

SCE Responses to Public Comments PSDAR, EIE, DCE, and IFMP

1. **Question:** Is spending information for Unit 1 decommissioning still available? What system is being used to track the spending and work performed during decommissioning for Units 2 and 3? Will the information be retrievable in the future?

Response: The accounting system used during Unit 1 decommissioning through 2008 was the Corporate Accounting and Records System (CARS). In 2008, SCE replaced the forty-year old CARS system with the integrated SAP system and a project management tool known as U1DECOM. Both SAP and U1DECOM contain the recorded costs from CARS. However, due to the retirement of the CARS system, SCE does not have the ability to perform certain analyses relating to U1 decommissioning costs, such as determining how contingency was applied to various aspects of the project. Notwithstanding certain limitations such as this, all recorded costs are available.

SAP is also the accounting system used to track Units 2 and 3 decommissioning costs. SCE will also use a project management tool called DCMS to track Units 2 and 3 decommissioning spending and work performed.

2. **Question:** “The major portions of the decommissioning process occur in three of the “decon” group of tasks, for a total of nearly half the total budget and encompassing over nine years, followed by two “Site Restoration” tasks, which comprise seven more years. Together, these five line items comprise about \$2.4 billion. These tasks should be broken down much further to allow the project to be tracked by oversight groups.

Please provide more detail on these line items on a year-by-year and subproject-by-subproject basis, including cost estimates for each subproject, and total proposed to be spent each.”

Response: The DCE, Appendix C, breaks these subject periods down into discreet summary activities which provide more detail.

3. **Question:** “When and how much money does SCE plan to request to be provided from the decommissioning project using the Advice Letter process.”

Response: Decommissioning Trusts were established by the CPUC in the early 1980s. In November 2013, SCE submitted an advice letter requesting Commission approval for interim access to the trusts, until such time as the Commission approves SCE’s decommissioning costs application for a process for permanent access to the trusts. SCE also requested that the Commission approve a process authorizing SCE to submit periodic (e.g. annual) advice letters requesting access to the trusts and reporting decommissioning costs and work progress. SCE expects to file the decommissioning costs application at the CPUC before year-end. Any expenses reimbursed from the decommissioning trusts – whether on an interim or permanent basis – will also require a full prudence review before the CPUC; a process that will be open to the public.

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4. **Question:** “In the Nuclear Decommissioning Cost Triennial Proceeding, SCE testified that you were not planning on comparing the detailed cost estimate with the actual spending levels. What type of oversight will be used to ensure prudent spending?”

Response: This question does not accurately characterize SCE’s testimony. In fact, the CPUC will review recorded SCE expenditures to be sure SCE is managing the work prudently. SCE will provide comparisons of actual decommissioning spending levels to estimated costs, consistent with the approach used by PG&E for the ongoing decommissioning of the Humboldt Bay Nuclear Power Plant Unit 3.

5. **Question:** “Does SCE already have a contract with Waste Control Specialists in Andrews, Texas, to accommodate all the waste other than the high-level waste stored in the dry-cask storage facility on site?”

Response: Yes, SCE has a contract with WCS for the processing and disposal of low level radioactive waste. The contract will be reviewed periodically to ensure its terms remain competitive.

6. **Question:** “The SONGS Unit 1 Reactor Pressure Vessel still exists on site and there have been serious technical problems associated with segmentation and transportation. What are the exact plans to deal with all the reactor pressure vessels?”

Response: During the decommissioning of Units 2 and 3, the disposition of the Unit 1 reactor vessel will also be addressed. Disposition of the Unit 1 reactor vessel is currently proposed to be within the scope of the Decommissioning Operations Contractor, which likely will be retained sometime in 2015. Thus, the detailed plans for the reactor pressure vessel(s) have not yet been developed.

7. **Question:** “Why is the transmission line switchyard not included in the decommissioning project?”

Response: The switchyard will not be decommissioned because it remains a vital interconnect between the SCE and SDG&E grids. Certain activities and modifications related to the switchyard are included in the decommissioning project scope, but the switchyard is not being dismantled at this time due to its importance to the grid by providing essential service to utility customers.

8. **Question:** “SCE announced to the NRC on June 12, 2013 that it would permanently cease operations. Why was the first meeting of the CEP delayed a year until (after) many decisions of the PSDAR were made?”

Response: In the nine months between the time San Onofre announced its shutdown in June 2013, and the first CEP meeting in March 2014, the focus of the station was to transfer the fuel out of the reactors and into the spent fuel pools and reduce station staffing.

The CEP was formed in March 2014, with ample time for SCE to obtain feedback on the PSDAR. A workshop on the development of the PSDAR (and other regulatory documents) was held on July

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17, 2014, to provide panel members with a depth of knowledge on the subject. A draft of the PSDAR was shared with members of the CEP on August 1. Then, on August 28, 2014, SCE provided the CEP with an in-depth review of the PSDAR at a CEP Regular Meeting. After receiving feedback from the CEP, SCE submitted the PSDAR to the NRC on September 23, 2014.

Key NRC submittals, such as the PSDAR, IFMP and DCE were not finalized until after the panel was formed such that SCE was able to obtain feedback on draft documents prior to submittal.

9. Question: “Who decided on DECON instead of SAFSTOR for SONGS? “

Response: SCE decided to pursue DECON in a timely manner and believes that it is in the best interest of the public and SCE customers to proceed promptly and safely with decommissioning. With the current plan, all spent fuel will be removed from the spent fuel pools at SONGS by 2019 and major decontamination and dismantlement will be complete by the end of 2025. After that, only the Independent Spent Fuel Storage Installation (ISFSI) will remain until the fuel is removed from the site by the U.S. Department of Energy.

10. Question: “Decontamination Period 2 includes design and installation of Spent Fuel Pool Islanding, control Room relocation, and Security Modifications. Will this be located near the expanded ISFSI pad? Does it include new ocean pipes? Can a new system without the ocean used for cooling be built for a better future emergency plan? “

Response: Spent Fuel Pool Islanding refers to a process through which cooling is accomplished without the use of ocean water. Therefore new ocean conduits will not be installed to support spent fuel pool islanding.

11. Question: “Must the spent fuel bridge crane be shipped away when the spent fuel pools are dismantled and removed?”

Response: The spent fuel bridge cranes are located inside of the Spent Fuel Pool building and will be dismantled and decommissioned, along with the fuel pool, after all the spent fuel has been placed in dry cask storage.

12. Question: “Spent Nuclear Fuel Period D&D ISFSI Demolition seems to take place after SCE gets its License termination. What funds are saved thirty years from now of the Trust? Who is responsible to create the plan? Who pays for it? Who oversees it? In 2048 or later?”

Response: Decontamination and Demolition of the ISFSI occurs after the spent fuel is removed from the site by the U.S. Department of Energy. The costs to decommission the ISFSI, as well as the costs to perform final site restoration as required by the site easement contract(s), are included in the Decommissioning Cost Estimate. Each of the SONGS’ participants has accumulated funds for these purposes, in addition to License Termination and Spent Fuel

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Management activities. SCE, as the licensee, continues to have the responsibility to operate and maintain the ISFSI.

13. **Question:** “What expert on marine biology has looked at the request to leave the intake outtake pipes that are 18 feet in diameter and 3200 feet extended into the ocean? We need a new non-ocean system to cool the pools. 50 million gallons a day for the next decade is not acceptable. The goal is by 2019, but what guarantees do we have? And who says it’s better for the ocean to leave them than remove them? Or is it just much less expensive?”

Response: SCE plans to install Spent Fuel Pool Islanding by 2015, which will eliminate the use of the intake and outfall pipes for spent fuel pool cooling. The final disposition of the ocean conduits will be determined by the California State Lands Commission (SLC) pursuant to the lease for the conduits. SLC will conduct an environmental review to evaluate the potential impacts of the various alternatives, including full removal and abandonment in place, prior to making its decision pursuant to the California Environmental Quality Act (CEQA).

14. **Question:** “Demolish safety equipment is in site restoration 4. If the nuclear fuel is still there why would we demolish the safety equipment?”

Response: Site Restoration Period 4 includes the Decontamination & Dismantlement of the Safety Equipment Building, not all remaining safety equipment. All equipment required to safely store spent fuel in dry cask storage will continue to be used and maintained until the spent fuel is removed from the site.

15. **Question:** “Also mentioned on page 13 is removal of all subsurface structures. What is three feet below grade? Is a structure remaining that is deeper? Is any of the subsurface structure contaminated? This PSDAR does not mention unit 1. The NRC says SONGS Unit 1 decommissioning is still In Progress. The latest SCE meeting said the new expanded ISFSI (dry casks) storage will be built on the top of where Unit 1 used to be, presumably where Unit 1 subsurface structures still exist- Why? Has anyone checked to see what has been happening underground since 1998?”

Response: The DCE assumes the removal of all substructures. However, other decommissioned nuclear plants have typically found that removal of structures to an average of three feet below the ground elevation removes radiological contamination allowing for unrestricted use of land. The ultimate depth of removal will be dependent on an acceptable radiological profile as determined by the NRC, the State of California and the Department of the Navy.

The PSDAR was written to address Units 2 and 3. The decommissioning of Unit 1 is not complete and the license to possess Unit 1 fuel is still active. The ISFSI expansion will be constructed over Unit 1. When the ISFSI is demolished, it will be decommissioned to the same standard as the area that contained Units 2 and 3.

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Monitoring wells are installed in the former Unit 1 area .

16. **Question:** “Why can’t the Trust Fund be used to build an above ground Temporary Consolidation Monitored Retrievable Storage ISFSI pad in Texas or Utah to accept our 150 dry casks.”

Response: As discussed during the July 17, 2014 CEP Workshop, a variety of options for spent fuel location was considered by SCE. The nuclear industry has made several attempts to site Monitored Retrievable Storage facilities during the past several decades, with no success. It would be purely speculative to assume that the siting of a future facility will be any more successful or expeditious. As stewards of our customers’ decommissioning funds, SCE and SONGS co-owners, therefore, must base the decommissioning plans and cost estimates on outcomes with the greatest possible certainty. The planned approach to manage used fuel for San Onofre also assures safety for the public, workers, and the natural environment.

17. **Question:** “The plan would use the nearly two billion dollars of the Trust Fund for both non-radiological decommissioning costs 1)site restoration and 2)termination of license to be completed largely by 2035. Who pays once a deficit happens? SCE for poor planning or the ratepayer and or taxpayer? Who pays for a spent fuel exit plan and continued monitoring or leaking casks accidents or any of the shortfalls possible in SCE planning?”

Response: SCE has used best practices to estimate the cost to decommission San Onofre. SCE currently believes that the trust funds are sufficiently funded based upon the current estimate of decommissioning costs, current level of funding of the Nuclear Decommissioning Trusts, and projected financial market conditions. The other co-owners, or “participants” in decommissioning, are in the process of validating their trust balances as compared to cost estimates. If unforeseen developments result in costs that exceed funding levels, SCE and the decommissioning participants would need to work with the CPUC to determine an appropriate source of additional funds.

18. **Question:** “Where is the IFMP Irradiated Fuel Management Plan? Who has access and is reviewing it?”

Response: Spent Fuel Management was the focus of a CEP workshop on May 6, 2014 as a precursor to a CEP Regular Meeting on May 22, 2014 at which SCE and the CEP engaged in an in-depth review of the San Onofre Irradiated Fuel Management Plan (IFMP). SCE received feedback from the CEP on the IFMP and the current version of the submittal is posted to the SONGS Community website at http://www.songscommunity.com/docs/051514_IFMP.pdf

19. **Question:** “What is the location of the money available for the three re-licensing cycles of the spent fuel casks with the NRC every 20 years. Is it the vendor’s responsibility?”

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Response: SCE, as the licensee, continues to have the responsibility to ensure the spent fuel casks are licensed. The DCE contains sufficient funds to address re-licensing.