licensed by the Nuclear Regulatory Commission (NRC) shall submit written notification to the Commission for its review and approval of the program by which the licensee intends to manage and provide funding for the management of all irradiated fuel at the reactor following the permanent cessation of operation of the reactor until title to the irradiated fuel and possession of the fuel is transferred to the Secretary of Energy for its ultimate disposal in a repository. Written notification is required within two years of the permanent cessation of operation. There is no standard format and content or other regulatory guidance on the Irradiated Fuel Management Plan (IFMP).

Plan Overview

Southern California Edison (SCE) intends to maintain both wet and dry storage spent fuel until the Independent Spent Fuel Storage Facility (ISFSI) can be expanded to accommodate the remaining inventory in the Units 2 and 3 Spent Fuel Pools. As soon as safe and practical, the spent fuel will be transferred to dry storage. The transfer is planned to be complete no later than 2019. Efforts are underway to accelerate the transfer.

Dry storage will continue until the Department of Energy (DOE) has a repository available to accept the spent fuel. For the purposes of estimating cost, the DOE facility is assumed to open in 2024 (as noted in Reference 13 of the IFMP), with the transfer of the SONGS spent fuel complete by 2049. Once transferred to DOE, the ISFSI will be demolished and site restoration and license termination is planned to be complete by 2051. This date is well in advance of the 60-year maximum allowed by NRC regulation, until 2073 for SONGS.

NRC Process

NRC reviews most submittals in accordance with standard processes. The submittal is reviewed for meeting the requirements. Once accepted, the submittal undergoes a technical review. During its technical review the NRC may request clarification to the document or additional information through "Requests for Additional Information" (RAIs). The licensee provides a written response to each RAI. The NRC will then prepare a Safety Evaluation to document the disposition of the submittal. NRC past practice has been to review the IFMP for 'reasonableness.' Most of the discussion and SE content have centered on the associated cost information either in the IFMP or the more detailed site specific Decommissioning Cost Estimate. Since cost estimates are part of the Post Shutdown Decommissioning Activities Report (PSDAR) they are generally completed on its schedule which is nominally 90 days. Some recent reviews have taken longer to disposition public comments made at the PSDAR Public Meeting held around 60 days into the 90 day period.