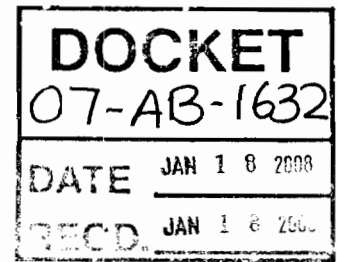


January 18, 2008

Barbara Byron
California Energy Commission
Executive Office
1516 Ninth Street, MS-39
Sacramento, California 95814



Email: BByron@energy.state.ca.us

RE: AB1632 – Nuclear Power Plant Assessment (Docket No. 07-AB-1632):
Additional Studies Identified by SCE for Consideration in the AB 1632 Nuclear
Power Plant Assessment

Southern California Edison (SCE) has identified the following studies that should be considered during the California Energy Commission's Nuclear Power Plant Assessment as required by AB1632.

Task 2: Seismic Vulnerability Assessment

- "Seismic Hazard at San Onofre Nuclear Generating Station," Risk Engineering Inc., August 25, 1995
- "Seismic Design Basis Assessment," from Dwight E. Nunn, SCE, to U.S. NRC, December 27, 2001
- "San Onofre Nuclear Generating Station, Units 2 and 3, Seismic Hazard Study of Postulated Blind Thrust Faults," Geomatrix Consultants, GeoPentech, December 26, 2001
- "San Onofre Nuclear Generating Station, Units 2 and 3 – Seismic Design Basis Assessment (TAC Nos. MB2466 and MB2467)," from Alan B. Wang, NRC, to Harold B. Ray, SCE, September 24, 2002
- SONGS Units 2 and 3 Updated Final Safety Analysis Report section 2.4.6 "Probable Maximum Tsunami Flooding"

The above documents are provided on the enclosed CD.

Task 3: Plant Aging Vulnerability Assessment

The first three items are studies that look at the generic effects of aging on the safe operation of commercial nuclear power plants. The documents can be found at <http://www.nrc.gov/reactors/operating/licensing/renewal/guidance.html>

- NUREG-1437 "Generic Environmental Impact Statement," May 1996
- NUREG-1801 "Generic Aging Lessons Learned (GALL) Report," Rev 1, September 2005
- NUREG/CR-6679, BNL-NUREG-52587 "Assessment of Age-Related Degradation of Structures and Passive Components for U.S. Nuclear Power Plants," August 2000

- 2006 General Rate Case (GRC) (A.04-12-014) application testimony filed before the CPUC. Funding requesting funding to address SONGS' aging workforce was approved in D.06-05-016. Relevant pages are provided on the CD.
- 2009 GRC application (A.07-11-011) testimony filed before the CPUC in July 2007. Relevant pages are provided on the CD.
- "Nuclear Energy Industry Initiatives Target Looming Shortage of Skilled Workers," Nuclear Energy Institute Fact Sheet. See <http://www.nei.org/resourcesandstats/documentlibrary/newplants/factsheet/shortageofskilledworkers/>
- "San Onofre, Nuclear Generating Station Units 2 And 3 – NRC Problem Identification and Resolution Inspection Report 05000361/2006013 and 05000362/2006013," NRC Inspection Report, ADAMS Accession Number ML063110383, November 1, 2006. Included on the CD
- "Meeting Summary – Discussion of Safety Conscious Work Environment and Nuclear Safety Culture at San Onofre," ADAMS Accession Number ML061670124, June 8, 2006. Included on the CD
- The NRC's most recent summary of plant performance can be found by selecting "San Onofre 2" or "San Onofre 3" from <http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html#section2>

Task 4: Impact of a Major Disruption

The Electric Power Research Institute (EPRI) has also performed various studies among which are several that consider the effects of natural disasters such as earthquakes, floods, and high winds on electric power supply and distribution. Since SCE has not reviewed the documents, we cannot comment on their relevance to Task 4 of the Draft Study Plan.

Task 5: Nuclear Waste Accumulation and Assessment

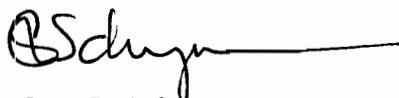
- Nuclear Energy Institute Fact sheets
<http://www.nei.org/keyissues/nuclearwastedisposal/factsheets/>
- "U.S. State-by-State Commercial Nuclear Used Fuel and Payments to the Nuclear Waste Fund," Nuclear Energy Institute Fact sheet. See <http://www.nei.org/resourcesandstats/documentlibrary/nuclearwastedisposal/graphicsandcharts/usstatebystateusedfuelandpaymentstonwf/>

Task 6: Assessment of Other Nuclear Power Policy and Planning Issues

- "Greenhouse Gas Emissions of Electricity Generation Chains – Assessing the Difference," by Spider, J., Langlois, L., and Hamilton, B, 2000, International Atomic Energy Agency Bulletin 42, 2. See <http://www.iaea.org/Publications/Magazines/Bulletin/Bull422/article4.pdf>
- "Final Report of the Marine Review Committee to the California Coastal Commission," August 1989, MRC Document No. 89-02. Included on the CD

SCE has been using nuclear power to generate safe, cost-effective, reliable electricity for its customers since 1968. Nuclear power can and should be part of California's generation portfolio to lower greenhouse gas emissions. If there is additional information that the CEC requires, please contact Manuel Alvarez (916-441-2369) or Caroline McAndrews (949-368-9307). SCE looks forward to participating in future workshops on AB1632, including one to review the draft assessment report prior to its issuance.

Very truly yours,

A handwritten signature in black ink, appearing to read "G. Schoonyan", followed by a long horizontal line extending to the right.

Gary L. Schoonyan

CD DIRECTORY

- SONGS Seismic Hazard Report 1995
 - SONGS Seismic Hazard Report 1995.pdf
 - SONGS Seismic Hazard Report 1995 - Appendix A.pdf
 - SONGS Seismic Hazard Report 1995 - Appendix B and C.pdf
 - SONGS Seismic Hazard Report 1995 - Appendix D.pdf
 - SONGS Seismic Hazard Report 1995 - Appendix E.pdf
- SONGS Seismic Hazard Report 2001
 - SONGS Seismic Report_Final 12-26-2001.pdf
 - Figures for Section 2.pdf
 - Figures for Section 3.pdf
 - Figures for Section 4.pdf
 - Tables for Section 3 and 4.pdf
- SCE to NRC Letter dated 12-27-2001.pdf
- NRC to SCE Letter dated 9-24-2002.pdf
- Tsunami
 - SONGS Units 2 and 3 Updated Final Safety Analysis Report section 2.4.6 “Probable Maximum Tsunami Flooding” (UFSAR Section 2.4.6 – Tsunami.pdf)
 - UFSAR Section 2.4 – Figure 2.4-27.pdf
 - UFSAR Section 2.4 – Figure 2.4-28.pdf
 - UFSAR Section 2.4 – Figure 2.4-29.pdf
- Workforce
 - 2006 GRC testimony.pdf
 - 2009 GRC testimony.pdf
- Nuclear Safety Culture
 - NRC_SONGS 2006 Safety Culture meeting.pdf
 - Inspection Report 2006013.pdf
- 1989 Marine Review Committee Final Report.pdf