

June 4, 2015

Dear Community Engagement Panel members:

I write to share with you today that the Nuclear Regulatory Commission (NRC) has taken steps that will allow us to proceed with implementing our revised emergency plan at San Onofre. While the emergency plan will be updated to better reflect the plant's permanent shutdown, we remain steadfast in our commitment to protect the health and safety of the public and our employees.

Specifically, the NRC has issued certain exemptions for San Onofre from emergency preparedness requirements that are designed for operating nuclear plants. We expect the NRC will shortly issue two related license amendments to support the emergency planning revisions. With these two approvals in place, Southern California Edison (SCE) will move forward to implement its new Permanently Defueled Emergency Plan.

The NRC's decision is a culmination of more than a year of review of San Onofre's proposed emergency plan. The plan was one of five key NRC regulatory submittals briefed at our first CEP meeting on March 25, 2014. Since then, we have updated the CEP at every meeting, including an in-depth discussion at the October 9 meeting, with presentations from the NRC, the Interjurisdictional Planning Committee (IPC), which coordinates emergency planning in the region, and SCE. I appreciate the time and thoughtful dialogue from CEP members on this important topic. Please note that these proposed changes are related to the emergency preparedness process at the station, and do not have an impact on the plant's overall physical security plans.

We recognize that the language surrounding these regulatory approvals can be confusing. Currently, the NRC only has emergency planning rules for operating nuclear plants. In the 1990s, the NRC began developing rules for reactors transitioning to decommissioning. The rules, however, were not finalized before the 9/11 terrorist attacks and were postponed while the NRC focused its resources on strengthening security requirements. As a result, the NRC directed that changes to emergency planning requirements for decommissioning reactors be handled through exemption requests until the agency completed the rulemaking. In December 2013, the NRC drafted interim guidance to help its staff evaluate emergency plan exemption requests. SCE prepared and submitted its request in early 2014 following this guidance.

Emergency plan changes are appropriate because most potential accidents related to an operating plant are no longer possible at shutdown nuclear plants such as San Onofre where fuel has been removed from the reactor. However, the revised emergency plan will maintain many of our current emergency planning elements, including:

- An emergency plan staff trained to address unanticipated events for a permanently defueled facility
- Radiological and environmental monitoring at the site
- Close coordination and communication with our off-site partners and ongoing participation in the IPC
- Frequent on-site emergency preparedness drills, including some with our off-site partners
- Routine fire, medical and emergency communication drills with off-site partners
- Routine inspections by the NRC

With the reduced radiological risk at the station, we will no longer need to maintain pre-planned, off-site radiological emergency preparedness plans or the 10-mile emergency planning zone around the plant. However, as noted above, SCE will continue to coordinate with our off-site partners, and will work with them to address issues through their all hazards plans governed by the Federal Emergency Management Agency. Additionally, the NRC has determined that in the unlikely event of losing cooling in the spent fuel pools, there is sufficient time for our trained, dedicated staff to take appropriate actions at the plant, as well as notify local governments. The community alert sirens, while no longer needed at San Onofre, will remain in place through 2019 for other use by local jurisdictions and testing will continue to validate their readiness.

To gather feedback and ensure our partners are fully informed, the revised emergency plan was reviewed with the IPC. In addition, the NRC evaluated public comments as part of its year-long review of the revised plan. The NRC has approved similar plans for other decommissioning nuclear plants including Kewaunee in Wisconsin and Crystal River in Florida.

The safety of the community and our employees remains our highest priority as we move to a new emergency preparedness posture that is appropriate for a retired nuclear plant. We are updating the SONGScommunity.com website to reflect the emergency plan changes approved by the NRC.

If you have questions, please feel free to contact me. I would be happy to discuss the emergency plan changes in more detail or provide you with any additional information.

Regards,

