



August 7, 2015

Dr. Joseph Street  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**RE: SCE Comments on the Staff Report for CDP Application #9-15-0162, Item Th15a**

Dear Dr. Street,

On behalf of its co-owners (San Diego Gas & Electric Company, the City of Anaheim and the City of Riverside), Southern California Edison Company (SCE) submits the enclosed comments on the Staff Report for the Spent Fuel Pool Island (SFPI) Project. We appreciate the opportunity to review and thank you for generating a thorough Staff Report recommending approval of the Project. SCE agrees with the overall analysis and findings contained in the Staff Report and offers these minor comments as clarifications.

The attached table includes comments that primarily pertain to technical information and clarification of specific statements. In addition, SCE wishes to clarify the role of the U.S. Nuclear Regulatory Commission (NRC) in its evaluation and inspection of the SFPI system. The Staff Report includes the following statement on page 8:

“NRC staff has communicated to Coastal Commission staff that the project is being reviewed under Section 50.59 screening criteria, and that the NRC would conduct an inspection of the facility after project completion.”

SCE now has more current information regarding the NRC’s review of the Project. SCE has recently determined that a license amendment will be submitted to the NRC before the existing spent fuel pool cooling equipment is fully retired. The license for an operating plant includes certain requirements that are more stringent than is needed for a permanently shutdown plant. When a plant is retired, the operating license is amended to reflect the reduced safety risks associated with a shutdown plant. All decommissioning plants undergo license amendment processes to address various site-specific changes to the plant. SONGS has already obtained

approval of license amendments, including the “Permanently Defueled Emergency Plan” and the “Permanently Defueled Technical Specifications.”

With respect to the spent fuel pools, at an operating nuclear plant freshly offloaded fuel is routinely added to the pools to cool. At SONGS, the fuel has been cooling for approximately 3.5

years and the heat load is significantly lower now than it was while the plant was operating (representing a more than 90 percent reduction in heat load). However, the current license still contains requirements for a cooling system that supports the higher heat loads for an operating plant. This includes a commitment to design spent fuel pool cooling equipment to withstand a design basis seismic event, which is unnecessarily conservative for a permanently shutdown plant.

At SONGS now, as a result of the reduced heat load, response time to any interruption in cooling has increased from a few hours during normal plant operation to more than five days. Therefore, applying the more restrictive operating plant seismic design criteria is no longer needed for the spent fuel pool’s ancillary cooling equipment (however, the spent fuel pool structure itself would continue to meet the NRC’s seismic design criteria). The proposed SFPI equipment will be installed in accordance with seismic design requirements specified by the California Building Code. Several other shutdown plants have used a similar approach in applying non-seismic design criteria for spent fuel pool cooling modifications.

To implement this approach, SCE is preparing a license amendment that will be reviewed in accordance with the NRC’s exclusive jurisdiction over the safety and other radiological aspects of the Project. The license amendment only addresses whether the SFPI can entirely replace the current cooling system. Therefore, the license amendment is not necessary for installation of the SFPI; however, the existing cooling system will remain available pending approval of the license amendment. It is anticipated that the license amendment process will take approximately six months and will be conducted in parallel with the installation and testing of the SFPI. Upon approval of the license amendment, SCE would permanently retire the existing cooling system.

To proceed with installation of the Project, SCE is seeking approval of the Coastal Development Permit. The CCC is reviewing potential environmental impacts of the Project and authorizing the construction activities associated with installation of the SFPI system. CCC Staff has concluded that the Project is consistent with the Coastal Act. Therefore, SCE requests that the CCC approve the application as recommended by Staff.



Thank you for considering our comments. If you have any questions, please feel free to contact me at (626) 302-8553 or via email at [kim.anthony@sce.com](mailto:kim.anthony@sce.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Kim Anthony", with a long horizontal line extending to the right.

Kim Anthony  
Environmental Project Manager  
SONGS Decommissioning Projects

Encl: SCE Comments on SFPI Staff Report

CC VIA EMAIL:

Tom Luster, CCC  
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