About the Plans for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or Repository

The **Strategic Plan** identifies, analyzes, and makes recommendations on how to relocate the spent nuclear fuel at the San Onofre Nuclear Generating Station in a timely, safe, and commercially reasonable manner so that SONGS can be fully decommissioned, and the land restored for return to the Navy.

Currently, and until the spent fuel is relocated off site, it is securely stored in **sealed stainless-steel canisters that are housed in reinforced concrete structures. SONGS has 123 such canisters.**

U.S. policy on spent fuel disposition has been at an impasse for a decade. There is no program dedicated to a solution. Nuclear plants, especially those with no operating reactor, such as SONGS, cannot be fully decommissioned as long as there is no place to send the spent fuel. This amount of "stranded fuel" will continue to grow as more nuclear plants are retired.

The Strategic Plan cast a wide net to identify all potentially plausible alternatives for offsite spent fuel storage or disposal. These alternatives were the subject of a detailed analysis that included technical, regulatory, economic, and commercial reasonableness factors.

Based on this analysis, transferring the SONGS fuel to an offsite consolidated interim storage facility (CISF) was identified as the most likely pathway to clear the San Onofre site on a timeframe consistent with the SONGS Decommissioning Plan and schedule (completion by 2051).

There are currently two private initiatives to establish CISFs. While we are encouraged by these initiatives, the use of a private facility to store SONGS fuel would pose significant challenges and uncertainties as to commercial reasonableness for SONGS co-owners and customers. Some form of federal government support would help resolve cost and liability uncertainties. A federal CISF would enable the federal government to meet its responsibilities for spent fuel management while providing a commercially reasonable solution for SONGS.

Regardless of the pathway to offsite interim storage, some form of permanent geologic disposal is ultimately needed. Such a repository isolates the spent fuel from the environment for the very long time periods required. Interim storage would allow spent fuel to be removed from shutdown sites decades before a permanent site is available, and on a far more predictable schedule. The uncertainties surrounding each alternative analyzed in the Strategic Plan underscore the need for a flexible portfolio approach that can be tailored to take advantage of opportunities as they arise.

A companion **Conceptual Transportation Plan** describes the steps involved in moving the spent fuel once a receiving facility is operational. No matter which alternative is pursued, preparations on site can ensure that the SONGS fuel is ready to ship as soon as the opportunity arises.

Action by the federal government is the essential first step for moving forward on spent fuel storage and disposal plans. The federal government sets national policy and must take legal and financial responsibility for the disposition of spent fuel. A commercially reasonable approach is necessary because the federal government has already collected (and with accrued interest) holds nearly $1 billion from SONGS customers who pre-paid for the cost of transportation and disposal. A key concern is protecting customers from incurring additional costs that, under current law, are to be borne by the federal government.

The federal government needs to establish a new organizational framework with autonomy and reliable funding, support consolidated interim storage, start a new repository program, and invest in spent fuel transportation readiness.

To that end, the SONGS co-owners are partnering with other stakeholders to establish a coalition for progress on these critical issues, *Action for Spent Fuel Solutions Now*. An **Action Plan** outlines the commitments and steps SCE will take to help catalyze action and ultimately implement a solution.