

UNITED STATES MARINE CORPS

MARINE CORPS INSTALLATIONS WEST-MARINE CORPS BASE BOX 555010 CAMP PENDLETON, CALIFORNIA 92055-5010

> 11011 CG March 17, 2021

Mr. Kevin M. Payne President and Chief Executive Officer Southern California Edison 2244 Walnut Grove Ave Rosemead, CA 91770

Dear Mr. Payne:

This letter provides Southern California Edison (SCE) Marine Corps comments as a principal stakeholder responding to the Strategic Plan for Disposition of San Onofre Nuclear Generating Station (SONGS) Spent Nuclear Fuel (SNF), the SONGS SNF Conceptual Transportation Plan, and the SCE Action Plan. We request that our comments being considered with the Strategic Plan documents. We also request that this letter be shared with the individual members of the SONGS Community Engagement Panel.

While we understand the current necessity for SNF storage on the SCE/SONGS easement, the perpetual storage of SNF on Marine Corps Base, Camp Pendleton, is inconsistent with the Marine Corps' national defense mission. The installation is the nation's largest West Coast expeditionary training site, and it supports Marine combat readiness across the range of military operations. Because the perpetual storage of SNF on the easement prevents the Marine Corps from using the site to execute its mission, we support the expeditious relocation of SNF to a storage facility off the installation. For the same reason, we will not entertain proposals to relocate SNF elsewhere on the installation.

We also support current SCE/SONGS co-owner actions to find a commercially reasonable pathway to relocate the SNF off the installation. The Marine Corps is a principal stakeholder in relocating SONGS SNF, and we anticipate that SCE and SONGS leadership would confer with us as soon as practicable in the transportation planning process. We understand that transporting SNF requires advance planning and a thorough understanding of applicable regulatory, technical, and logistical requirements. Therefore, we encourage SCE to demonstrate the commercial reasonableness of relocating SNF off the base by shipping a single container of SNF to a site permitted to receive it. If this cannot be accomplished, we would appreciate SCE briefly explaining to us, in writing, the regulatory, technical, or logistical reasons for this.

Finally, we continue to expect that SCE/SONGS co-owners will remove all of the improvements installed or constructed on the easement site pursuant to the terms of the easement. We also expect the easement site to be returned to the Marine Corps in an unrestricted use and unrestricted exposure condition.

Sincerely,

DAN CONLEY

Brigadier General

Commanding General

Marine Corps Installations West-

Marine Corps Base, Camp Pendleton