Southern California Edison
SCE-SDGE Joint DCE Application A.14-12-007

DATA REQUEST SET A.14-12-007 Gilmore-SCE-005

To: GILMORE
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Title: Project Manager
Dated: 06/05/2015

Question 79:

79. Does the DCE cost estimate in any way include the cost of repairing or replacing damaged canisters/casks? If it does, please identify the specific budget category or categories from Table 1 of the Decommissioning Cost Estimate that include(s) the cost.

Response to Question 79:

SCE objects to the request on the ground that it is vague and ambiguous. SCE also objects to the request on the ground that it is argumentative, and poses an incomplete hypothetical. Subject to and without waiving these objections, SCE responds as follows:

The DCE includes the costs to perform all decommissioning work that was known at the time it was developed. This includes the cost to safely store the fuel as long as it remains in the SONGS 2 & 3 pools; the cost to expand the ISFSI, to procure a sufficient number of canisters, and to transfer the fuel to the ISFSI; the cost to maintain the fuel in the ISFSI until it can be shipped offsite; and the cost to transfer the fuel canisters from the ISFSI to the DOE's transportation device for shipment to an offsite disposal or interim storage facility. The DCE does not include costs for hypothetical or speculative scenarios that are beyond the known scope of decommissioning work. SCE and the other SONGS decommissioning co-participants acknowledge their responsibility to ensure safe storage of the spent fuel until it is removed from SONGS, and will update the estimated spent fuel storage costs in the DCE as may be required by changed future circumstances.

The NRC has exclusive jurisdiction over the radiological aspects of the Proposed Project. Therefore, consideration of the structural integrity of the proposed technology is outside the scope of this proceeding. Nevertheless, SCE provides the following for informational purposes:

As discussed during a Community Engagement Panel (CEP) meeting, the technology to repair damaged stainless steel components is currently available and has been successfully utilized in the nuclear industry to repair various stainless steel reactor components, including for example, nozzles in reactor coolant systems. The tooling, however, for repairing canisters would need to be developed based upon these prior experiences. It is common within the industry to develop special tooling for particular applications as needed. Based on the robust design of the two dry storage systems for SONGS (Areva and Holtec), it is not anticipated that major repairs or

replacement of ISFSI components would be necessary.

In the unlikely event that a repair is needed, corrective actions would be undertaken in accordance with the ISFSI's AMP (to be developed as required for license renewal beyond the initial 20-year licensing term). These actions could include, but are not limited to, placing the canister in a transportation cask or using a secondary container around the canister. The exact tools, equipment, and facilities needed would depend on the nature of the damage being repaired or components that need to be replaced. As major repairs are not anticipated within the 60-year design life, nor expected within the 100-year service life of the system, this is an issue that should be periodically revisited as part of the AMP.