

SONGS

2025 Decommissioning Progress Report

15 June 2026



SOUTHERN CALIFORNIA
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Submitted in compliance with Special Condition 3 of the 2019 SONGS Units 2 and 3 Onshore Decommissioning CDP (CDP 9-19-0194) and Special Condition 7 of the 2022 NUHOMS ISFSI CDP amendment (E-00-014-A2)

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List of Acronyms

AP	Action Plan
AAR	Association of American Railroads
CAB	Controlled Area Boundary
CACA	Corrective Action Consent Agreement
CAGN	Coastal California Gnatcatcher
CCC	California Coastal Commission
CDP	Coastal Development Permit
CEP	Community Engagement Panel
CGP	Construction General Permit
CIS	Consolidated Interim Storage
CSLC	California State Lands Commission
CTP	Conceptual Transportation Plan
D&D	Decontamination & Dismantlement
DOE	Department of Energy
DoN	U.S. Department of the Navy
DGR	Deep Geologic Repository
DTSC	California Department of Toxic Substances Control
EAB	Exclusion Area Boundary
FEIR	Final Environmental Impact Report
GTCC	Greater Than Class C waste
ISFSI	Independent Spent Fuel Storage Installation
IRMS	ISFSI Radiation Monitoring System
MMP	Mitigation Monitoring Program
NGAA	Nuclear Waste Administration Act of 2024
NRC	U.S. Nuclear Regulatory Commission
NPDES	National Pollutant Discharge Elimination System
RCRA	Resource Conservation and Recovery Act
RFI	Request for Information
SCE	Southern California Edison Company
SDG&E	San Diego Gas and Electric Company
SNF	Spent Nuclear Fuel
SONGS	San Onofre Nuclear Generating Station
SP	Strategic Plan
SWPPP	Stormwater Pollution Prevention Plan
WEAP	Worker Environmental Awareness Program

1 Introduction

Southern California Edison Company (SCE), on behalf of itself and its decommissioning co-participants San Diego Gas & Electric (SDG&E), the City of Riverside, and the City of Anaheim, provides this 2025 Annual Progress 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 (D&D) 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 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 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" listed above. Category "d" contains a detailed update on alternative waste storage facilities, in compliance with Special Condition 7 of the 2022 NUHOMS ISFSI CDP amendment, which extended the permit term through 2035.

This report describes progress made in 2025. The 2025 decommissioning activities generally consisted of building demolition; shipments of waste off-site; implementing work plans for compliance with the California Department of Toxic Substances Control (DTSC) Corrective Action Consent Agreement (CACA) to close-out the facility's Resource Conservation and Recovery Act (RCRA) permit; removal of systems and structures within the two containment domes; and continuing mitigation measure and permit conditions submittals, monitoring, and compliance.

This Report provides an update on the topics set forth above, including SCE's efforts to relocate spent nuclear fuel offsite, updates on Final Status Surveys, and anticipated schedule activity milestones for 2026. As described in more detail below, no changes to the Project are recommended, and no CDP amendment is required.

Additional information on decommissioning is provided by the SONGS Community Engagement Panel (CEP), which holds quarterly meetings focusing on public education and matters of interest to area communities related to the shutdown and decommissioning of SONGS. The CEP consists of volunteer rotating representatives from surrounding cities and counties, including elected officials, public servants, as well as representatives of the U.S. military, local environmental organizations, the business and labor communities, and local school districts.

The CEP met on 20 March, 12 June, 28 August and 13 November 2025. The CEP provided updates to the public on the DOE/Northwest National Lab Site-Specific De-Inventory Report, SONGS spent fuel dry cask storage inspections, emergency preparedness and offsite agency support, dismantlement progress, and provided a presentation from the U.S. Department of Energy on the High Burnup Research Cask transportation project.

Meeting materials and presentation recordings can be found at www.songscommunity.com/community-engagement/meetings.

2 2025 Annual Progress Report

SCE's 2025 progress regarding the items identified in Special Condition 3 is set forth below.

a. 2025 Demolition Activities and Environmental Permit Compliance

Demolition activities and off-site waste shipments continued in 2025. Actions to support environmental compliance and the Project's CACA with DTSC for non-radiological soil and groundwater investigation needed to close out the SONGS RCRA permit were ongoing.

i. Containment Dome Dismantlement

Within the containment domes, work continued to remove systems and structures in advance of the 2027 dome demolition. Completed activities in 2025 included removal of the large components within Units 2 and 3, segmentation of the Unit 3 reactor vessel, and setup of the decommissioning isolation enclosure tent for processing of materials removed from Unit 3. Hazardous materials removal continued in Unit 3, and materials to construct the Unit 2 decommissioning isolation enclosure tent arrived.

ii. Building and Structure Demolition

By the end of 2025, 48 of the 62 total buildings and structures at SONGS had been demolished through the decommissioning process. Key 2025 achievements included the demolition of support buildings connecting Units 2 and 3, and the demolition of the Unit 2 safety equipment and tank buildings.

iii. Waste Shipments

Since demolition began in 2021, SONGS decommissioning has removed over 630 million pounds of the anticipated one billion total pounds of waste for off-site recycling and disposal. In 2025, over 231.5 million pounds of rail and truck waste shipments were sent off-site, of which over 870,000 pounds were recycled. A total of 108 million pounds of waste have been recycled to-date.

The site continued to sort and package building debris for out-of-state disposal. Radioactive waste is transported by rail to Clive Utah, which will dispose of over 90-percent of the Project's radioactive waste, and the remaining is sent by truck to Andrews, Texas. Non-radioactive waste is transported by truck to La Paz, Arizona.

iv. Environmental and Permit Compliance, Monitoring, and Reporting

In 2025, SCE continued its timely compliance with the California State Lands Commission's (CSLC) Mitigation Monitoring Program (MMP) found in Exhibit C of general lease No. 6785.1 (SONGS decommissioning lease) and with the Special Conditions of the 2019 Onshore Decommissioning CDP.

SCE submitted two annual biological survey reports in 2025. The Project's Nesting Bird Management Plan provided protection through species-specific disturbance-free buffers. Protective measures and construction noise monitoring for coastal California gnatcatcher (CAGN) previously approved by both United States Fish and Wildlife Service and California Department of Fish and Wildlife were not needed in 2025. No active CAGN nests were found during surveys inside or outside of the SONGS site and the 500-foot survey buffer radius.

SCE notified the California State Lands Commission and Coastal Commission in February 2025 that it would be discontinuing the rare plant surveys it previously conducted under the SONGS Units 2 & 3 Decommissioning Project's Final Environmental Impact Report's Mitigation Monitoring Plan (MM BIO-1c) and 2019 SONGS onshore decommissioning CDP, Special Condition 13. Since decommissioning began in 2019, no species warranting any special avoidance, minimization, or compensation measures were noted. With most structures demolished onsite and the completion of ground-disturbing activities, the intent of the mitigation measure and the permit special condition have been satisfied.

The ISFSI Gamma Radiation Monitoring System (IRMS) continues to provide real-time radiation data streams to local and state agencies. The Radiologic Health Branch of the California Department of Public Health provides a monthly report of the data on their website.

Quarterly decommissioning updates were provided by US mail to residents within a five-mile radius of SONGS and emailed to applicable agencies and stakeholders. Additionally, quarterly summaries of any public complaints, comments, and concerns received by the SCE Deconstruction Liaison were provided to the CSLC. If contact information was provided, SCE responded within 72 hours. Most phone calls and emails were for employment opportunities and no complaints or concerns with D&D activities were received.

Aspen Environmental Group, retained by the CSLC to provide environmental compliance monitoring and reporting, conducted regular site visits. No non-compliances with the MMP were observed or noted. Worker Environmental Awareness Program (WEAP) training for biological resources was provided to 133

new decommissioning personnel by a qualified biologist. Training sign-in sheets are provided to CSLC and Aspen and are available on-site for review.

The SONGS individual National Pollutant Discharge Elimination System (NPDES) permit (Order No. R9-2015-0073, Permit No. CA0109282) continues to cover the site's incidental waste streams that result from the operation of the facility.

Stormwater management in areas disturbed by construction, demolition, or decommissioning activities are covered under the California State Water Resources Control Board's Construction General Permit (CGP) through the Project's Storm Water Pollution Prevention Plan (SWPPP) established in 2019. SWPPP monitoring and inspections continued in 2025 with no non-compliances reported.

In 2019, the site entered into a CACA with DTSC to close out the SONGS RCRA permit. Key deliverables to the DTSC for the CACA were developed and submitted with comments received, resolved, and incorporated for final approval. Sampling, air monitoring and reporting was provided throughout 2025.

Coordination calls with all affiliated and interested Tribes under Assembly Bill 52 outreach continued throughout 2025. Tribal monitoring is provided by the Rincon Band of Luiseño Indians and conducted with cultural resource and paleontological resource monitoring for decommissioning onshore ground disturbance.

b. Results of Any Final Status Surveys

Decommissioning work has been and continues to be conducted pursuant to Nuclear Regulatory Commission (NRC) regulations and oversight to meet the NRC's decontamination release requirements for unrestricted use of the land following D&D. For unrestricted use and the ultimate return of the property to the DoN, above-grade structures and all below-grade structures are anticipated to be removed to at least three feet (in most cases) below the existing SONGS Units 2 and 3 grade, consistent with the permitted Project description.

Upon completion of this phase of decommissioning, the site will enter into SAFSTOR conditions. SCE's contractor is completing a preliminary version of the Final Status Surveys for the site, which are not part of any NRC license termination plan at this time.

Above-grade structures to remain at the end of the Project include the shoreline riprap, seawall, and pedestrian walkway (covered by SCE's lease with the CSLC), the ISFSI, SONGS Unit 1 subsurface materials located under the ISFSI, utilities supporting the North Industrial Area and the SDG&E switchyard and related facilities, security features, access roads, parking areas and gunite-covered slopes.

Two above-ground buildings will remain at the time of license termination: the Synchronous Condenser Structure inside the switchyard and the Microwave Building.

A Final Status Survey will be performed on the remaining below-grade structures, systems and components and their associated soil areas. Additionally, a Final Status Survey for the ISFSI and associated security areas will be conducted once all spent fuel is permanently moved offsite. The survey data will be verified by the NRC or an NRC-appointed independent third party.

After Final Status Surveys are verified and the remaining below-grade structures and/or open areas are deemed to meet SCE requirements, the site will be graded and stabilized per the Onshore Grading Plan (approved by the CCC for Special Condition 4 on 4 December 2019) and per the requirements of the project's SWPPP (approved by the CCC for Special Condition 2 on 6 December 2019).

A total of nine preliminary Final Status Surveys were completed in 2025 with preparations completed for future additional Contract Compliance Final Status Surveys.

The Final Status Surveys conducted through 2025 met the acceptance criteria and found that residual radioactivity in the applicable survey units, compared with background radiation, did not exceed 15 mrem/year for the Average Member of the Critical Group (AMCG).

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

Final Status Surveys conducted to date did not identify any changes to the Project. The remaining Final Status Surveys will be completed prior to the end of decommissioning work, anticipated to be 2028.

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

SCE provides an update on its efforts to advance opportunities for long-term offsite storage and disposal of the spent nuclear fuel (SNF) currently stored at SONGS, in compliance with CDP 9-19-0194 Special Condition 3(d), using the detailed reporting format from CDP E-00-014-A2 Special Condition 7. SCE's ongoing efforts include the following:

i. Efforts to Identify and Evaluate Alternative Offsite Facilities

SCE has made efforts to identify and evaluate opportunities for establishing offsite facilities where SONGS spent fuel may be accepted. These include commercial/private consolidated interim storage (CIS) facilities, federal CIS facilities, and permanent disposal in deep geologic repositories (DGR).

In March 2021, SCE released its *Strategic Plan for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or a Repository* (SP) to assess alternatives for relocating SONGS SNF to offsite storage or disposal facilities. The SP evaluates various alternatives for the safe, commercially reasonable offsite relocation of SONGS SNF so that SCE may restore the SONGS site and return full control of the property to its owner, the DoN. SCE continues to advocate for these facilities.

An additional potential alternative for permanent disposal recently emerged, which is deep borehole technology. A decade ago, national laboratories and the US Department of Energy (DOE) established that deep borehole disposal technology is safe but were not able to bring it to technical maturity or demonstrate it in practice. Private-sector investment and partnership between the drilling expertise of the oil and gas sector and the engineering capabilities of the nuclear supply chain have taken the technology from a theoretical concept to a stage at which deep borehole technology is ready to start an NRC site licensing process. The State of Texas now is home to a multi-national Deep Borehole Demonstration Center. Deep borehole technology may be an alternative or companion to disposing SNF in a DGR.

ii. Activities to Advance Offsite Facility Locations

SCE continues its efforts to advance offsite storage facilities that could accept canisters from the SONGS ISFSIs. SCE's efforts focus on three strategies: (1) supporting the DOE's efforts to site federal CIS facilities using a collaboration-based process, (2) creating awareness for the challenge of offsite disposition of spent fuel, and (3) advocating legislative reform to support the federal spent fuel management program for both near-term CIS and long-term disposal facilities.

In 2025, SCE staff increased engagement with other coalitions and nuclear industry organizations. For example, SCE participated in the United States Nuclear Industry Council's (USNIC) Back-End Working Group and encouraged the Back-End Working Group to publish a policy paper on the federal spent fuel management program. SCE also collaborates with the Nuclear Waste Strategy Coalition, Energy Communities Alliance, Nuclear Energy Institute, Decommissioning Plant Coalition, and the National Association of Regulatory Utility Commissions.

The Spent Fuel Solutions (SFS) coalition hosted four webinars in 2025 to create awareness for the need to solve the spent fuel challenge – a February webinar on the successful siting of a DGR in Canada, a May event with the Energy Communities Alliance, a September program on the status of a French DGR, and an October webinar on deep borehole technology and its prospects for the spent fuel program.

In March 2021, SCE released its *Action Plan for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or a Repository* (AP). At that time, SCE announced the formation of the SFS coalition, with a mission to advocate for federal solutions to offsite SNF storage and disposal. Co-founders were SCE, the County of Orange, County of San Diego, San Diego Gas & Electric Company and the City of Riverside. The coalition enjoys a diverse membership, ranging from Laborers International Union of North America Local 89 and the San Luis Rey Band of Mission Indians to various business groups and environmental organizations. SFS began with membership from the communities around San Onofre and in 2025 grew to include members from 11 states.

SCE previously met with two commercial enterprises that were pursuing private CIS facilities – Interim Storage Partners in West Texas and Holtec in Eastern New Mexico. Both worked through the NRC licensing process and had local support, but both suffered from state-level opposition. After litigation vacating their NRC licenses proceeded all the way to the U.S. Supreme Court, both the Interim Storage Partners and Holtec projects are no longer going forward.

iii. DOE Activities re Federal Spent Fuel Management Program

The DOE also continued its activities for the federal spent fuel management program. In December 2021, the DOE restarted its SNF management program by issuing a Request for Information (RFI) for federal CIS facilities for commercial spent fuel. Input on the RFI was due March 4, 2022. SCE and the SFS coalition were among 225 entities that provided input to DOE. Appropriations and direction from Congress have facilitated the renewed efforts. Senior DOE officials say that significant work can be done to advance CIS under existing authorization.

In September 2022, DOE announced a funding opportunity for consortia across the country for planning and capacity building. The effort included \$26 million in awards to develop innovative community ideas,

incorporate principles of equity and environmental justice into strategies, and capture feedback on the interim storage of SNF and high-level radioactive waste.

In April 2023, the DOE provided an updated roadmap on the 10- to 15-year process to license, construct, and operate one or more federal CIS facilities. The roadmap consists of three stages. Stage 1 is for building relationships, mutual learning, and developing a common understanding of waste management-related topics. Stage 2 focuses on site screening and assessment during which DOE will issue initial criteria for suitable sites followed by a national call for volunteers, community-led development of additional criteria, and preliminary and detailed assessments. In Stage 3, DOE will enter into agreements with willing and informed host communities for the CIS licensing, construction, and operation activities to follow.

During a news conference at SONGS in June 2023, the then-U.S. Secretary of Energy Jennifer Granholm announced the \$26 million in awards to 12 entities, referred to as a collaboration-based siting consortia. The consortia are fostering community discussion and collecting feedback on consolidated interim storage of spent nuclear fuel with a performance period of 18 to 24 months.

In June 2023, a DOE official served as a keynote speaker at a joint meeting of the SFS coalition and the SONGS Community Engagement Panel to provide additional information about the DOE's collaboration-based siting initiative and the work of the consortia.

DOE held public webinars with the consortia in July 2023 and November 2023 to share information about the consortia's progress on community engagement activities and to provide direct sub-grants to communities wanting to learn more. The webinars provided a venue for members of the public to ask DOE officials questions and better understand the collaboration-based siting process.

In October 2023, DOE announced a new Deputy Assistant Secretary for Spent Fuel and High-Level Waste Disposition who in June 2024 served as the DOE guest speaker at a meeting co-sponsored by the SFS coalition and the SONGS CEP. In July 2024, SCE and SFS participated in a DOE shake table demonstration at UC San Diego. The demonstration project used a spent fuel canister with dummy fuel assemblies to illustrate durability under simulated earthquake conditions.

At present, DOE is only authorized by Congress to pursue Yucca Mountain as a DRG, although Yucca Mountain is limited in law to storing approximately half the volume of US spent nuclear fuel. Congressional action is required to amend federal law to provide for a more durable and integrated federal spent fuel program that includes both federal CIS and permanent disposal. The State of Nevada remains strongly opposed to the Yucca Mountain project. With Yucca Mountain at a standstill since 2010, one of the policy principles that SCE advocates is authorizing DOE to begin a collaboration-based siting process for a second permanent repository for spent nuclear fuel.

In May 2025, President Trump signed Executive Order 14302 (EO14302) which was titled, "Reinvigorating the Nuclear Industrial Base." EO14302 calls for strengthening the domestic nuclear fuel cycle including but not limited to a "permanent disposal pathway" for nuclear waste. The order required a report from the Secretary of Energy, in coordination with the Secretary of Defense, the Secretary of Transportation, and the Director of the Office of Management and Budget, to the President in January 2026.

iv. Congressional Activities to Address Necessary Legislation Changes

Most stakeholders, including SCE, believe that Congress must authorize the DOE to begin a collaboration-based siting process for a second permanent DGR, whether it be a mined repository like Yucca Mountain or a deep borehole facility. To this end, SCE has worked through the SFS coalition and an informal working group of stakeholders from across the country to advance policies that would enable progress on repositories and other elements of an integrated federal spent fuel management program.

In the spring of 2023, the informal working group held a series of meetings to align on policy priorities for amending federal law governing the US spent fuel program. The SFS coalition began cultivating potential champions in Congress who could lead an initiative to amend the Nuclear Waste Policy Act.

In May 2024, the SFS co-chairs, San Diego County Supervisor Jim Desmond and Orange County Supervisor Katrina Foley, led an advocacy trip to Washington, DC to meet with Congressional leaders and committee staff to advocate for legislative reform with participation by an Edison representative.

In September 2024, U.S. Representatives Mike Levin (Democrat-CA-49) and August Pfluger (Republican-TX-11) introduced the NWAA of 2024. A press release issued by Representative Levin included reference to the SFS coalition and quotes by the SFS co-chairs. No such legislation was introduced in 2025.

SCE and the SFS coalition have adopted four policy principles: (1) authorization to form a single-purpose, autonomous organization to manage the spent fuel program; (2) reliable and adequate funding; (3) authorization for a flexible, collaborative repository siting program that is not limited to any single site; and (4) revisions to the linkage between consolidated storage and a repository to allow for near-term offsite storage. Recommendations in the report stemming from E114302 may require additional amendments.

v. Status of Transportation Planning

In March 2021, SCE released its *Conceptual Transportation Plan for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or Repository* (CTP) supporting the eventual removal of SNF from SONGS. The CTP focuses on offsite transportation logistics and actions that SCE can take to prepare for shipment.

In 2021, SCE inspected canisters in the SONGS NUHOMS ISFSI under the NRC-approved Aging Management Program, using remote robotics and high-resolution borescopes. The canisters met the inspection criteria and continue to function as expected.

In 2024, SCE inspected canisters in the SONGS Holtec ISFSI under the Inspection and Maintenance Program (IMP) required by Special Condition 7 of the 2015 SONGS ISFSI CDP (CDP 9-15-0228). The canisters met the inspection criteria and continue to function as expected.

SONGS aging management inspections have found no aging-related degradation, and help assure the canisters are ready for transportation to offsite storage and disposal facilities.

In June 2024, DOE announced that the Association of American Railroads (AAR) has certified a high-tech railcar that was developed by DOE to transport the nation's commercial spent nuclear fuel (and high-

level radioactive waste from the defense program). Known as Atlas, the 12-axle railcar took 10 years to complete and cost approximately \$33 million dollars. A senior DOE official stated that the certification of the Atlas railcar was a “significant step forward” in developing the infrastructure to safely manage and store the country’s nuclear waste.

In March 2025, the SONGS Community Engagement Panel hosted a public meeting with experts from DOE and the Pacific Northwest National Laboratory to discuss a site-specific “de-inventory report” that was prepared for SONGS spent fuel. After analyzing conceptual transportation options and routes for SONGS spent fuel canisters once an offsite facility is available, the team determined the best approach to be an all-rail route using a single rail carrier with the railcars loaded at the on-site rail spur and then traveling approximately 2,200 miles to a site presumed for planning purposes to be located at the geographic center of the U.S.

vi. International Spent Fuel Management Developments

Finally, SCE provides an update on international developments related to spent fuel management and their relevance to the domestic spent fuel management program.

In March 2023, the SFS coalition hosted a public webinar on international best practices for siting spent fuel disposal facilities, with panelists from the Finnish, Swedish, and Canadian spent fuel programs. Finland is on track to open the world’s first deep geologic repository for spent fuel, Onkalo, in 2026.

In November 2024, the Canadian Nuclear Waste Management Organization announced that it had selected Wabigoon Lake Ojibway Nation and the Township of Ignace as the host communities for Canada’s DGR. The people of both communities have demonstrated their willingness to move forward with the DGR. In 2025, the project was working through the regulatory process.

Consent and collaboration are at the center of these international initiatives, which can and should inform the US spent fuel management program. There are no technical challenges preventing the US from siting and constructing spent fuel storage and disposal facilities. The challenges are sociopolitical. SCE is encouraged that the DOE is using a collaboration-based siting process to identify federal CIS facilities. SCE has advocated for Congressional leaders to authorize a collaboration-based approach to siting permanent storage facilities in the US, and the NWAA of 2024 included a provision that “allows affected communities to decide whether, and on what terms, the affected communities will host a nuclear waste facility.”

e. The Exclusion Area Boundary Remains Eliminated

As detailed in the 2024 annual update, in June 2024, SCE eliminated the Exclusionary Area Boundary (EAB) as required by Special Provision 32 of the 2019 CSLC SONGS Units 2 and 3 Offshore lease.

Special Provision 32 required SCE to decrease in the SONGS EAB “to the minimum required by law” once the spent fuel transfer to the ISFSI was complete. This provision also required SCE and CSLC to “jointly consult with the California Coastal Commission (CCC) to ensure that [reducing the EAB] will not interfere with [SCE’s] compliance with CCC permit conditions.”

The EAB is a requirement of operating nuclear power plants as one of several boundaries used to demonstrate compliance with off-site accident dose requirements. Now that SONGS has permanently ceased operations and the spent nuclear fuel is relocated to the ISFSI, there is no longer any potential for an accident with off-site dose potential and an EAB is no longer required.

Removing the EAB did not require NRC approval. In January 2023, the NRC granted SCE’s request to reduce the SONGS Control Area Boundary (CAB). This reduction is consistent with the “ISFSI Only” licensing requirements for off-site dose limits. The CAB, which limits personnel access to control and restrict radiation exposure, is now wholly within the SONGS NRC Licensed Boundary, with physical barriers to control access.

The CCC approved an immaterial amendment to Coastal Development Permit (CDP) 9-19-0194 on 23 July 2024 as part of the consultation required in CSLC Lease Special Provision 32. The amendment confirmed that removing the EAB boundary will not affect SCE’s compliance with CCC permit conditions, specifically SCE’s obligation to maintain the SONGS public walkway.

f. Changes to Project Schedule Activities that Occurred or are Anticipated In 2026

D&D activities in 2026 will continue to focus on demolition of buildings and structures; shipments of waste off-site; implementing work plans for compliance with the DTSC CACA to close-out the facility’s RCRA permit; removal of systems and components within the two containment domes; and continuing mitigation measure and permit conditions submittals, monitoring, and compliance.

See Table 1 below for major work activities anticipated in 2026.

Table 1: 2026 Major Work Schedule Activities (schedules are subject to change)

Work Location	Major Work Activity	Q1 2026	Q2 2026	Q3 2026	Q4 2026
North and East Plant Side (i.e., Parking Lots 3 & 4)	Material Delivery, Staging, and Removal	✓	✓	✓	✓
Containment Buildings	Reactor Segmentation and Removing Large Components	✓	✓		
Containment Buildings and Adjacent Structures	Demolition	✓	✓	✓	✓
Containment Buildings and Adjacent Buildings	Hazardous Materials Removal	✓	✓	✓	✓
Outer (former administration and maintenance) Buildings Area	Material Loading for Rail Delivery in Material Handling Tent			✓	✓
Site Wide	Site Characterization & Waste Shipments	✓	✓	✓	✓

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

Demolition work and off-site transportation of waste were the focus of 2025 activities. Site activities included biological surveys; preparation and removal activities inside the containment domes; building demolition, and continued sampling, monitoring and reporting to support the DTSC CACA. The 2025

schedule milestones, as conveyed in the 2024 Progress Report, were met. Therefore, there is no need for a CDP amendment at this time.

3 Conclusion

With D&D work the focus for 2025, all 2025 schedule milestones met, and with no change to forecasted Project activities or approach, there is no need for a CDP amendment at this time.

In accordance with Special Condition 3, SCE will submit its 2026 Annual Progress Report on or about 15 June 2026.

4 Site Photographs

UNIT 2 TANK FARM DEMOLITION: AUGUST (LEFT) AND OCTOBER (RIGHT) 2025



UNIT 3 DECOMMISSIONING ISOLATION ENCLOSURE CONSTRUCTION: OCTOBER 2025



REMOVAL OF REACTOR VESSEL LIFT SYSTEM FROM UNIT 3 CAVITY



PLACEMENT OF LOWER SECTIONS OF UNIT 3 REACTOR VESSEL INTO WASTE CONTAINERS

