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To: [Penny Ruvelas \(Penny.Ruvelas@noaa.gov\)](#)
Cc: [Dan Lawson \(Dan.Lawson@noaa.gov\)](#); [Chiharu Mori - NOAA Federal](#); [Robert Clapp \(Robert.Clapp@noaa.gov\)](#); ["Mark E Morgan"](#); [Albert Bates](#); [Snyder, Amy](#); [Watson, Bruce](#); [Elliott, Robert](#)
Subject: Supplement to Request to Reinitiate Endangered Species Act Section 7 Consultation for Decommissioning of San Onofre Nuclear Generating Station, Units 2 and 3
Date: Monday, December 6, 2021 8:58:00 AM
Attachments: [NRC Updated SONGS Biological Assessment for Decommissioning.pdf](#)
[SCE Technical Memorandum on ESA Consultation.pdf](#)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

Dear Ms. Ruvelas,

On September 30, 2021, the U.S. Nuclear Regulatory Commission (NRC) requested to reinitiate consultation with the National Marine Fisheries Service (NMFS) under the provisions of Section 7 of the Endangered Species Act of 1973, as amended (ESA), related to the decommissioning of San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS) in San Clemente, California. As part of this request, the NRC staff submitted a biological assessment that evaluated the potential impacts of SONGS decommissioning on federally listed species. You acknowledged receipt of this request on the same day, and I began coordinating with Mr. Dan Lawson of your staff soon thereafter.

On October 5, 2021, Southern California Edison Company (SCE), the NRC's licensee, submitted a technical memorandum to the NRC in support of the reinitiated consultation. In the memorandum, SCE requests that NMFS consider authorizing the incidental take of one of each of the four species of sea turtles present in the action area during the decommissioning period. SCE also presents its reasoning in support of this request. SCE's technical memorandum is attached for your consideration, as you deem to be appropriate.

The NRC staff reviewed SCE's technical memorandum and, as a result, updated its biological assessment. The updated biological assessment is attached. In Section 3.0 of the updated assessment, you will find clarified descriptions of the ocean water intake system and large organism excluder devices. In Section 7.1, the staff expanded its analysis of potential effects associated with water withdrawal. Despite these updates, the staff's conclusion remains the same regarding this potential effect—no sea turtles are expected to be entrained at SONGS during the decommissioning period. Therefore, the staff concludes that the proposed action of decommissioning may affect but is not likely to adversely affect sea turtles.

On October 13, 2021, Mr. Lawson provided the NRC staff with feedback on its biological assessment, including recommendations for expanding the assessment to provide additional information necessary to support NMFS's review. The updated biological assessment addresses these recommendations. Specifically, the updated assessment evaluates the potential impacts of the proposed action on the Guadalupe fur seal (*Arctocephalus townsendii*) blue whale (*Balaenoptera musculus*), fin whale (*B. physalus*), humpback whale (*Megaptera novaeangliae*), and gray whale (*Eschrichtius robustus*). Section 7.1 addresses the potential impacts of water withdrawal on prey of listed species, and Section 7.3 includes an expanded discussion of the potential impacts of hydrogen

sulfide gas releases during intake and discharge conduit removal activities.

I look forward to continuing to work with you and Mr. Lawson on this reinitiated consultation. Please reach out to me by phone or email with any questions.

Thank you,

Briana

Briana S. Arlene

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