

QUESTIONS AND RESPONSES FROM THE 3RD QUARTER CEP MEETING ON AUG. 22, 2019

How We Answer Questions:

- Questions directed to SCE are answered below. If we receive a question that is directed to another agency, such as the Nuclear Regulatory Commission, we will forward those to the NRC
- The more specific the question, the better answer we can provide
- Members of the public who submit questions will only be identified by first name and last name initial
- Similar questions are combined, along with the names of the submitters
- Multiple question within one submission may be separated for clarity into individual answers
- SCE may restate submitted questions for clarity and a full list of un-redacted questions will be provided
- The term “Answer Pending” is used when information is not yet available
- **Note:** All of the questions and requests below were from CEP officers during the 3Q CEP meeting on August 22, 2019

DOUBLE WALLED CANISTERS

1. **Provide more information on the “double walled” canisters SCE assessed in making our dry cask storage vendor selection.**

Information regarding double walled canisters is available on the SONGScommunity.com website. A link to the “**Overview of Dry Spent Fuel Storage at San Onofre Nuclear Generating Station**” is available [here](#).

CANISTER INSPECTIONS

2. **Provide more information on “risk driven” inspections (to better explain the basis of why SCE inspected 8 out of 29 canisters).**

The scope of the visual assessment is the accessible surfaces of the MPC shell and baseplate. The eight MPCs included were selected from a total of 29 loaded MPCs for the following reasons:

- 1) MPC serial number (S/N) 067 was involved in the Aug. 3, 2018, event when it was wedged on the divider shell shield ring;
- 2) MPC S/N 064 was documented as having made contact with the divider shell on July 22, 2018, during downloading operations; and,
- 3) The remaining six MPCs are located on different rows than the previous two MPCs. Different rows were selected to account for the drainage slope on the HOLTEC ISFSI pad and its potential effect on MPC vertical alignment during downloading operations. The MPCs selected were downloaded at varying times in the fuel transfer operation campaign. Due to allowable tolerances in the manufacturing process each MPC and pad location is unique.

A third-party statistical evaluation was performed based on the maximum wear mark depth observed for each MPC. A projection of an upper tolerance limit based on wear mark depth was established. Based on the results for the eight MPCs, this sample size yields a 95 percent probability,

with 95 percent confidence level, that wear marks would not be deeper than 0.035 inches. This maximum depth remains in compliance with all applicable ASME Boiler & Pressure Vessel Code requirements. The statistical evaluation method is consistent with the method described in Section 9.12 of NUREG-1745, "Applying Statistics," which applies a tolerance limit factor that is dependent on the sample size. Therefore the method implicitly accounts for statistical variations due to sample size.

Although not required, the sample size selection is consistent with the minimum sample size of eight from Table II-A of American National Standard, ANSI/ASQC Z1.4-2003, "Sampling Procedure and Tables for Inspection by Attributes."

ROBOTIC INSPECTIONS of TN/NUHOMS CANISTERS

3. Explain why the robot inspection, which only sees the bottom third or 40 percent the TN/NUHOMS canister is the right portion of the canister during a future meeting.

The inspection of the bottom portion of the canister only is a technological limit due to a very close fitting heat shield on the top portion of the canister. Another utility has used the 40% inspection to meet the regulatory requirement. It is considered to be generally representative of the rest of the canister. However, SCE and the industry recognizes that inspection of the entire canister is preferable and thus development of technology that will allow accessing the small space between the heat shield and the top of the canister is in progress. It is anticipated that this technology will be available before SCE performs the first inspection of a TN canister, in late 2021. Thus, SCE's first inspection of a TN canister at San Onofre will likely be of approximately the entire canister.

LOW LEVEL RADWASTE

4. Explain how much low level radioactive waste is still on site (being stored for shipment) and how much is expected to be shipped offsite in the future.

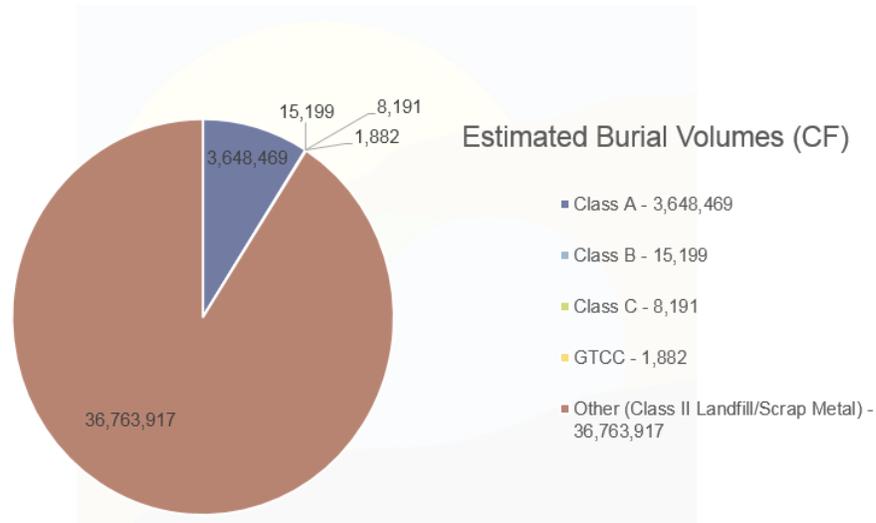
Refer to the Environmental Impact Report (EIR) Table 2-8 (page 2-57 or 135 in the pdf) for information about the volume of low level radioactive waste during decommissioning. A direct link is provided [here](#).

Additional information based on the Decommissioning Cost Estimate (DCE) is shown below.



Estimated Waste Types/Amounts

(Volumes noted from DCE)



CANISTER RETRIEVABILITY REQUIREMENTS

- 5. Explain the SCE and NRC requirements for extracting a canister from dry cask storage.**
Information on canister retrievability is available on the songscommunity.com website. A link to “**A Discussion of Retrievability Requirements for Dry Fuel Storage Systems at San Onofre Nuclear Generating Station**” is available [here](#).

NO LEAKING CANISTER IDENTIFIED IN U.S.

- 6. Determine if there are any leaking canisters nationwide.**
There have been no leaking canisters identified in the U.S. commercial nuclear fleet to date. If a canister was found to be leaking, a notification to the NRC would have to be made, and there would likely be a NRC Information Notice on the issue and there have been none issued, to date.

SELECTION OF HOLTEC DRY CASK STORAGE SYSTEM

- 7. Explain why Holtec was selected among the top three vendors, if they all met the required criteria.**

Information regarding the selection of the Holtec System is available on the SONGScommunity.com website. A link to the “**Overview of Dry Spent Fuel Storage at San Onofre Nuclear Generating Station**” is available [here](#).

SEA-LEVEL RISE

8. Provide a short summary regarding sea-level rise.

Refer to the Environmental Impact Report (EIR) section 8.1 for information on sea-level rise. A direct link is provided [here](#).