

Tim and Dan:

My comments to the three SCE documents are below:

- 1.) As requested at the last CEP meeting, can you please identify the differences in assumptions in the three documents from the SONGS 1 equivalents?
- 2.) Of the three, I believe the PSDAR is the most important from an operational point of view. The PSDAR lays out how you will operate the decommissioning project until you file the License Termination Plan (the SONGS LTP is at least 3 years away). Tearing the plant down is actually the easiest part of decommissioning. A decommissioning project is set up for success or failure based on how you handle the paper in the first 2 years. You have to cut the FSAR from over 10, 2" volumes to a maybe half inch document that deals with fuel only. You have to get rid of the clearance orders in Passport that are still open and not needed. You have to figure out how you are going to reclassify systems. You have to prepare a number of license submittals to the NRC including amendments and exemptions. My question is --- what can you do in negotiating with the Navy for keeping the intake and outflow piping and non-radioactives structures below 3 foot grade in place with backfill? That is the industry standard.
- 3.) PSDAR Page 14 Site Restoration Period 6 should not be allowed while any canisters remain at SONGS. Right now it looks as if 2024 is the planned time to remove everything on site except an ISFSI cement pad with 150 dry nuclear waste casks sitting on it. The seawall pedestrian walkway, roads, parking lot, rail road tracks all go. The dry casks are planned to sit waiting without protection or monitoring until 2048? No buildings roads parking lot or railroad tracks!?
- 4.) EIS Page 30 – Transportation. Can you please inform the CEP of DOE's strategy for moving used fuel? I believe it includes a DOE canister for transportation to meet the final HLW storage location licensing requirements – not the current utility owned canisters. The fuel is to be transferred from each utility canister to the DOE canister for transportation --- is that true or did DOE not complete this analysis and planning yet?

Best regards,

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