

San Diego Gas & Electric Company
California Public Utilities Commission Docket No. A. 12-12-013
September 27, 2013

SDG&E Data Request No. 1
To The Coalition to Decommission San Onofre

The following data requests relate to the *Reply Testimony of the Coalition to Decommission San Onofre*, sponsored by Raymond Lutz and Martha Sullivan, (“CSDO Reply Testimony”), served on or about September 20, 2013, in the above-enumerated docket. SDG&E respectfully requests CSDO provide its best and complete responses to each of the requests and questions no later than ten days from the above-stated date. Because SDG&E intends to use CSDO’s responses to this Data Request in its Rebuttal Testimony and such testimony is due to be filed and served in this docket no later than October 11, 2013, if CSDO is unable to respond to certain of the requests and questions within ten days, SDG&E would appreciate CSDO providing, as soon as possible, an estimate of the time within which those responses can be delivered and, as to the responses for those requests and questions CSDO can complete within ten days, those responses when and as ready.

SDG&E will use the following abbreviations and references in posing its requests and questions:

- **2013 Decommission Cost Estimate for Units 2 & 3:** The updated cost estimate to decommission SONGS Units 2 & 3, upon which SCE-06 (Supplemental Testimony: SONGS 2 & Early Decommissioning Scenario) and SDG&E-7 (Reply Testimony of Brian Nelson) is based.
- **Mr. Raymond Lutz and Ms. Martha Sullivan:** the witnesses responsible for preparing and presenting their testimony in the above-enumerated docket.

In responding to the requests and questions raised below, SDG&E asks CSDO to provide each response directly below each request and question. Also, at either the beginning or the end of each response, please provide the name of the person providing the response and/or the person to whom follow-up questions, if any, can be addressed. Because SDG&E intends to use the responses provided by CSDO in a manner which may result in the disclosure of the information to the public, SDG&E requests that CSDO respond in full but specify what, if any, information should be treated as confidential and/or subject to privilege. With respect to any information CSDO marks as confidential or privileged, SDG&E will protect that information from disclosure in the same manner by which it would protect its own confidential or privileged information and will otherwise provide notice to CSDO in the event any party

would seek the disclosure of the information marked as confidential or privileged so that CSDO may also defend the confidentiality of or privileges relevant to the information.

Requests and Questions:

NOTE: SDG&E Consistently uses the incorrect abbreviation "CSDO" when they mean "CDSO". This has NOT been corrected in the questions below.

1. SDG&E understands CSDO to propose the creation of an independent volunteer Citizens Oversight Panel (COP) to provide "oversight and timely review" of decommissioning and spent nuclear fuel management activities at SONGS. (CSDO Reply Testimony at 10-11).
 - a. Is SDG&E's understanding correct?

The statement you made above does seem to reflect the intention of our proposal.

- b. Please describe what is meant by "oversight and timely review" of decommissioning and spent nuclear fuel management activities at SONGS.

The details of decommissioning and spent nuclear fuel activities have not yet been provided by Southern California Edison. However, based on the statements made in this and prior decommissioning cost review proceedings, there are general statements about the substantial activities planned in terms of project planning, project management, contracting, and review, for the decommissioning and demolition of the plant and the storage and management of spent fuel. Citizen oversight consists of making sure plans, budgets, and best practices are created and/or followed and that any change orders are appropriate and necessary. Citizen oversight is not intended to replace supervisory or quality assurance functions that are normally expected to be performed by SCE or their contractors. "Timely Review" means the COP is able to review proposed actions prior to implementing them as opposed to waiting for the retrospective review of the triennial proceeding. Processing the actions in the same time frame as SCE and their contractors will assist implementation of the "reasonable manager" criteria for reasonableness of those actions.

The primary purpose of the COP is to make sure the decommissioning funds are not misappropriated or fraudulently wasted and the health and safety of the public is adequately considered.

- c. Please describe the types of activities that CSDO envisions for the COP.

The COP would conduct meetings which are open to the public on a regular basis and review proposed plans, proposed major contracts, proposed budgets, and proposed change orders for decommissioning activities that rise above a threshold for review that can be set and adjusted by the COP. The COP will provide written response for each item reviewed, and prepare an annual report summarizing the activities of the COP. The COP may issue data requests to Southern California Edison and other related parties in an effort to understand the decisions being made, to thereby ensure appropriate and diligent use of the decommissioning funds.

- d. Please describe the power over the decommissioning and spent nuclear fuel management activities at SONGS that CSDO proposes for the COP.

The COP would preferably be authorized by the CPUC to operate on an advisory basis, but it would be able to escalate issues of concern to the CPUC when necessary. We recognize that many regulatory issues are under the purview of the CPUC while others are under the purview of the NRC, and the COP can help make sure that no items fall through the cracks.

- e. Please describe how CSDO proposes to ensure that the volunteer members of the COP will have the proper expertise to provide “oversight and timely review” of decommissioning and spent nuclear fuel management activities at SONGS.

The draft Bylaws of the COP specify that individuals with appropriate expertise are included on the panel. A call for volunteers is promulgated to the community, and volunteers evaluated according to the procedures and criteria as outlined in the draft bylaws. If the COP is established as an advisory body to the CPUC, then the CPUC would have ultimate authority to confirm members of the body. We expect that the utilities and other stakeholders will make recommendations so that the members of the COP do indeed have the necessary expertise.

Typically, citizen oversight panels, for example to provide oversight of construction projects at hospital and school districts, are supported by the firm that provides high-level project management. That firm is tasked with providing support to the COP such as, maintaining a web site and document repository so that the entire process is transparent and open.

However, it should be noted that the administration of the activities in terms of

monitoring the contracts and deliverables does not require the same expertise as actually performing the contracts.

2. SDG&E understands CSDO to suggest that the fuel pools should be retained at SONGS even after all spent fuel is moved into dry storage. (CSDO Reply Testimony at 12-13).
 - a. Is SDG&E's understanding correct?

The statement above appears to reflect our suggestion accurately.

- b. Please identify how long after all spent fuel is moved into dry storage CSDO proposes the fuel pools be retained.

A fuel pool should be available for the entirety of the time that nuclear waste is stored on site so as to be available in an emergency with the dry casks, such as unexpected degradation so that the canister -- which is the container inside the concrete horizontal containment structures -- could safely be immersed in water and then the nuclear material removed from the canister and probably moved to a new and uncompromised canister.

- c. Please describe how CSDO proposes that spent fuel in dry storage be moved back into fuel pools, and provide any supporting materials upon which CSDO's response is based.

According to the article cited in our reply testimony, there is a recognition that a dry transfer technology is something the industry sees as a needed capability. Until such technology exists, it is prudent to maintain a fuel pool on site. In proposed off-site ISFSI facilities, such as the one proposed by Private Fuel Storage (PFS) described in the response to Data Request 3B, a fuel handling capability is always part of the design and an essential feature.

- d. Please provide CSDO's cost/benefit analysis of this proposal.

SCE should prepare a cost-benefit analysis as part of their plans for decommissioning this site and maintaining a safe ISFSI.

- e. Please provide CSDO's calculations of how this proposal would impact the 2013 Decommission Cost Estimate for Units 2 & 3.

As a rough estimate, during the first 12 years of the decommissioning process, there would be no change. If a centralized ISFSI were available at about that time, the canisters in the on-site ISFSI could be moved to that facility and the fuel pool immediately decommissioned with the rest of the plant. Otherwise, one

existing fuel pool could be maintained with only modest increase in cost because it already exists.

3. SDG&E understands CSDO to suggest that dry casks full of spent fuel should be transported to a secondary temporary site without high-level seismic concerns or dense populations. (CSDO Reply Testimony at 13-14).
 - a. Is SDG&E's understanding correct?

The statement you make above does match our statement.

- b. Please identify the location of possible secondary temporary sites that would meet CSDO's requirements and any relevant federal, state or local requirements, and provide any supporting materials upon which CSDO's response is based.

Although the Blue Ribbon Commission on America's Nuclear Future (BRC -- see <http://www.BRC.gov>) did not recommend any site (for spent nuclear fuel (SNF) storage or disposal) in its final report issued in January 2012, they did recommend the development of one or more consolidated sites in the U.S. for long-term storage of SNF provided there is sufficient consent from local and state governments and affected Indian Tribes.

It is important to note that the plans for a private ISFSI site in Utah did include a fuel handling building to allow fuel to be removed and transferred from transportation casks to storage casks. [See <http://www.storenuclearfuel.com/new-sites/private-fuel-storage/>]

- c. Please provide CSDO's cost/benefit analysis of this proposal.

Our Reply Testimony referenced a rough cost-benefit analysis (by the Brattle Group) that shows that nationwide, there would be a savings of about \$200 million per year in at-reactor ISFSI operating costs by consolidating to temporary storage locations. We are not sure how high-burn-up fuel impacts these estimates.

- d. Please provide CSDO's calculations of how this proposal would impact the 2013 Decommission Cost Estimate for Units 2 & 3.

Consolidation of the ISFSI at another site would mean that the ISFSI would not need to be maintained at the San Onofre site and therefore no fuel pool would be required. Long term, this should be a cost-savings alternative, but more importantly, it respects the safety concerns of the community due to the high-

population density of the location, proximity to the ocean, and seismic concerns of the area.

4. SDG&E understands CSDO to propose that “dual-purpose casks” should be used at SONGS for spent fuel. (CSDO Reply Testimony at 15).
 - a. Is SDG&E’s understanding correct?

We understand the terminology is "Dual-purpose" which means the same cask can be used in a stationary site and they can be transported as well. So with that correction, your statement seems correct.

- b. Please provide CSDO’s cost/benefit analysis of this proposal.

The NRC stated at the September 26, 2013 public meeting in La Costa that the casks approved for use and being used are "Dual-Purpose." To the extent that this statement is true and addresses our concerns regarding high-burnup fuel, then there may be no additional cost.

According to the NRC document "Spent Fuel Project Office Interim Staff Guidance - 11, Revision 3 -- Issue: Cladding Considerations for the Transportation and Storage of Spent Fuel" [<http://www.nrc.gov/reading-rm/doc-collections/isg/isg-11R3.pdf>] issues have been raised regarding the usability of these casks for high-burnup fuel, and steps may need to be taken to address these issues.

If these casks are not approved for the transport of high-burnup SNF, then there may be additional costs to deal with this, and further analysis should be performed by SCE as a part of their decommissioning plan, including a cost-benefit analysis for the various options.

- c. Please provide CSDO’s calculations of how this proposal would impact the 2013 Decommission Cost Estimate for Units 2 & 3.

See answer to 4b.

