

PROJECT MEMORANDUM

San Onofre Nuclear Generating Station (Songs) Units 2 and 3 Decommissioning Project

TO: Cynthia Herzog & Robin Tuohy, CSLC
FROM: Vida Strong, Aspen Project Manager
DATE: August 20, 2024
SUBJECT: Monitoring Report #36: November 2023 – July 2024

Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison's (SCE) San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Decommissioning Project (Project). Due to minimal planned ground-disturbing activities, the majority of demolition crews were on hiatus between November 2023 and May 2024. During this time, activities were primarily limited to work activities within the containment areas. The Greater than Class C (GTCC) cleanup activities were completed in May which facilitated the recommencement of demolition activities.

CSLC Monitoring: Jamie Miner (Lead Environmental Monitor) was onsite on February 29 and May 28, 2024. Jacob Aragon (Environmental Monitor) was onsite on May 28, 2024.

This report addresses the Project through two major components:

- **Onshore Activities.** Major onshore activities will occur at the existing facility within an approximately 84-acre project site. Onshore work will include, but not be limited to, the following: the establishment of equipment and material staging yards; the reconfiguration and/or reinforcement of site access roads and entrances; the installation, modifications, or upgrades to rail infrastructure; the construction of temporary containment enclosures to perform decontamination and dismantlement tasks; the completion of radiological remediation pursuant to applicable U.S. Nuclear Regulatory Commission regulations; the segmentation and packaging of reactor vessel internals for shipment and disposal; the removal and disposal of large components (e.g., reactor vessels, steam generators, pressurizers, turbine-generators); the dismantlement of container buildings; the removal of all remaining above-ground structures; and the partial removal of subsurface structures, systems, and components.
- **Offshore Activities.** Major offshore activities will occur within an approximately 21 acres of tide and submerged lands immediately southwest of the site. Offshore work will include the removal of two primary offshore intake structures (POIS), two auxiliary offshore intake structures (AOIS), 12 diffuser structures, 23 manhole access port structures (MAPS), one fish return conduit, and five buoys (3 environmental monitoring buoys and 2 navigational buoys) and their attached instruments and anchors.

Summary of Onshore Construction Activities

The following section presents a brief overview of general onshore activities, describes how they were conducted during the reporting period, and provides a description of how they will be implemented in the near future.

Material and Equipment Mobilization

Overview. Material and equipment will be mobilized to and from the site or from one area of the site to another. Brandenburg Construction is the primary demolition contractor. Mobilizing of materials and equipment to their material and staging yard in Parking Lot 4 was initiated in November 2020.

Current Activities. Material and equipment were mobilized to and from the site and within the site throughout the reporting period.

Planned Activities. Material and equipment mobilization will continue throughout the duration of the Project.

Soil Vapor Probes Installation and Monitoring

Overview. In order to meet the requirements of a Corrective Action Consent Agreement with the California Department of Toxic Substances Control (DTSC), soil sampling is required to characterize the site for future remediation and cleanup. This testing was initiated in September 2021 and was conducted during the reporting period.

Current Activities. The final four soil vapor probes were installed during the reporting period. To date, a total of 52 of 52 probes have been installed. Testing was performed during the reporting period (see Photo 1).

Planned Activities. Soil probe monitoring will continue throughout the duration of onshore demolition activities.

Groundwater Testing Well Installation and Monitoring

Overview. As part of the Corrective Action Consent Agreement with the DTSC, groundwater testing is being performed to characterize the site for future remediation and cleanup. Testing requires the installation and monitoring at various well locations across the Project site. These include 14 newly installed and 9 existing well locations. Well installation and testing were initiated in October 2021 and installation was completed in March 2022.

Current Activities. Groundwater testing and sampling were performed during the reporting period.

Planned Activities. Groundwater monitoring at selected wells will continue on an annual basis.

Utility Isolations

Overview. Utility isolations include confirming existing utility (e.g., water, electricity, sewer) locations and performing shallow excavations to conduct air gapping or capping prior to demolition of above-grade structures. The remaining subsurface utility infrastructure, along with building slabs and foundations, will be subsequently removed upon completion of the necessary utility isolations. These activities are being performed by various contractors.

Current Activities. Activities conducted during the reporting period included fire hydrant isolations directly south of the railyard (see Photo 2). Several isolations associated with water, electricity, and/or sewage to the Sewage Treatment Facility and Oil-Water Separator were conducted during the reporting period.

Planned Activities. Utility isolations will be ongoing throughout onshore decommissioning and demolition activities.

Road and Rail Installation and Repairs

Overview. Installation of two new additional rail tracks has been completed to facilitate ingress/egress and import/export of materials and equipment. New rail installation was initiated in September 2021 and completed in February 2022. Various rail and road repairs will be conducted as needed throughout the duration of the Project.

Current Activities. A new rail switch was installed along the east road between the Unit 2 and Unit 3 Containment Buildings (see Photos 3 through 5).

Planned Activities. Minor road and rail repairs will continue across the site as necessary throughout the duration of the Project.

Asbestos Abatement

Overview. Asbestos abatement activities are planned to occur in two broad phases. Phase I includes the abatement of friable asbestos and the removal of related materials and equipment. Phase II includes the abatement of non-friable asbestos and the cleaning of affected areas within Unit 2 and Unit 3 and above-ground buildings prior to demolition. The San Diego Air Pollution District is providing spot-check inspections. Abatement activities associated with Phase I were completed in mid-November 2020. Abatement activities associated with Phase II are being conducted by Brandenburg Construction.

Current Activities. Phase II abatement continued within the Unit 2 and Unit 3 Containment Buildings and was completed in the Control Building during the reporting period.

Planned Activities. Phase II abatement will continue throughout building demolition.

Demolition Activities

Overview. Demolition activities consist of above-ground infrastructure and at- or below-grade slabs and foundations.

Current Activities. Demolition activities were greatly reduced in magnitude during the reporting period. Activities that did occur were limited to the MPH Building and the Control Building (see Photos 6 and 7).

Planned Activities. Demolition of the Control Building is scheduled to be completed by the end of August 2024. Demolition of the Radiological Waste Building is scheduled to commence in September 2024.

Site Preparation

Overview. These activities will include grading to stabilize work areas, recontouring to natural conditions, maintaining positive drainage, and various other site preparation activities throughout the duration of the Project.

Current Activities. Upon completion of demolition of the MPH Building, grading activities were conducted to stabilize existing slopes.

Planned Activities. Grading and site stabilization activities will occur as needed throughout demolition.

Concrete Crushing and Sorting

Overview. Concrete materials remaining from demolition activities are being recycled for use when possible. Materials are being crushed and sorted onsite. Concrete crushing and sorting activities were initiated in July 2021.

Current Activities. Concrete crushing and sorting activities resumed in the spring of 2024.

Planned Activities. The concrete crusher and associated equipment are currently at the site to process additional demolition concrete.

Debris Removal

Overview. Debris removal associated with all construction activities consist of mixed materials and are being conducted by rail car and haul trucks. In 2023, 144-million pounds of waste were shipped offsite for dispositioned. The waste removed from site to date has exceeded 303-million pounds and a total of 4,563 shipments of all types have been shipped offsite since the onset of the Project.

Current Activities. Construction debris offsite removal occurred via truck and rail throughout the reporting period. Greater than Class C (GTCC) waste transfer to the Independent Spent Fuel Storage Installation (ISFSI) was completed in the spring of 2024.

Planned Activities. Additional construction debris removal activities are expected to occur throughout the duration of the Project.

Additional Activities Occurring during the Reporting Period

Aside from the general activities discussed above, the following additional onshore work occurred during the reporting period:

- Saw cutting and trenching activities were performed in the Unit 2 and 3 Turbine Building basements and a new line was installed to facilitate RADIOLOGICAL waste transport (see Photos 8 and 9).
- Trenching activities associated with installing electrical equipment for the new Material Handling Facility (MHF) were conducted during the reporting period (see Photo 10).
- Testing was conducted at the MUDA to ensure soil was clean and met compaction requirements for future use as fill material (see Photos 11 and 12).
- Drilling/hand augering for site characterization consistent with the RADIOLOGICAL License Termination Plan was performed throughout the site.
- The Sewage Treatment Plant and Oil-Water Separator were remediated and taken offline in the spring of 2024 (see Photo 13).

Additional Planned Activities

The following additional onshore activities are scheduled to occur in the near future:

- Backfill excavation of the Make-Up Demineralizer Area (MUDA) Building is scheduled to begin in 2024.
- Drilling/hand augering for site characterization consistent with the Radiological License Termination Plan will continue in 2024.
- Soil removal at the MPHF will be initiated upon pending site characterization test results.

Summary of Offshore Construction Activities

Offshore construction activities are anticipated to start in 2026; however, the schedule is currently being reviewed to determine if activities will be moved to a later time.

Summary of Construction and Compliance Activities for the Reporting Period

Table 1a and Table 1b provide an overview of Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) for the Project onshore and offshore activities, respectively, and related compliance information for the reporting period.

Table 1a: MMs/APMs and Compliance Information for Onshore Activities

MM/APM Description	Related Compliance Information
Air Quality	
MM AQ-3a: Off-Road Equipment Emissions	■ Tier 4 engines shall be used; however, exceptions include (1) heavy equipment with engines greater than 50 horsepower that does not meet Tier 4 requirements can be utilized on an interim basis until the end of 2020; (2) off-road equipment items that are a specialty, or unique, piece of equipment that cannot be found with a Tier 4 or better engine after a due diligence search that includes contacting at least three relevant equipment rental firms; and, (3) an off-road equipment item that shall be used for a total of no more than ten days. ■ On December 15, 2022, SCE submitted documentation for use of an airline tow tractor (tug) that does not meet Tier 4 requirements. Per number (2) above, the documentation provided communication between the contractor and three separate rental agencies indicating that the tug was the only piece of equipment available. As of May 2024 this equipment is no longer being used for project activities, but will remain onsite for future maintenance. ■ On June 27, 2024, SCE submitted documentation for use of dust control equipment that will be mounted to a Tier IVF manlift for the duration of the project. Per first bullet, number (2) above, the documentation provided communication between the contractor and four separate rental agencies indicating that the equipment is specialized and not readily available to rent. ■ According to SCE, there were no compliance issues associated with MM AQ-3a identified during the reporting period.
APM-3: Vehicle Emission Reductions	■ According to SCE, there were no compliance issues associated with APM-3 identified during the reporting period.
APM-4: Dust Suppression	■ According to SCE, there were no compliance issues associated with APM-4 identified during the reporting period.
APM-5: Vehicle Speeds	■ According to SCE, no unpaved roads are expected to be used for current project construction activities. ■ According to SCE, there were no compliance issues associated with APM-5 identified during the reporting period.
APM-6: Track-Out to Public Streets	■ According to SCE, there were no compliance issues associated with APM-6 identified during the reporting period.
APM-7: Tarping Trucks	■ According to SCE, there were no compliance issues associated with APM-7 identified during the reporting period.
Biological Resources	
MM BIO-1a: Worker Environmental Awareness Program	■ The WEAP training was finalized and approved in November 2019. ■ Sign-in sheets for crew WEAP training are being provided to CSLC as trainings are conducted.
MM BIO-1b: Weed Management	■ This measure does not go into effect until post-construction activities are implemented.
MM BIO-1c: Rare Plant Surveys	■ A CSLC-approved botanist conducted the most recent protocol-level rare plant surveys on September 4 and 5, 2023 and the 2023 Rare Plant Survey Results Report was submitted to CSLC on September 15, 2023. The results of 2023 surveys are valid for a period of three years. ■ One special-status rare plant species, Blochman's dudleya (<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>) (California Rare Plant Ranking [CRPR] 1B.1), was documented during

MM/APM Description	Related Compliance Information
	2023 surveys. However, this observation is located in an area of California State Parks land outside of project disturbance limits. ■ Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2a: Special-Status Reptiles and Amphibians	■ SCE has not scheduled 2024 surveys based on upcoming construction schedules. This will be subject to change if required. ■ No special-status reptiles or amphibians were observed throughout the reporting period. ■ Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2b: Surveys and Monitoring for Nesting Birds	■ Although not a specified requirement of MM BIO-2b, SCE is implementing a Nesting Bird Management Plan that details procedures to comply with federal and State regulations and permits and identifies measures pertaining to nesting birds encountered during the project. ■ On August 17, 2020, SCE submitted a variance request to include implementation of SCE's Special Use Permit conditions for nest removals during critical decommissioning work activities (see Table 3). The variance was approved by CSLC on August 19, 2020. ■ The 2024 Nesting Bird Survey Report is anticipated to be submitted to CSLC in September 2024. ■ There are currently four active nests onsite all of which are located within the IFSFI. There are currently no active nests within project work areas.
MM BIO-2c: Burrowing Owl	■ SCE provided language in the Burrowing Owl 2021 Survey Report that surveys would no longer be required due to a lack of suitable nesting habitat and lack of breeding records in the region. This report was submitted to CSLC and CDFW on July 19, 2021. ■ No individual owls, active burrows, or nests were identified during the reporting period. ■ Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2d: Western Snowy Plover/California Least Tern	■ On July 17, 2020, SCE submitted a variance request for the temporary suspension of surveys for western snowy plover and California least tern (see Table 3). The variance was approved by CSLC on July 17, 2020. ■ Surveys are scheduled to resume during the season prior to offshore activities (estimated for 2025). ■ Periodic biological sweeps and monitoring will resume during the 2023 season.
MM BIO-2e: Coastal California Gnatcatcher	■ MM BIO-2e states that prescribed buffers for coastal California gnatcatcher active nests may be adjusted by the SCE biologists in consultation with USFWS and CDFW. The Aspen LEM received, via email on April 28, 2020, the documented coordination between SCE and these agencies that identifies specific measures that will be implemented in order to avoid implementing nesting buffers for this species. ■ Protocol-level surveys for coastal California gnatcatcher were completed on March 29; April 12 and 26; May 17; and June 14 and 28, 2024, and the 2023 Survey Results Report was submitted to CSLC on July 16, 2024. ■ Although several coastal California gnatcatcher individuals, pairs, and family groups were detected during surveys, only one active nest was identified during the 2024 season. The nest was located approximately 10 feet from a public road and over 4,500 feet away from the SONGS demolition area. Therefore, no exclusion buffers were implemented or required.
MM BIO-2f: Noise Minimization Plan	■ The Noise Minimization Plan was finalized and approved in November 2019. ■ Noise monitoring, where applicable, will continue throughout onshore demolition activities.
MM BIO-3: Sensitive Bat Species	■ Surveys for sensitive bat species are required within 14 days prior to dismantling and external demolition activities of the onshore site facilities. ■ The initiation of new onshore demolition activities was not scheduled during the reporting period.
MM BIO-4: Potential Waters of the U.S./State	■ CSLC has requested information regarding the water agencies jurisdictional approach for a concrete lined ditch that occurs within the site. According to SCE, any work activities associated with the concrete lined ditch are not expected to occur. Consequently, SCE has yet to complete coordination with the water agencies regarding this

MM/APM Description	Related Compliance Information
	issue and is aware that this coordination is required if activities result in the removal of the concrete lined ditch.
APM-8: Nesting Bird Deterrents	■ The installation of additional deterrents was discussed between the LEM and SCE staff during the 2020 nesting season and SCE is aware that consultation with the LEM and CDFW (if requested) will be required prior to any future installation. The LEM has specifically requested consultation prior to the installation of any exclusionary netting located within or immediately adjacent to habitats dominated by native vegetation and/or near any active nests.
Cultural and Paleontological Resources	
MM CR/TCR-2a: Archaeological and Tribal Monitoring	■ According to SCE, archeological monitors were present for required ground disturbing activities, during the reporting period.
MM CR/TCR-2b: Unanticipated Cultural/Tribal Resources	■ On October 19, 2020, the CSLC received an email notification from SCE that a Treatment Plan for unanticipated tribal resources had been approved by the Rincon Band of Luiseno Indians. The Final Treatment Plan was submitted to the CSLC via email on December 11, 2020. The Rincon Band of Luiseno Indians concurred with the Final Plan and provided no additional comments via email on December 28, 2021. ■ SCE held an initial tribal outreach meeting on May 20, 2022. Due to a lack of upcoming ground-disturbing activities, all parties agreed to move meetings to a quarterly schedule. The most recent quarterly meeting occurred on August 18, 2023. Due to minimal planned ground-disturbance activities that occurred during the reporting period, the next quarterly meeting is scheduled for August 23, 2024.
MM CR-4a: Paleontological Monitoring	■ According to SCE, paleontological monitors were present for required ground disturbing activities during the reporting period.
MM CR-4b: Unanticipated Paleontological Resources	■ According to SCE, no unanticipated paleontological resources were identified during the reporting period.
APM-10: Cultural Resources Protection	■ According to SCE, archaeological monitors were present for required ground disturbing activities during the reporting period.
APM-11: Appropriate Treatment of Human Remains	■ According to SCE, no human remains were identified during the reporting period.
Hazardous and Radiological Materials	
MM HAZ-4: Facility Hazardous Waste Permit Extension	■ SCE informed the LEM that the current Facility Hazardous Waste Permit is active until May 23, 2026. ■ On August 20, 2020, SCE submitted an email notification to CSLC that it had entered into a Corrective Action Consent Agreement with the California Department of Toxic Substances Control (DTSC) on August 23, 2020, which is a major step towards closing out the current Facility Hazardous Permit.
MM HAZ-5: Worker Registration/Certification	■ Required registrations/certifications are being provided to CSLC and uploaded to SCE's FRED. The most recent submittal, from June 17, 2024, included additional workers not previously identified to perform asbestos, lead-paint, and other hazardous materials removal and new certifications for those that expired since the previous submittal.
MM HAZ-6: Soil and Groundwater Site Characterization and Soil Management Plan	■ The Soil and Groundwater Site Characterization and Soil Management Plan (for non-radiological contamination testing for subsurface soil and groundwater) was finalized and approved in January 2020. ■ Pursuant to requirements of the Soil Management Plan, SCE has continued coordination with the DTSC in accordance with the Corrective Action Consent Agreement. Plans approved by the DTSC, to date, include a Quality Assurance Project Plan, Background Work Plan, and the Resource Conservation and Recovery Act (RCRA) Facility Investigation Work Plan. ■ The most recent Quarterly Soil Management Report was submitted to CSLC on July 20, 2024. The next report is expected no later than mid-October 2024. ■ According to SCE, perimeter air monitoring and ground disturbance monitoring is ongoing and in accordance with the Soil Management Plan.

MM/APM Description	Related Compliance Information
APM-1: Waste Management Program	■ The Waste Management Program was finalized and approved in November 2019. ■ Implementation of Waste Management Program included characterization, handling, transport, and disposal of various waste streams generated at the site, including removal of asbestos, oils, fluorescent light ballasts, and universal waste such as mercury bulbs, thermostats, and batteries. Radiological waste from within the containment structures continues to be removed and disposed offsite by railcar.
APM-2: Hazardous Materials Business Plan (HMBP)	■ The HMBP was finalized and approved in November 2019. ■ SCE submitted the most recent revision of the HMBP to the San Diego County Department of Environmental Health and the revised HMBP was accepted by the California Environmental Reporting System (CERS) on May 29, 2024. Notification of the revised HMBP was submitted to CSLC via email on June 24, 2024. The most recent revisions to the HMBP include updates to the inventory and site maps to reflect current site conditions. The next update is scheduled to be submitted in February 2025.
APM-12: Stormwater Pollution Prevention Plan (SWPPP)	■ The project SWPPP was prepared in November 2019 and is currently available in the SWRCB's Stormwater Multiple Applications and Reports Tracking System (SMARTS). ■ There were no compliance issues associated with SWPPP implementation observed or reported during the reporting period.
APM-13: Spill Prevention Control and Countermeasure (SPCC) Plan	■ The SPCC Plan was finalized and approved in November 2019. ■ On June 24, 2024, SCE submitted a revised SPCC Plan to document changes in onsite inventories and site contact information due to progress made on decommissioning activities. ■ According to SCE, no reportable spills were identified during the reporting period.
APM-14: Spill Contingency Plan	■ According to SCE, no reportable spills were identified during the reporting period.
APM-23: ISFSI Radiation Monitoring	■ According to SCE, an ISFSI Radiation Monitoring System is installed and has been in effect since February 1, 2020. ■ The most recent Monitoring Report for June 2024 was submitted on July 29, 2024. ■ There were no low-level waste shipments offsite that impacted the radiation measurements by the ISFSI Radiation Monitoring System throughout the reporting period.
Hydrology and Water Quality	
MM WQ-4: Onshore Site Stabilization Plan	■ The Onshore Site Stabilization Plan was finalized and approved in December 2019. ■ Implementation of this plan is not required until the conclusion of onshore project activities and remains in effect until the beginning of future activities.
MM WQ-5: Walkway Flood Protection Plan	■ The Walkway Flood Protection Plan was finalized and approved in December 2019. ■ The public walkway is located along the base of the seawall between the Project's onshore and offshore components. ■ On May 18, 2021, SCE submitted an Addendum Memorandum to the Plan that documented design changes associated with the concrete berms. According to the Addendum, the north and south openings at the top of the seawall were blocked as of May 3, 2021, and discharges onto the public walkway are now permanently prevented.
Land Use and Planning	
MM LU-2a: Deconstruction Liaison	■ The LEM confirmed that SCE has appointed a Deconstruction Liaison. ■ Details associated with the Deconstruction Liaison are publicly available at the following website: www.songscommunity.com ■ As required, SCE submitted a summary documentation of all complaints, comments, and concerns from the second quarter of 2024 that were communicated to the Deconstruction Liaison via email on July 31, 2024. The next summary is expected to be submitted in October 2024.
MM LU-2b: Advance Notice of Deconstruction	■ According to SCE, advance notifications were distributed in January 2020.
MM LU-2c: Quarterly Deconstruction Updates	■ SCE submitted the Quarterly Deconstruction Update that covered activities from the second of 2024 on July 29, 2024. According to SCE, these updates were mailed to all residents within a five-mile radius of the project and were posted on the project public website. The next Quarterly Deconstruction Update is expected mid-October 2024.

MM/APM Description	Related Compliance Information
Recreation and Public Access	
MM REC-1a: Public Notification	- According to SCE, the initial public notification was provided in January 2020. - A public website is available at www.songscommunity.com
MM REC-1b: Public Access Plan	The Public Access Plan was finalized and approved in November 2019.
Transportation and Traffic	
APM-19: Emergency Services Access	According to SCE, there were no road/lane closures implemented during the reporting period.
APM-20: Oversize/Overweight Loads	According to SCE, an existing system is in place, with concurrence from the California Department of Parks and Recreation, to calculate oversize/overweight loads that are transported to and/or from the site via Basilone Road and across associated bridges (San Onofre Creek and Railroad Overhead) and to ensure that these loads do not exceed established limitations or safe operating conditions.
APM-21: Pedestrian and Bicycle Access and Safety	No activities were conducted during the reporting period that are applicable.

Table 1b: MMs/APMs and Compliance Information for Offshore Activities

MM/APM Description	Related Compliance Information
Air Quality	
MM AQ-3b: Marine Vessel Emissions	No offshore activities are currently scheduled to occur.
Biological Resources	
MM BIO-9: Hydrogen Sulfide (H2S) Gas Control Plan	No offshore activities are currently scheduled to occur.
MM BIO-10: Anchoring Plan	No offshore activities are currently scheduled to occur.
MM BIO-11: Marine Mammal and Sea Turtle Mitigation and Monitoring Plan	No offshore activities are currently scheduled to occur.
MM BIO-12: Invasive Non-Native Aquatic Species (NAS)	No offshore activities are currently scheduled to occur.
APM-9: Conduit Work Plan	No offshore activities are currently scheduled to occur.
APM-15: Dredging Plan	No offshore activities are currently scheduled to occur.
APM-16: Turbidity Monitoring	No offshore activities are currently scheduled to occur.
APM-17 Offshore Spill Response Plan	No offshore activities are currently scheduled to occur.
Cultural and Paleontological Resources	
MM CR/TCR-2c: Cultural Resource Identification during Offshore Geophysical Surveys	No offshore activities are currently scheduled to occur.
APM-10: Cultural Resources Protection	No offshore activities are currently scheduled to occur.
APM-11: Appropriate Treatment of Human Remains	No offshore activities are currently scheduled to occur.
Hazardous and Radiological Materials	
MM HAZ-4: Facility Hazardous Waste Permit Extension	No offshore activities are currently scheduled to occur.
MM HAZ-5: Worker Registration/Certification	No offshore activities are currently scheduled to occur.
APM-1: Waste Management Program	No offshore activities are currently scheduled to occur.
Recreation and Public Access	
APM-18: Notification to Local Mariners	No offshore activities are currently scheduled to occur.
Transportation and Traffic	
APM-22: Private Aids to Navigation	No offshore activities are currently scheduled to occur.

Compliance Summary

There were no compliance issues that were self-reported by SCE or identified by the CSLC LEM during the reporting period. Table 2 summarizes all non-compliance incidents to date.

Table 2: MMs/APMs Non-Compliance Information

Date Issued	Regulatory Requirement	Description
September 29, 2020	MM BIO-1a	A SCE inspector observed a SDS worker performing activities without a WEAP Training decal on his helmet. The inspector questioned the SDS foreman if the worker had attended WEAP Training prior to working onsite and it was determined that he had not. Worker was immediately pulled from duty and provided required WEAP Training the same day. This incident was self-reported by SCE and submitted to CSLC on October 1, 2020.
July 8, 2021	MM BIO-1a	SCE self-reported two crane operators onsite without required WEAP training. Both operators were immediately trained the following days. Additional corrective actions included updating onboarding procedures for training requirements and verification.
June 28, 2022	MM CR/TCR-2a and MM CR-4a	An approximately 12" deep by 18" wide by 10' long trench was excavated to install a Unit 2 Forebay dewatering pipe without the required archeological and paleontological monitors present. No affected cultural or paleontological resources were identified during subsequent inspections. This incident was self-reported by SCE and notification was submitted to the CSLC via email on June 29.
July 12, 2022	MM BIO-2a	SCE self-reported that work associated with running electrical cable through above-ground conduit occurred prior to a biological monitor arriving onsite. Although MM BIO-2a only requires monitoring during ground-disturbing activities, SCE had been performing biological monitoring in the area prior to the incident since work was being conducted in and near ruderal vegetation. According to SCE these activities were completed within 15 minutes without the monitor present, but subsequent inspections of the area determined that no biological resources were affected. The incident was reported to the CSLC via email the following day.

Variance Requests

There were no variance requests submitted during the reporting period. Table 3 provides a summary of all variance requests and approvals to date.

Table 3 – Variance Requests and Approvals Summary

Variance #	Date Requested	Date Approved	Description
1	July 17, 2020	July 17, 2020	SCE requested a variance to MM BIO-2d to postpone any further surveys for western snowy plover and California least tern until the first breeding season prior to the start of offshore activities. SCE provided CSLC with documented concurrence (based on previous negative survey results and limited suitable habitat) by USFWS and CDFW for this request.
2	August 17, 2020	August 19, 2020	SCE requested a variance to MM BIO-2b only during emergency situations to allow use of the Special Purpose Utility Permit (SPUT) in handling of specific migratory birds, nests, and eggs. The SPUT is only utilized where the safety of migratory birds, nests, or eggs pose a threat of fire hazard, mechanical failure, or power outage.

PROJECT PHOTOGRAPHS



*Photo 1 – Testing at an installed soil vapor probe (January 10, 2024)
(photo courtesy of SCE).*



*Photo 2 – Isolation of fire hydrant line directly south of the railyard (March 13, 2024)
(photo courtesy of SCE).*



*Photo 3 – Installation of new switch rail between Unit 2 and Unit 3 Containment Buildings
(June 20, 2024) (photo courtesy of SCE).*

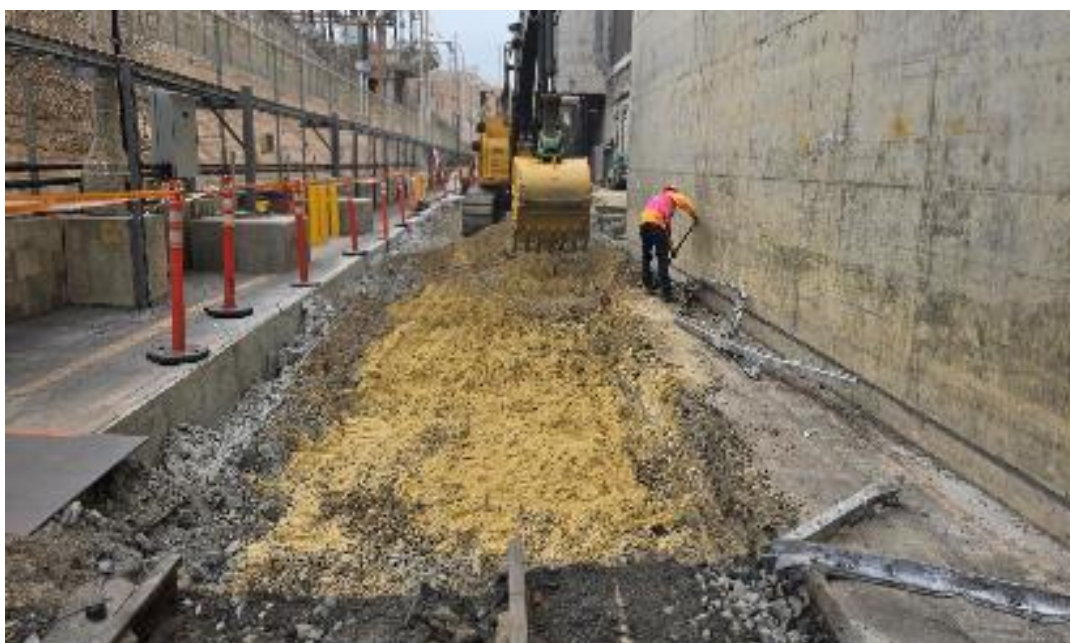


*Photo 4 – Installation of new switch rail between Unit 2 and Unit 3 Containment Buildings
(June 21, 2024) (photo courtesy of SCE).*



Photo 5 – Installation of new switch rail between Unit 2 and Unit 3 Containment Buildings (June 27, 2024) (photo courtesy of SCE).



Photo 6 – Completing demolition activities at the MPH Building (November 1, 2023) (photo courtesy of SCE).



*Photo 7 – Completing demolition activities at the MPH Building (November 3, 2023)
(photo courtesy of SCE).*



*Photo 8 – Trenching for new radiological waste line (November 21, 2023)
(photo courtesy of SCE).*

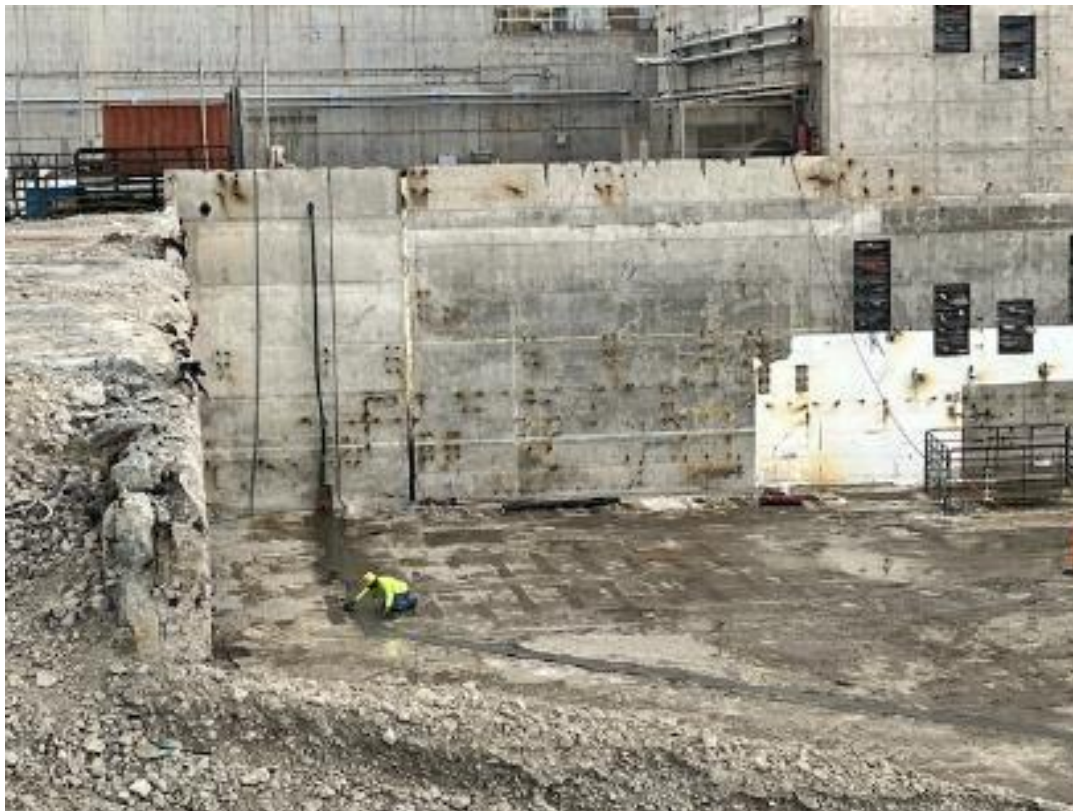


Photo 9 – Patching trench along new radiological waste line (February 29, 2024).



Photo 10 – Trenching for electrical conduit installation for the MHF Building (February 23, 2024).



Photo 11 – Soil testing at the MUDA (April 1, 2024) (photo courtesy of SCE).



Photo 12 – Soil testing at the MUDA (April 24, 2024) (photo courtesy of SCE).



Photo 13 – Oil-Water Separator that was remediated and taken offline during the reporting period (May 28, 2024).