



An EDISON INTERNATIONAL Company
San Onofre Nuclear Generating Station

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Vice President Decommissioning &
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August 13, 2015

10 CFR 50.12

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington D.C. 20555-0001

Subject: Docket Nos. 50-206, 50-361 and 50-362, Exemption Request from the Records Retention Requirements of 10 CFR Part 50, Appendix A Criterion 1; 10 CFR Part 50, Appendix B Criterion XVII; 10 CFR 50.59 (d)(3); and 10 CFR 50.71(c), San Onofre Nuclear Generating Station Units 1, 2, and 3.

Dear Sir or Madam:

In accordance with 10 CFR 50.12, Specific Exemptions, Southern California Edison (SCE) is hereby requesting the following exemption for San Onofre Nuclear Generating Station (SONGS) Units 1, 2, and 3 from the records retention requirements of:

- 10 CFR Part 50, Appendix A Criterion 1 which requires certain records be retained throughout the life of the unit;
- 10 CFR Part 50, Appendix B Criterion XVII which requires certain records be retained consistent with regulatory requirements for a duration established by the licensee;
- 10 CFR 50.59(d)(3) which requires certain records be maintained until termination of a license issued pursuant to Part 50; and
- 10 CFR 50.71(c) which requires certain records to be maintained consistent with various elements of the NRC regulations, facility technical specifications and other licensing bases documents.

SCE proposes to eliminate these records when the licensing basis requirements previously applicable to SONGS Units 1, 2, and 3 and associated systems, structures and components (SSC) are no longer effective. These records would be destroyed following the removal of obsolete requirements from the Defueled Safety Analysis Report (Unit 1), Updated Final Safety Analysis Report (Units 2 and 3) and/or Technical Specifications by appropriate change mechanisms.

SCE is not requesting exemption from any record keeping requirements associated with storage of SONGS Units 1, 2, and 3 spent fuel at its Independent Spent Fuel Storage Installation (ISFSI), Facility Operating Licenses No. DPR-13, NPF-10 and NPF-15 under 10 CFR Part 50 or the General License requirements of 10 CFR Part 72. No exemption is being requested from the decommissioning records retention requirements of 10 CFR 50.75, or any other requirements of 10 CFR Part 50.

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Attachment 1 provides the basis for the Exemption from Records Keeping Requirements request for SONGS Unit 1. Attachment 2 provides the basis for the Exemption from Records Keeping Requirements request for SONGS Units 2 and 3. Attachment 3 provides the No Significant Hazards Determination and the Environmental Impact Evaluation for SONGS Units 1, 2, and 3.

The information provided in Attachments 1, 2, and 3 gives the NRC sufficient basis for granting exemption from the record keeping requirements of 10 CFR Part 50, Appendix A, Criterion 1; 10 CFR Part 50, Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c) for records pertaining to SSCs or activities associated with the nuclear power unit and associated support systems that are no longer required to support licensed activities at the SONGS Units 1, 2, and 3 site. This exemption does not apply to any record keeping requirements for storage of the spent fuel at the SONGS ISFSI under 10 CFR Part 50 or the general requirements of 10 CFR Part 72.

There are no regulatory commitments contained in this submittal.

If there are any questions, please call Mr. Jim Kay, Manager, Nuclear Regulatory Affairs, at (949) 368-7418.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/13/15
(Date)

Sincerely,



Attachments: 1 - Basis for the Request for Exemption from Records Keeping Requirements for SONGS Unit1
2 - Basis for the Request for Exemption from Records Keeping Requirements for SONGS Units 2 and 3
3 - No Significant Hazards Determination and Environmental Impact Evaluation for SONGS Units 1, 2, and 3

CC: M. Dapas, Regional Administrator, NRC Region IV
M. Vaaler, NRC Project Manager, SONGS Unit 1
Thomas J. Wengert, NRC Project Manager, SONGS Units 2 and 3
R. L. Kellar, Region IV, Branch Chief, Repository and Spent Fuel Safety
W. C. Allen, NRC Project Manager, SONGS ISFSI

Attachment 1

Basis for the Request for Exemption from Records Keeping Requirements for SONGS Unit1

BACKGROUND

SONGS Unit 1 commercially generated power from January 1, 1968 until November 30, 1992. SONGS Unit 1 was permanently defueled on March 6, 1993 (References 1 and 2) and was maintained in SAFSTOR until June 1999, when decommissioning was initiated. Spent fuel has been removed from SONGS Unit 1.

Although permanently shut down, SONGS Unit 1 remains subject to applicable rules, regulations, and orders of the U.S. Nuclear Regulatory Commission (NRC).

SCE submitted the Proposed Decommissioning Plan for SONGS Unit 1 by letter dated November 3, 1994 (Reference 3). As a result of the 1996 revision to 10 CFR 50.82, the NRC noticed the proposed Decommissioning Plan as the Post Shutdown Decommissioning Activities Report (PSDAR) for SONGS Unit 1 (December 19, 1996 Federal Register).

As described in the PSDAR, SONGS Unit 1 is being returned to a condition suitable for unrestricted use. Currently, plant dismantlement is complete and nearly all of the SSCs have been shipped out for disposal. Only the spent fuel, reactor vessel and the below-grade portions of some buildings remain on-site. A portion of the site, a parcel of seabed overlaying buried portions of the SONGS Unit 1 circulating water system, has already been released for unrestricted use. The principal remaining decommissioning activity is soil remediation, compaction and grading. This is to be completed in conjunction with the decommissioning of the ISFSI subsequent to shipment off-site of SONGS stored spent fuel.

There are no SSCs classified as safety-related remaining at SONGS Unit 1. Decommissioning plans involved evaluating SSCs with respect to the current facility safety analysis; progressively removing them from the licensing basis where necessary through appropriate change mechanisms (for example, using the 10 CFR 50.59 process or by NRC approved Technical Specification changes, as applicable); revising the Defueled Safety Analysis Report (DSAR) when necessary; and then proceeding with orderly dismantlement. SONGS Unit 1 records are currently stored with those of Units 2 and 3, in facilities which will eventually be dismantled in the decommissioning of those units.

While SCE has retained the records required by the Facility Operating License as SONGS Unit 1 transitioned to fully dismantled status with the fuel in dry storage, plant dismantlement obviates the regulatory and business need for maintenance of most records. Since the SSCs were removed from the licensing basis and the need for their records is eliminated, SCE proposes that SONGS Unit 1 be exempted from the records retention requirements for SSCs and historical activities that are no longer relevant. Such an exemption would eliminate the associated, unnecessary regulatory and economic burden of retaining records relating to SONGS Unit 1 SSCs and no longer relevant historical activities, such as creating alternative storage locations and relocating records to those alternative locations.

BASIS FOR EXEMPTION

In order for an exemption to be granted from the requirements of 10 CFR Part 50, Appendix A, Criterion 1; Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c), SCE must show that the requirements of 10 CFR 50.12(a)(1) are met and that special circumstances, as specified in 10 CFR 50.12(a)(2), exist. As discussed below, this SCE exemption request meets these requirements.

I. General Justification for Granting the Exemption Request

A. Nuclear Power Generation SSCs

As described in the PSDAR, SONGS Unit 1 is undergoing decommissioning to return the site to a condition suitable for unrestricted use. Nearly all systems, structures and components and their foundations have been removed or abandoned. The general justification for eliminating records associated with that portion of the plant footprint is that these SSCs are currently removed from service under the NRC license, dismantled or demolished, and will not in the future serve any SONGS Unit 1 function regulated by the NRC.

SCE recognizes that the SONGS Unit 1 reactor vessel and site will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and decommissioning activities are and will continue to be appropriately addressed through the license and current decommissioning plan documents such as the DSAR and technical specifications. These programmatic elements and their associated records are not within the scope of this exemption request.¹

B. Spent Fuel and Associated SSCs and Activities

All spent fuel was transferred out of the SONGS Unit 1 spent fuel pool as of August 31, 2004. The SONGS Unit 1 spent fuel pool and associated SSCs have been dismantled and demolished in accordance with Decommissioning Plan requirements.

The exemption request is consistent with NRC clarification of Independent Spent Fuel Storage Installations (ISFSI) records disposition in Regulatory Guide 3.72 (March 2001). In this analogous case, the NRC clarified the retention period for records of changes in the facility of spent fuel storage cask design implemented under 10 CFR 72.48, Changes, Tests, and Experiments, by stating that records are to be retained until ... "spent fuel is no longer stored in the facility" (10 CFR 72.48(d)(3)(i)).

C. ISFSI and Spent Nuclear Fuel

SCE is not requesting any exemption associated with the retention of these records.

II. Specific Justification for Exemptions and Special Circumstances

As discussed below, this exemption request satisfies the provisions of 10CFR 50.12(a).

A. Specific Exemption is Authorized by Law

SCE's exemption request to reduce record retention durations is authorized by law and is within the NRC's authority. This request does not result in a violation of the Atomic Energy Act of 1954, as amended, or the NRC's regulations. In fact, NRC regulations, specifically 10 CFR 50.71(d)(2) allows for granting specific exemptions to the record retention requirements specified in 10 CFR Part 50. This paragraph states in part:

¹ Any changes made to these programmatic elements would be done through established change controls that fall outside the scope of, and do not affect, this request.

“...the retention period specified in the regulations in this part for such records shall apply unless the Commission pursuant 10 CFR 50.12 of this part, has granted a specific exemption from the record retention requirements specified in the regulations in this part.”

Similar exemptions were previously granted to other decommissioning nuclear plants, such as Rancho Seco, Haddam Neck, Maine Yankee and Zion.

B. Specific Exemption Will Not Present an Undue Risk to the Public Health and Safety

The public health and safety are unaffected by the proposed exemption. Removal of the underlying SSCs associated with the records has been or will be determined by SCE in accordance with 10 CFR 50.59 or NRC-approved license amendment, to have no adverse public health and safety impact prior to elimination of any records. Elimination of associated records for these SSCs can have no impact.

The exemption from the record retention requirements of 10 CFR Part 50, Appendix A; 10 CFR Part 50, Appendix B; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c) is administrative in nature and will have no impact on any remaining decommissioning activities or on radiological effluents. This exemption merely advances the schedule for disposition of specified records. Considering the content of these records, the disposition of these records on an advanced timetable will have no reasonable possibility of presenting any undue risk to the public health and safety.

C. Specific Exemption Consistent with the Common Defense and Security

The elimination of these records is administrative in nature and does not involve information or activities that could potentially impact the common defense and security of the United States. Upon dismantlement of the affected SSCs, the records have no functional purpose relative to maintaining the safe operation of the SSC or to maintaining conditions that would affect the common defense and security.

D. Special Circumstances are Present Pursuant to 10 CFR 50.12(a)(2)(ii)

This exemption request falls within the special circumstances set forth in 10 CFR 50.12(a)(2)(ii) which states in part *“special circumstances are present whenever: Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.”*

The common and underlying purpose of the record retention requirements of 10 CFR Part 50, Appendix A; 10 CFR Part 50, Appendix B; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c) is to ensure that the licensing and design basis of the facility is understood, documented, preserved and retrievable relative to establishing and maintaining the SSC safety functions for the life of the facility. As documented in the SONGS Unit 1 Defueled Safety Analysis Report, there are no SSCs classified as safety related remaining at SONGS Unit 1. As such, the SONGS Unit 1 SSCs no longer have safety functions which must be established or maintained. It follows that records required to establish or maintain safety functions of such SONGS Unit 1 SSCs no longer serve a safety or regulatory purpose. Therefore, application of the record retention requirements specified above in current SONGS Unit 1 circumstances does not serve the underlying purpose of the regulations.

- References:
1. Letter from W. C. Marsh, SCE, to U. S. Nuclear Regulatory Commission, dated March 8, 1993, Subject: Certification of Permanently Defueled Status, SONGS Unit 1
 2. Letter from W. C. Marsh, SCE, to U. S. Nuclear Regulatory Commission, dated March 10, 1993, Subject: Corrected Copy of Letter Certifying Permanently Defueled Status, SONGS Unit 1
 3. Letter from Richard Rosenblum, SCE, to U. S. Nuclear Regulatory Commission, dated November 3, 1994, Subject: Proposed Decommissioning Plan, San Onofre Nuclear Generating Station Unit 1

Attachment 2

Basis for the Request for Exemption from Records Keeping Requirements for SONGS Units 2 and 3

BACKGROUND

SONGS Units 2 and 3 commercially generated power until they permanently ceased operation and were defueled. (References 1, 2, and 3) Although, permanently shut down, SONGS Units 2 and 3 remain subject to applicable rules, regulations, and orders of the U.S. Nuclear Regulatory Commission (NRC).

SCE submitted the Post-Shutdown Decommissioning Activities Report (PSDAR) for SONGS Units 2 and 3 by letter dated September 23, 2014 (Reference 4). As described in the PSDAR, SONGS Units 2 and 3 will be returned to a condition suitable for unrestricted use. Decommissioning plans involve evaluating SSCs with respect to the current facility safety analysis; progressively removing them from the licensing basis where necessary through appropriate change mechanisms (for example, using the 10 CFR 50.59 process or by NRC approved Technical Specification changes, as applicable); revising the UFSAR when necessary; and then proceeding with orderly dismantlement.

While SCE is retaining the records required by the Facility Operating Licenses as SONGS Units 2 and 3 transition to fully dismantled status with the fuel in dry storage, plant dismantlement will obviate the regulatory and business need for maintenance of most records. As the SSCs are removed from the licensing basis and the need for their records is eliminated, SCE proposes that SONGS Units 2 and 3 be exempted from the records retention requirements for SSCs and historical activities that are no longer relevant. Such an exemption would eliminate the associated, unnecessary regulatory and economic burden of retaining records relating to SONGS Units 2 and 3 SSCs and no longer relevant historical activities, such as creating alternative storage locations and relocating records to those alternative locations.

BASIS FOR EXEMPTION

In order for an exemption to be granted from the requirements of 10 CFR Part 50, Appendix A, Criterion 1; Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c), SCE must show that the requirements of 10 CFR 50.12(a)(1) are met and that special circumstances, as specified in 10CFR 50.12(a)(2) exist. As discussed below, this exemption request meets these requirements.

II. General Justification for Granting the Exemption Request

A. Nuclear Power Generation SSCs

As described in the PSDAR, SONGS Units 2 and 3 are undergoing decommissioning planning to return the site to a condition suitable for unrestricted use. The general justification for eliminating records associated with SONGS Units 2 and 3 SSCs that are removed from service under the NRC license, dismantled or demolished, is that these SSCs will not in the future serve any SONGS Units 2 and 3 functions regulated by the NRC.

SCE recognizes that the SONGS Units 2 and 3 site will continue to be under NRC regulation until license termination primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and decommissioning activities are and will continue to be appropriately addressed through the license and current decommissioning plan documents such as

the UFSAR and technical specifications. These programmatic elements and their associated records are not within the scope of this exemption request.²

B. Spent Fuel and Associated SSCs and Activities

All spent fuel will eventually be transferred out of the SONGS Units 2 and 3 spent fuel pool. The SONGS Units 2 and 3 spent fuel pool and associated SSCs will be dismantled and demolished in accordance with PSDAR requirements.

This exemption request is consistent with NRC clarification of Independent Spent Fuel Storage Installations (ISFSI) records disposition in Regulatory Guide 3.72 (March 2001). In this analogous case, the NRC clarified the retention period for records of changes in the facility of spent fuel storage cask design implemented under 10 CFR 72.48, Changes, Tests, and Experiments, by stating that records are to be retained until ... "spent fuel is no longer stored in the facility" (10 CFR 72.48(d)(3)(i)).

C. ISFSI and Spent Nuclear Fuel

SCE is not requesting any exemption associated with the retention of these records.

II. Specific Justification for Exemptions and Special Circumstances

As discussed below, this exemption request satisfies the provisions of 10 CFR 50.12(a).

A. Specific Exemption is Authorized by Law

SCE's exemption request to reduce record retention durations is authorized by law and is within the NRC's authority. This request does not result in a violation of the Atomic Energy Act of 1954, as amended, or the NRC's regulations. In fact, NRC regulations, specifically 10 CFR 50.71(d)(2) allows for granting specific exemptions to the record retention requirements specified in 10 CFR Part 50. This paragraph states in part: *"...the retention period specified in the regulations in this part for such records shall apply unless the Commission pursuant 10 CFR 50.12 of this part, has granted a specific exemption from the record retention requirements specified in the regulations in this part."*

Similar exemptions were previously granted to other decommissioning nuclear plants, such as Rancho Seco, Haddam Neck, Maine Yankee and Zion.

B. Specific Exemption Will Not Present an Undue Risk to the Public Health and Safety

The public health and safety are unaffected by the proposed exemption. Removal of the underlying SSCs associated with the records has been or will be determined by SCE in accordance with 10 CFR 50.59 or NRC-approved license amendment, to have no adverse public health and safety impact prior to elimination of any records. Elimination of associated records for these SSCs can have no impact.

The exemption from the record retention requirements of 10 CFR Part 50, Appendix A; 10 CFR Part 50, Appendix B; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c) is

² Any changes made to these programmatic elements would be done through established change controls that fall outside the scope of, and do not affect, this request.

administrative in nature and will have no impact on any remaining decommissioning activities or on radiological effluents. This exemption merely advances the schedule for disposition of specified records. Considering the content of these records, the disposition of these records on an advanced timetable will have no reasonable possibility of presenting any undue risk to the public health and safety.

C. Specific Exemption Consistent with the Common Defense and Security

The elimination of these records is administrative in nature and does not involve information or activities that could potentially impact the common defense and security of the United States. Upon dismantlement of the affected SSCs, the records have no functional purpose relative to maintaining the safe operation of the SSC or to maintaining conditions that would affect the common defense and security.

D. Special Circumstances are Present Pursuant to 10 CFR 50.12(a)(2)(ii)

This exemption request falls within the special circumstances set forth in 10 CFR 50.12(a)(2)(ii) which states in part:

“special circumstances are present whenever: Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.”

The common and underlying purpose of the record retention requirements of 10 CFR Part 50, Appendix A; 10 CFR Part 50, Appendix B; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c) is to ensure that the licensing and design basis of the facility is understood, documented, preserved and retrievable relative to establishing and maintaining the SSC safety functions for the life of the facility.

The current licensing basis defines those elements of SSC's and the associated licensing basis is maintained current by evaluating activities that have been found by the NRC to provide reasonable assurance of safe facility operations. The licensing basis is maintained current by evaluating changes against up-to-date information. As SONGS 2 and 3 SSCs are taken out of service, dismantled and disposed of, the licensing basis will be appropriately updated to reflect that these SSCs are no longer safety related. As these changes are implemented, retention of records associated with SSC's that are or will no longer be in the licensing bases serves no safety or regulatory purpose. Therefore, application of the record retention requirements specified above in current SONGS Units 2 and 3 circumstances does not serve the underlying purpose of the regulations.

- References:
1. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC,) dated June 12, 2013; Subject: Certification of Permanent Cessation of Power Operations, San Onofre Nuclear Generating Station, Units 2 and 3
 2. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC), dated June 28, 2013; Subject: Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station Unit 3
 3. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC), dated July 22, 2013; Subject: Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station Unit 2
 4. Letter from Thomas J. Palmisano (SCE), to U. S. Nuclear Regulatory Commission, dated September 23, 2014, Subject: Post-Shutdown Decommissioning Activities Report, San Onofre Nuclear Generating Station Units 2 and 3

Attachment 3

No Significant Hazards Determination and Environmental Impact Evaluation for SONGS Units 1, 2, and 3.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed exemption will exempt San Onofre Nuclear Generating Station (SONGS) Units 1, 2, and 3 from records retention requirements that are no longer relevant. Southern California Edison (SCE) has evaluated the proposed exemption request to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92:

- (1) *Does the proposed exemption involve a significant increase in the probability or consequences of an accident previously evaluated?*

SONGS Units 1, 2, and 3 have permanently ceased operation (References 1, 2, 3, 4 and 5). The proposed exemption has no effect on structures, systems, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed exemption would not increase the likelihood of the malfunction of any plant SSC.

The proposed exemption is administrative in nature and does not impact any of the accident scenarios postulated in the SONGS Unit 1 Defueled Safety Analysis Report (DSAR) or SONGS Units 2 and 3 Updated Final Safety Analysis Report (UFSAR). The exemption will not affect the probability of occurrence of previously evaluated accidents.

Therefore, the proposed exemption does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) *Does the proposed exemption create the possibility of a new or different kind of accident from any accident previously evaluated?*

The proposed exemption is administrative in nature and does not involve any change in the plant's design, configuration, or operation.

The proposed exemption does not result in any new mechanisms that could initiate damage to the relevant safety barriers for defueled plants (i.e., fuel cladding and spent fuel pool inventory). Therefore, the proposed exemption does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) *Does the proposed exemption involve a significant reduction in a margin of safety?*

The proposed exemption does not involve a change in the plant's design, configuration, or operation. The proposed exemption does not affect either the way in which SONGS Units 1, 2, and 3 SSCs perform their safety function or their design and licensing bases.

The proposed exemption does not adversely affect the inputs or assumptions of any of the design basis analyses.

The proposed exemption does not impact the safe storage of irradiated fuel. The proposed exemption does not affect any requirements for SSCs credited in the remaining analyses of applicable postulated accidents and as such, does not affect the margin of safety associated with these accident analyses.

Therefore, the proposed exemption does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed exemption does not involve a significant hazards consideration, and, accordingly, a finding of "no significant hazards consideration" is justified.

ENVIRONMENTAL IMPACT EVALUATION

10 CFR 51.22(c)(25) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed exemption requires no environmental assessment provided that (i) the exemption involves no significant hazards consideration, (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, (iii) there is no significant increase in individual or cumulative occupational radiation exposure, (iv) there is no significant construction impact; (v) there is no significant increase in the potential for or consequences from radiological accidents; and (vi) the requirements from which an exemption is sought involve (A) recordkeeping requirements, (B) reporting requirements, (C) inspection or surveillance requirements, (D) equipment servicing or maintenance scheduling requirements, (E) education, training, experience, qualification, requalification or other employment suitability requirements; (F) safeguard plans, and materials control and accounting inventory scheduling requirements, (G) scheduling requirements, (H) surety, insurance or indemnity requirements, or (I) other requirements of an administrative, managerial, or organizational nature.

SCE has reviewed the proposed exemption and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(25). Pursuant to 10 CFR 51.22, no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed exemption. The following is the basis for this determination:

- (i) The proposed exemption does not involve a significant hazards consideration, as described in the No Significant Hazards Consideration Determination above.
- (ii) There will be no significant change in the types or a significant increase in the amounts of any effluents released offsite because the exemption requests are administrative in nature and have no impact in the amount of effluents released offsite.
- (iii) The proposed exemption does not result in a significant increase to the individual or cumulative occupational radiation exposure because the exemption request involves requirements of an administrative nature. Therefore, the proposed exemption does not result in a significant increase to the individual or cumulative occupational radiation exposure.
- (iv) The proposed exemption involves no significant construction impact because the proposed exemption is administrative in nature.
- (v) The proposed exemption is administrative in nature and does not involve a significant increase in the potential for or consequences from radiological accidents.
- (vi) The proposed exemption involves recordkeeping requirements.

The proposed exemption meets the eligibility criteria in 10 CFR 51.22(c)(25) for categorical exclusion as explained above. Therefore, an environmental assessment or environmental impact statement is not required for this exemption request pursuant to 10 CFR 51.22(b).

- References:
1. Letter from W. C. Marsh, SCE, to U. S. Nuclear Regulatory Commission, dated March 8, 1993, Subject: Certification of Permanently Defueled Status, SONGS Unit 1
 2. Letter from W. C. Marsh, SCE, to U. S. Nuclear Regulatory Commission, dated March 10, 1993, Subject: Corrected Copy of Letter Certifying Permanently Defueled Status, SONGS Unit 1
 3. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC,) dated June 12, 2013; Subject: Certification of Permanent Cessation of Power Operations, San Onofre Nuclear Generating Station, Units 2 and 3
 4. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC,) dated June 28, 2013; Subject: Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station Unit 3
 5. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC), dated July 22, 2013; Subject: Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station Unit 2