

SONGS

2019 Decommissioning Progress Report

June 15, 2020



Submitted in compliance with Special Condition 3 of the 2019 SONGS Units 2 and 3 Onshore
Decommissioning CDP (CDP 9-19-0194)

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List of Acronyms

APM	Applicant Proposed Measure
CCC	California Coastal Commission
CCR	California Code of Regulations
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CSLC	California State Lands Commission
DoN	U.S. Department of the Navy
EAB	Exclusion Area Boundary
EIR	Environmental Impact Report
FEIR	Final Environmental Impact Report
IMP	Inspection and Maintenance Program
ISFSI	Independent Spent Fuel Storage Installation
MM	Mitigation Measure
MMP	Mitigation Monitoring Program
NRC	U.S. Nuclear Regulatory Commission
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
SCE	Southern California Edison Company
SDG&E	San Diego Gas and Electric
SONGS	San Onofre Nuclear Generating Station
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
WDID	Wastewater Discharge Identification Number

1 Introduction

Southern California Edison Company (SCE), on behalf of itself and its decommissioning co-participants San Diego Gas & Electric, the City of Riverside, and the City of Anaheim, provides this 2019 Annual Progress Report (the Report) for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Onshore Decommissioning Project (the Project) in compliance with Special Condition 3 of the California Coastal Commission's (CCC) 2019 Coastal Development Permit (CDP) for the Project (the 2019 Onshore Decommissioning CDP), CDP 9-19-0194.

The Project is located on lands owned by the U.S. Department of the Navy (DoN) and operated as Marine Corps Base Camp Pendleton in San Diego County. Project work includes the decontamination and dismantlement of most above-grade structures at SONGS.

Special Condition 3 of the 2019 Onshore Decommissioning CDP states that SCE shall provide the CCC's Executive Director with annual progress reports by June 15 of each year, and that the reports shall include the following:

- a. A description of progress made in the previous year in conducting the Project;
- b. Results of any Final Status Surveys;
- c. Identification of any changes to the Project resulting from Final Status Surveys (e.g., identification of areas where additional structures or materials are required to be removed beyond that which is described in the [Final Environmental Impact Report (FEIR)] for the Project), including the volume(s) of material proposed to be removed and/or placed as backfill, method(s) of decommissioning and disposal, and identification of SONGS structures that would be proposed to remain following the identified change to the Project;
- d. Updates regarding the opportunities for long-term storage and/or disposal of nuclear waste, including specific discussion of potential opportunities to relocate waste currently stored in the [Independent Spent Fuel Storage Installation (ISFSI)] either elsewhere on the SONGS site or at offsite locations;
- e. Interactions with the [Nuclear Regulatory Commission (NRC)] regarding potential or proposed changes to the Exclusion Area;
- f. Any changes to project schedule that occurred or are anticipated in the subsequent year; and
- g. Assessment of the need for an amendment to this permit.

This Report provides information identified in categories "a" through "g," quoted above.

Given the fact that this Report describes progress made in 2019 and decommissioning work did not commence until February 24, 2020, the 2019 activities generally consisted of planning in preparation for commencement of work, including permitting, strategic planning, and submittal of pre-construction compliance documents. This Report provides an update on topics such as SCE's efforts to relocate spent nuclear fuel offsite, the proposed future changes to the SONGS Exclusion Area Boundary (EAB), and

anticipated schedule milestones for 2020. As described in more detail below, no Final Status Surveys were performed, no changes to the Project are recommended, and no CDP amendment is required.

2 2019 Annual Progress Report

SCE's 2019 progress regarding the items identified in Special Condition 3 is set forth below.

a. Description of Progress Made in Previous Year

No deconstruction work was performed during the 2019 calendar year as SCE received the CDP in late October 2019 and needed to satisfy various permitting requirements prior to commencing construction. On January 22, 2020, consistent with the Project's Mitigation Measure LU-2a, SCE transmitted a 30-day advance notice advising of SCE's intent to commence deconstruction activities no earlier than February 22, 2020.

During 2019, SCE's progress on the Project consisted of obtaining permits and engaging in preparation and planning for the start of work. A summary of these preparation and planning activities is below.

i. Permitting Overview – CSLC and CCC

To evaluate the potential environmental impacts of the Project, the California State Lands Commission (CSLC), as lead agency, prepared the FEIR for the Project pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 *et seq.*). The FEIR evaluated Project activities that would occur both onshore and offshore, as summarized in FEIR Table 2-1. On March 21, 2019, the CSLC certified the FEIR, issued a new general lease to SCE for the Project area, No. 6785.1, adopted a Mitigation Monitoring Program (MMP) as set forth in Exhibit C to the lease, and adopted a statement of overriding considerations. The MMP included Applicant Proposed Measures (APMs) and Mitigation Measures (MMs).

The CCC, as responsible agency, conducted its analysis of the potential impacts of the Project and found that the Project is consistent with the Coastal Act and CEQA Section 21080.5(d)(2)(A). On October 17, 2019, the CCC approved the 2019 Onshore Decommissioning CDP.

ii. Mitigation Measures and Special Condition Plans and Programs

To address the Project's potential environmental impacts, the CCC incorporated CSLC's mitigation measures, as modified by CCC's Special Conditions from the 2019 Onshore Decommissioning CDP. During 2019, SCE worked with CSLC and CCC to develop mitigation plans and programs in accordance with CSLC's APMs/MMs and CCC's Special Conditions for the Project.

In anticipation of the start of work for the Project, SCE submitted 17 plans and programs for agency review. All plans and programs were approved by January 2020.

A Storm Water Pollution Prevention Plan (SWPPP) was written for the Project for coverage under the Construction General Permit (CGP) State Water Resources Control Board (SWRCB) Order No. 2009-DWQ as amended by Orders Nos. 2010-0014-DWQ and 2012-0006-DWQ; General Permit No. CAS000002 as a Risk Level 2 Project.

SONGS is also currently covered by a National Pollutant Discharge Elimination System (NPDES) permit, Order No. R9-2015-0073, NPDES Permit No. CA0109282. The NPDES permit covers cooling water, wastewater effluent, and incidental waste streams that result from the operation of the facility. While it

does cover stormwater discharges generated in areas of industrial activity, it does not cover stormwater generated in areas disturbed by construction, demolition or decommissioning activities. Those activities are covered under the Construction General Permit (CGP) through the Project's SWPPP. A Wastewater Discharge Identification Number (WDID) of 9 37C388840 was assigned to the Project and the SWPPP was certified on December 6, 2019.

b. Results of Any Final Status Surveys

No Final Status Survey work was conducted in 2019 and thus, results of any such Final Status Surveys are not available. Final Status Surveys will be completed prior to the end of decommissioning work, anticipated to be 2028.

c. Identification of Any Changes to the Project from Final Status Surveys

No Final Status Surveys were conducted in 2019 and thus, no corresponding changes to the Project are proposed. Final Status Surveys will be completed prior to the end of decommissioning work, anticipated to be 2028.

d. Updates Regarding Opportunities for Long-Term Storage and/or Disposal of Nuclear Fuel

On August 25, 2017, SCE entered into a *Settlement Agreement Regarding Coastal Development Permit for Storage of San Onofre Spent Nuclear Fuel* (Settlement Agreement) to resolve a lawsuit regarding a 2015 coastal development permit authorizing the construction of an additional ISFSI at SONGS. As set forth in the Settlement Agreement, pending development of a permanent U.S. Department of Energy repository for the Spent Fuel, SCE will use "Commercially Reasonable" efforts, as defined by the Settlement Agreement, to relocate the Spent Fuel to an offsite storage or disposal facility.

SCE has documented its progress towards fulfilling the terms of the Settlement Agreement *via* the regular issuance of Settlement Agreement Implementation Status Reports.¹ SCE's efforts regarding opportunities for the long-term storage/disposal of nuclear fuel include the following:

i. Retention of the Experts Team

As part of the effort to relocate SONGS Spent Fuel to an offsite storage facility, SCE has retained a team of expert consultants (the "Experts Team") to advise SCE on issues related to this complex issue. The Experts Team includes one or more experts from each of the following fields: (1) nuclear engineering, (2) spent fuel facility siting and licensing, (3) spent fuel transportation, and (4) radiation detection and monitoring.

¹ These Implementation Status Reports may be found on the SONGS Community website here: <https://www.songscommunity.com/used-nuclear-fuel/used-fuel-reports>. Note, these Status Reports also describe SCE's 2017 request that the owners of the Palo Verde Nuclear Generating Station ("Palo Verde") consider a solicitation by SCE for an agreement to expand Palo Verde's ISFSI to store spent nuclear fuel from SONGS. SCE proposed a resolution calling for the approval of further, more detailed discussions between SCE and the other Palo Verde owners to evaluate the feasibility of licensing, constructing, and operating such an expanded facility on commercially reasonable terms. SCE's proposed resolution was not approved and no further action was taken.

SCE retained the following individuals to serve on the Experts Team:

1. Kristopher W. Cummings (Nuclear Engineering), a used fuel storage expert and nuclear engineer;
2. Thomas Isaacs (Spent Fuel Facility Siting and Licensing), a former director of the U.S. Department of Energy's Office of Policy and former advisor to the U.S. President's Blue Ribbon Commission on America's Nuclear Future (Blue Ribbon Commission);
3. Allison Macfarlane (Spent Fuel Siting and Licensing), former Chairman of the United States Nuclear Regulatory Commission (NRC) and former commissioner on the Blue Ribbon Commission;
4. Gary Lanthrum (Spent Fuel Transportation), a former director of the National Transportation Program for Yucca Mountain;
5. Richard C. Moore (Spent Fuel Transportation), a consultant specializing in transportation of radiological materials who works for the Western Interstate Energy Board and preparer of a report for the Blue Ribbon Commission on the relationship between state and federal governments on permitting issues, including transportation; and
6. Dr. Josephine Piccone (Radiation Detection and Monitoring), a former U.S. representative to the International Atomic Energy Agency (IAEA) Radiation Safety Standards Committee and a health physics and radiation control expert with regulatory compliance experience.

This Experts Team was engaged on March 8, 2018, and since that time and throughout 2019 their support of SCE's efforts has continued.

ii. Strategic Plan

To assess alternatives for relocating SONGS Spent Fuel to an offsite storage/disposal facility, SCE began developing a Strategic Plan (SP) in February 2019 with the support of SCE's Experts Team and a consortium of consultants headed by North Wind, Inc. (collectively North Wind). These efforts included the development and initial implementation of a external Stakeholder Engagement Plan, preliminary identification and analysis of potential alternatives for consideration, and discussions regarding the outline and format of the final Strategic Plan.

These and other efforts in support of the SP's development continued throughout 2019 and until the present. SCE and North Wind currently anticipate completing the SP by the end of 2020.

iii. Conceptual Transportation Plan

In addition to the SP, SCE is developing a Conceptual Transportation Plan (CTP) supporting the eventual transportation of the SONGS spent fuel to an offsite storage facility.

In consultation with the Experts Team, on October 11, 2019, SCE circulated its *San Onofre Nuclear Generating Station Request for Information in Support of the Development of a Conceptual Transportation Plan for the Relocation of Spent Nuclear Fuel to an Offsite Storage Facility* (CTP RFI). SCE expects the CTP to focus on logistical issues requiring consideration for the potential offsite transportation of SONGS spent nuclear fuel, including transportation alternatives, timelines, process regulations and lead times, and proposed equipment and procurement. SCE also expects the CTP to

discuss near and medium-term actions which may prudently be taken by SCE in order to prepare for the eventuality of shipping the SONGS spent nuclear fuel off-site.

Supported by the Experts Team, SCE ultimately selected a consortium of consultants led by North Wind to assist with the development of the CTP. SCE and North Wind currently anticipate completing the CTP by the end of 2020, in parallel with the development of the SP.

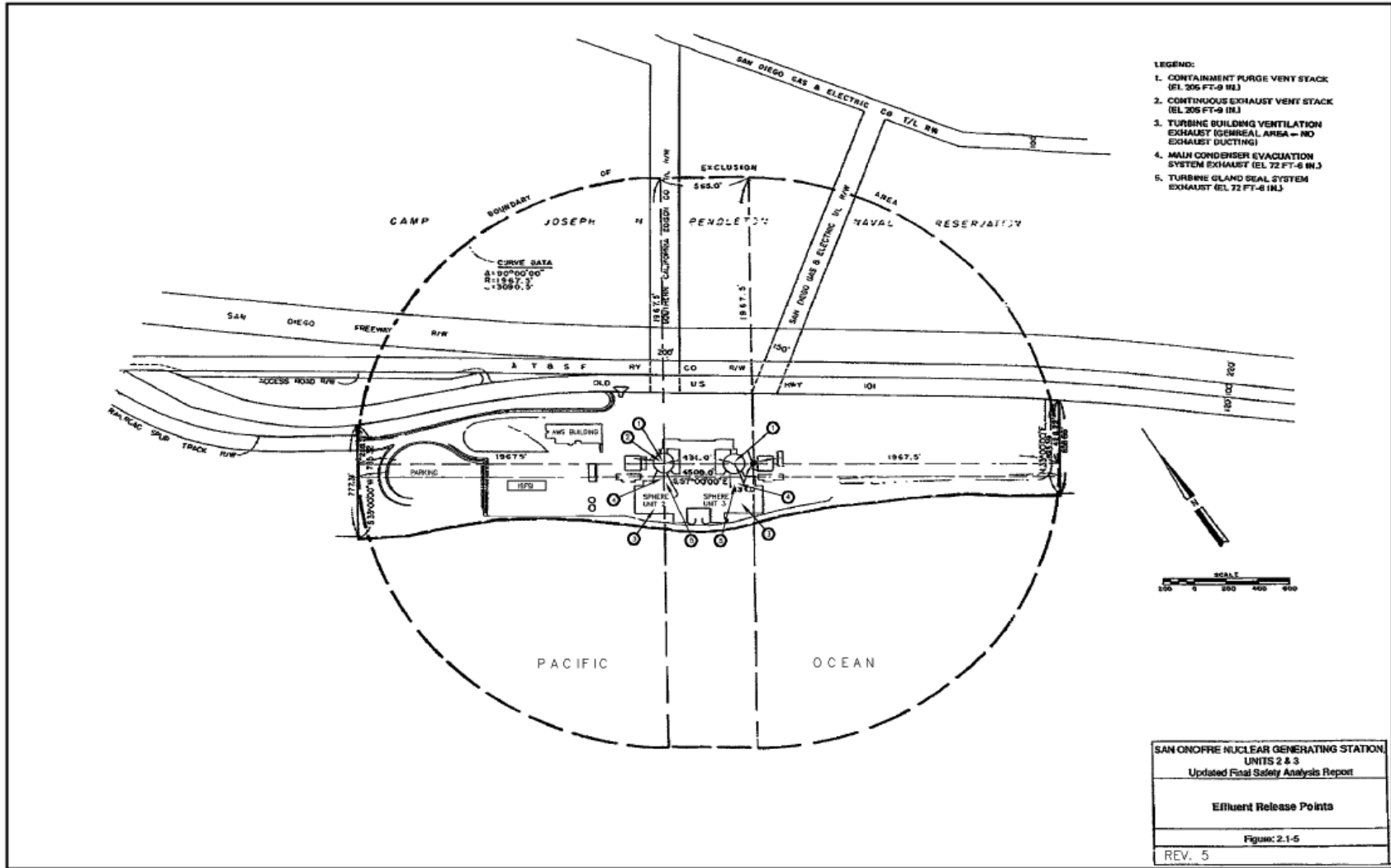
e. Potential or Proposed Changes to the Exclusion Area

No reductions in the Exclusionary Area Boundary² (EAB) have been completed at this time. Once fuel transfer operations (FTO) are complete and the SONGS NRC license changes have been implemented for “ISFSI Only” conditions, SCE will submit a License Amendment Request (LAR) to the NRC for a reduction in the EAB.

SCE currently anticipates that it will submit the LAR to the NRC in Q4 2020. If granted, the EAB would be reduced to an area consistent with ISFSI Only licensing requirements.

²The San Onofre Units 2 and 3 EAB is roughly formed by two semi-circles with radii of 1967.5 feet each, centered on the Unit 2 containment and a point 134 feet southeast of the Unit 3 containment, with a tangent connecting the landward arcs and the seawards arcs of the two semi-circles. The current EAB is delineated in Figure 2.1-5 of the [Defueled Safety Analysis Report](#), included here for convenient reference. At the northwest and southeast site boundaries, the EAB is tangential to, but does not exceed, the site boundary. There are no industrial, commercial, institutional, or residential structures within the EAB.

Figure 1. Current Exclusionary Area Boundary, as depicted in Figure 2.1-5 of SCE's [Defueled Safety Analysis Report](#)



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f. Changes to Project Schedule that Occurred or are Anticipated In 2020

No changes to the Project Schedule occurred in 2019.

In response to the COVID-19 pandemic, SCE implemented a SONGS-specific Pandemic Protocol with additional safety measures to protect workers’ health and safety.

Despite logistical and resource constraints related to the COVID-19 pandemic, SCE has prioritized its decommissioning efforts and is endeavoring to keep the activities related to decommissioning on schedule. For example, SCE has continued its efforts to transfer fuel to dry storage and allowed certain limited decommissioning work streams to continue, consistent with California Governor Gavin Newsom’s March 19, 2020 Executive Order N-33-20 and the Pandemic Protocol referenced previously.

However, it remains possible that governmental orders and restrictions could impact SCE’s ability to conduct certain work on the currently-projected timeline. Should that occur, SCE will work diligently to ensure those activities related to its decommissioning activities are taken as soon as practicable and consistent with any COVID-19 related orders.

The following limited activities have commenced and/or are scheduled to commence in 2020:

Table 1: 2020 Schedule Milestones

Milestone	Start Date	Finish Date
Complete Remaining Pre-Construction Permit and Survey Requirements		1Q 2020
Start of Work	24 February 2020	
Mobilize and Stage Equipment	1Q 2020	2Q 2020
Rail Spur Modifications	1Q 2020	2Q 2020
Asbestos Abatement in Containment	1Q 2020	3Q 2020
Shipment of U1 RPV Offsite	2Q 2020	3Q 2020
Containment Structural Tendon Removal and Enlargement of Access Opening	3Q 2020	1Q 2021
Completion of U2&3 Fuel Transfer Operations	1Q 2018	3Q 2020
Implement ISFSI Only License Changes		3Q 2020

SCE anticipates providing an update on the status of these activities in its 2020 Annual Progress Report.

g. Assessment of Any Need to Amend This Permit – None

No physical decommissioning work was conducted in 2019 in support of the Project. 2019 Project activities only consisted of preparing for decommissioning work anticipated to begin in 2020. There is no need for a CDP amendment at this time.

3 Conclusion

In summary, 2019 Project activities were limited to preparing for decommissioning work anticipated to begin in 2020. No physical decommissioning work was conducted in 2019 in support of the Project, no changes to the Project as permitted are recommended at this time, and no CDP amendment is required.

In accordance with Special Condition 3, SCE will submit its 2020 Annual Progress Report on or about June 15, 2021.