

PUBLIC SUBMISSION

As of: December 24, 2014
Received: December 22, 2014
Status: Pending_Post
Tracking No. 1jy-8g7e-s48p
Comments Due: December 22, 2014
Submission Type: Web

Docket: NRC-2014-0223

Southern California Edison Company; San Onofre Nuclear Generating Station, Units 2 and 3

Comment On: NRC-2014-0223-0001

Southern California Edison Company; San Onofre Nuclear Generating Station, Units 2 and 3; Post-Shutdown Decommissioning Activities Report

Document: NRC-2014-0223-DRAFT-0011

Comment on FR Doc # 2014-24356

10/14/2014

79 FR 61668

Submitter Information

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General Comment

The following comment is provided by CitizensOversight.

The questions provided are not clearly answered by the PSDAR and Detailed Cost Estimate.

Thank you

--Ray Lutz

CitizensOversight.org

See attached file(s)

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2014 DEC 24 AM 9:57

RULES AND DIRECTIVES
BRANCH
LEADS

Attachments

COPS_Questions_on_SONGS2&3_PSDAR&DCE

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= T. Wengert (TSW2)

J. Burkhardt (JCB2)

Citizens' Oversight Projects (COPs)

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August 26, 2014



REVIEW OF POST-SHUTDOWN ACTIVITIES REPORT (PSDAR) AND OTHER DOCUMENTS RELATED TO THE DECOMMISSIONING OF SAN ONOFRE

1. What system is being used to track the spending and work performed during the decommissioning process?
2. In the SONGS 1 decommissioning, SCE used a home-brew tracking system "CARS" which is now impossible to use, meaning we have lost that historical record. Essentially all information about SONGS 1 spending has been lost. Thus we have no means to reflect and compare the steps taken during SONGS 1 and the plans for SONGS 2 & 3. How is SCE safeguarding this information so it will not be lost this time, and so it can be used to inform other decommissioning projects, such as the inevitable decommissioning of the PG&E plant at Diablo Canyon?
3. Does SCE nevertheless have any other record of detailed spending for SONGS1
4. The major portions of the decommissioning process occur in three of the "decon" group of tasks, for a total of nearly half the total budget and encompassing over nine years, followed by two "Site Restoration" tasks, which comprise seven more years. Together, these five line items comprise about \$2.4 billion. These tasks should be broken down much further to allow the project to be tracked by oversight groups. → Please provide more detail on these line items on a year-by-year and subproject-by-subproject basis, including cost estimates for each subproject, and total proposed to be spent each year.

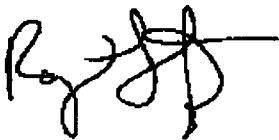
PERIOD	DESCRIPTION	PERIOD	YRS	COST (1000s)
Decon Pd 3	Decommissioning Preparations and Reactor Internals Segmentation – "decontamination and dismantlement of the major components in the containment building (RV internals, vessel, head, steam generators, pressurizer, and main piping)." <ul style="list-style-type: none">• DGC Mobilization and Planning• System Decontamination• Reactor Internals Removal Preparations• Reactor Internals Segmentation Planning and Implementation• Purchase Dry Storage Canisters for GTCC Waste• Segment and Package Reactor Internals for Storage in the ISFSI	6/30/2015 to 6/1/2019	3.92	\$539,009

Decon Pd 4	<p>Plant Systems and Large Component Removal – “decontamination and dismantlement of SSCs known to be substantially contaminated and the removal of the components from both Periods 3 and 4. ”</p> <ul style="list-style-type: none"> • Upgrade Rail Spur in Owner Controlled Area • Install Large Array Radiation Detection System to Monitor Shipments In/Out of Site • Remove, Package, and Dispose of Non-Essential Systems • Asbestos and Lead Abatement • Spent Fuel Pool Closure • Remove Spent Fuel Pool Racks, Spent Fuel Pool Island Equipment, and Bridge Crane • Remove and Dispose of Legacy Class B and C Wastes • Remove, Package, and Dispose of Essential Systems • Removal and Disposal of Spent Resins, Filter Media, and Tank Sludge • Large Component Removal • Prepare License Termination Plan 	6/1/2019 to 9/24/2022	3.31	\$804,504
Decon Pd 5	<p>Building Decontamination – “decontamination of the various buildings. As noted elsewhere it may be more appropriate to simply proceed with dismantlement if it is more timely and cost-effective to simply dispose of building material as radioactive waste.”</p> <ul style="list-style-type: none"> • Decontaminate Containment Buildings • Decontaminate Turbine Buildings • Decontaminate Fuel Handling Buildings • Decontaminate Auxiliary Rad-waste Building • Decontaminate Auxiliary Control Building • Decontaminate Penetration Buildings • Decontaminate Safety Equipment and Main Steam Isolation Valve (MSIV) Buildings • Radiological Survey of Structures During Decontamination 	9/24/2022 to 7/13/2024	1.80	\$429,106
Site Restoration Pd 4	<p>Building Demolition to Three Feet Below-Grade</p> <ul style="list-style-type: none"> • Demolition Preparations • De-tension and Remove Containment Building Tendons • Demolish Diesel Generator Buildings • Demolish Condensate Buildings and Transformer Pads • Demolish Full Flow Areas and Turbine Buildings • Demolish Auxiliary Rad-waste Building • Demolish Auxiliary Control Building • Remove Systems and Demolish Make-up Demineralizer Structures 	7/13/2024 to 10/14/2028	4.25	\$259,066

	<ul style="list-style-type: none"> • Demolish Penetration Buildings • Demolish Safety Equipment and MSIV Buildings • Demolish Fuel Handling Buildings • Demolish Containment Buildings • Demolish Intake and Discharge Structures 			
Site Restoration Pd 5	<p>Subgrade Structure Removal Below Three Feet</p> <ul style="list-style-type: none"> • Install Sheet Piling and Excavation Shoring, Dewatering System, and Effluent Treatment and Discharge Controls • Demolish and Backfill Subsurface Structures • Demolish and Backfill Intake Structure Inside Seawall • Remove Off-shore Intake and Outfall Conduits • Remove Sheet Piling and Excavation Shoring, and Perform Dewatering and Effluent Treatment • Finish Grading and Re-vegetate Site As Needed/Required 	10/14/2028 to 12/5/2031	3.14	\$441,547
(TOTAL)				\$2,473,232

5. When and how much money does SCE plan to request to be provided from the decommissioning project using the Advice Letter process.
6. In the Nuclear Decommissioning Cost Triennial Proceeding, SCE testified that you were not planning on comparing the detailed cost estimate with the actual spending levels. Do you still plan to try to avoid this level of reasonable oversight in the spending of ratepayer monies?
7. Does SCE already have a contract with Waste Control Specialists in Andrews, Texas, to accommodate all the waste other than the high-level waste stored in the dry-cask storage facility on site?
8. The SONGS 1 Reactor Pressure Vessel still exists on site and there have been serious technical problems associated with “segmentation” and transportation. What are the exact plans to deal with all the reactor pressure vessels?
9. Why is the transmission line switchyard not included in the decommissioning project?

Sincerely,



Raymond Lutz
National Coordinator, Citizens' Oversight Projects