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SCE 15 IEPR-12 Comments on Lead Commissioner Workshop on Nuclear Power Plant Issues

Additional submitted attachment is included below.

SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

Manuel Alvarez
Manager, Regulatory Policy and Affairs

May 11, 2015

California Energy Commission
Docket Office, MS-4
Re: Docket No. 15-IEPR-12
1516 Ninth Street
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Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 15-IEPR-12: Lead Commissioner Workshop on Nuclear Power Plant Issues

Dear Commissioner McAllister:

On April 27, 2015, the California Energy Commission (Energy Commission) held a Lead Commissioner Workshop on Nuclear Power Plant Issues ("the Workshop") as part of the 2015 Integrated Energy Policy Report ("IEPR") Proceeding. Southern California Edison (SCE) participated in the Workshop by providing an update on its decommissioning efforts at San Onofre Nuclear Generating Station (SONGS)[1], and SCE appreciates the opportunity to provide these additional written comments.

As noted during the Workshop, SCE is committed to safely decommissioning SONGS, and to leaving the community better off as a result of having been home to SONGS for 40 years. SCE is determined to complete safe decommissioning as expeditiously and cost efficiently as possible, to spending funds wisely, and returning any unused monies to its ratepayers. SCE's immediate goal is to safely move the power plant's spent fuel into dry cask storage as quickly and as carefully as possible until the government creates the long-term storage option that it has committed to implement. SCE will continue to urge the government and other stakeholders to find a solution to provide the timely removal of spent nuclear fuel from the San Onofre site. SCE is also committed to engaging the community in an inclusive, forward-thinking process that involves diverse stakeholders.

During the Workshop, SCE received several questions regarding its decommissioning efforts during its presentation.[2] These questions and SCE's responses are outlined below:

[1] SCE presentation: "Decommissioning San Onofre Nuclear Generating Station," April 27, 2015; *see:* http://docketpublic.energy.ca.gov/PublicDocuments/15-IEPR-12/TN204325_20150423T150912_Decommissioning_San_Onofre_Nuclear_Generating_Station.pptx

[2] Questions were received by Manuel Camargo during the CEC IEPR workshop on Monday, April 27, 2015.

Question 1: **When will SCE's seismic studies be complete?**

Response 1: SCE seismic field studies are complete and the associated analysis is forecasted to be completed by the end of 2015. SCE will provide the seismic studies and analysis to the California Public Utilities Commission (CPUC) and the Energy Commission upon completion.

Question 2: What are the lessons learned from decommissioning Unit 1?

Response 2: SCE learned many useful lessons from the successful decommissioning of Unit 1 and, in so doing, has demonstrated its ability to perform a large-scale decommissioning project with a superior industrial safety record, while maintaining worker exposures to radiation below estimated levels.

Among these lessons, SCE demonstrated the successful implementation of many of the technologies that will be used in the decommissioning of Units 2 & 3. A few key lessons learned from Unit 1 include: (1) effective benchmarking of other decommissioning projects, and (2) employing the use of industry experts in certain aspects of decommissioning. SCE also determined that the material take-off calculations that were used in prior decommissioning cost estimates do not necessarily equate to the volumes of materials that must be shipped to radioactive waste disposal facilities, and thereby learned how to more accurately estimate low level radioactive waste packaging, shipping, and disposal costs. SCE has taken into consideration the lessons learned from the SONGS Unit 1 decommissioning in its planning for the Unit 2 & 3 decommissioning process. While SCE's decommissioning of SONGS Unit 1 has been successful, SCE is continuing to evaluate lessons learned in order to apply them to the decommissioning of Units 2 & 3, including evaluating the use of a Decommissioning General Contractor to address these lessons learned.

Question 3: How long has dry cask storage been in use in the U.S. by commercial nuclear power plants?

Response 3: Dry casks storage has been in use in the United States for nearly 30 years by commercial nuclear plants. The first dry storage installation was licensed by the NRC in 1986 at the Surry Nuclear Power Plant in Virginia. There is additional information on dry storage on the NRC website at http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/dry-cask-storage.html.

Question 4: What is SCE's use of ocean water for once-through cooling?

Response 4: SCE's current use of ocean water at SONGS is less than 4% of the amount used when the plant was operating. With SONGS permanently retired, the total volume of ocean water currently used for cooling is approximately 98 million gallons/day (MGD). When SONGS was fully operational the total volume of ocean water use was approximately 2,500 MGD.

In addition to the questions received during the Workshop, the Energy Commission also requested that SCE provide a status update on the following 2013 IEPR Recommendation:

***2013 IEPR Recommendation*: SCE should submit a decommissioning plan to the NRC and proceed swiftly with decommissioning, providing progress updated to the Energy Commission until decommissioning is completed.**

Response: SCE formally notified the Nuclear Regulatory Commission (NRC) on June 12, 2013, that it had permanently ceased operation of Units 2 and 3 on June 7, 2013. The notification, called a Certification of Permanent Cessation of Power Operations, set the stage for SCE to begin planning for decommissioning.

The NRC has strict rules governing nuclear plant decommissioning, involving cleanup of radioactively contaminated plant systems and structures, and the removal of the radioactive fuel. Longer term, the process calls for cleaning up radioactivity to allow for unrestricted use of the land. The NRC requires that decommissioning be completed within 60 years, but SCE plans to complete this work within 20 years. The used fuel will be stored safely on-site until the federal government fulfills its contractual obligation to open a permanent spent nuclear fuel storage facility.

SCE has developed a detailed plan that spells out specific decommissioning activities and schedules, cost estimates and potential environmental impacts. This plan, called a Post-Shutdown Decommissioning Activities Report, was submitted to the NRC in September 2014 and shared with state officials.

SCE will continue to update both the CPUC and the Energy Commission as decommissioning progresses.

In conclusion, SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission. Please do not hesitate to contact me at (916) 441-2369 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Manuel Alvarez