

PROJECT MEMORANDUM

SAN ONOFRE NUCLEAR GENERATING STATION (SONGS) UNITS 2 AND 3 DECOMMISSIONING PROJECT

Date: March 22, 2022
To: Cynthia Herzog, Senior Environmental Scientist, CSLC
From: Vida Strong, Aspen Project Manager
Subject: Monitoring Report #23: February 2022

Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison's (SCE) San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Decommissioning Project.

It should be noted that SCE has distributed specific protocols related to the current COVID-19 pandemic. The purpose of these protocols is to protect all SONGS workers by providing guidance to help control the spread of infectious disease within the SONGS workforce.

CSLC Monitoring: Jamie Miner, Lead Environmental Monitor (LEM), was onsite on February 17, 2022, and Elliot D'Antin, Environmental Monitor (EM), was onsite on February 28, 2022.

This report addresses the SONGS Project through two major components:

- **Onshore Activities.** Major onshore activities will occur at the existing facility within an approximately 84-acre project site. Onshore work will include, but not be limited to, the following: the establishment of equipment and material staging yards; the reconfiguration and/or reinforcement of site access roads and entrances; the installation, modifications, or upgrades to rail infrastructure; the construction of temporary containment enclosures to perform decontamination and dismantlement tasks; the completion of radiological remediation pursuant to applicable U.S. Nuclear Regulatory Commission regulations; the segmentation and packaging of reactor vessel internals for shipment and disposal; the removal and disposal of large components (e.g., reactor vessels, steam generators, pressurizers, turbine-generators); the dismantlement of container buildings; the removal of all remaining above-ground structures; and the partial removal of subsurface structures, systems, and components.
- **Offshore Activities.** Major offshore activities will occur within an approximately 21 acres of tide and submerged lands immediately southwest of the site. Offshore work will include the removal of two primary offshore intake structures (POIS), two auxiliary offshore intake structures (AOIS), 12 diffuser structures, 23 manhole access port structures (MAPS), one fish return conduit, and five buoys (3 environmental monitoring buoys and 2 navigational buoys) and their attached instruments and anchors.

Summary of Onshore Construction Activities

The following briefly summarizes the general onshore construction activities that have been recently completed, are currently scheduled, or are scheduled for the near future:

- **Utility Isolations (Ongoing).** These activities include confirming existing utility (e.g., water, electricity, sewer) locations and performing potential shallow excavations to conduct air gapping or capping prior to demolition of above grade structures. The remaining subsurface utility infrastructure, along with building slabs and foundations, will be subsequently removed at a later date. Utility isolations will be ongoing throughout decommissioning and demolition activities and will be performed by various subcontractors.
- **Soil Sampling (Ongoing).** In order to meet the requirements of a Corrective Action Consent Agreement with the California Department of Toxic Substances Control (DTSC), soil sampling was initiated in September 2021 and will be ongoing throughout onshore demolition activities.
- **Groundwater Testing Well Installation (Ongoing).** As part of the Corrective Action Consent Agreement with the DTSC, ground water testing wells will require installation and monitoring at various locations across the Project site. These activities are expected to continue on an as needed basis throughout the duration of onshore demolition activities.
- **Road and Rail Repairs and Installation (Ongoing).** Various road and rail repairs are being performed to facilitate ingress/egress and importing and exporting of materials and equipment, as well as construction of two additional rail tracks to facilitate ingress/egress and importing and exporting of materials and equipment. Road repairs are expected to occur on an as needed basis throughout the duration of onshore demolition activities. Rail installation is expected to be completed by the end of February 2022 and rail removal will occur upon completion of onshore demolition activities.
- **Demolition Activities (Ongoing).** Demolition activities consist of above-ground infrastructure and at or below-grade slabs and foundations.
- **Site Grading (Ongoing).** Site grading for stabilization and storm drain installation is ongoing and will continue throughout the duration of onshore demolition activities.
- **Concrete Crushing (Ongoing).** Concrete crushing equipment was brought onsite and activities were initiated in late-July 2021. These activities are expected to continue throughout demolition of above and below-ground project components.
- **Asbestos Abatement Inside Units 2 and 3 Containment and Above-Ground Buildings (Ongoing).** Activities will occur in two broad phases. The first phase included the abatement of friable asbestos and the removal of related materials and equipment. The second phase includes the abatement of non-friable asbestos and the cleaning of affected areas within Units 2 and 3 and above ground buildings prior to deconstruction. San Diego Air Pollution District (SDAPD) has been notified of start date and will provide spot-check inspections. Initial asbestos abatement activities associated with the first phase were conducted by Bay View Environmental. They began on February 24, 2020 and were completed in mid-November 2020. Overall abatement activities associated with the second phase are currently being conducted by Brandenburg Construction and are ongoing to accommodate demolition activities.
- **Material and Equipment Mobilization (Ongoing).** Brandenburg Construction is the primary demolition contractor. Mobilizing of materials and equipment to their material and staging yard in Parking Lot 4 was initiated in November 2020 and is ongoing.

- **Debris Removal (Ongoing).** Debris removal associated with all construction activities consist of mixed materials and are being conducted by rail car and haul trucks. Debris removal activities are expected to occur throughout the duration of the project.
- **Tsunami Gate Installation (Completed).** Tsunami gate installation was completed in January 2022 which will properly manage the flow of water within the floor bays of Units 2 and 3 and allow crews to clean the floor bays of ocean debris.

Current Offshore Construction Schedule

Offshore construction activities are anticipated to start in 2024.

Summary of Construction and Compliance Activities for the Reporting Period

The following construction activities occurred during the reporting period:

- **Groundwater Testing Well Installation.** Hand augers and a mobile drill rig were utilized to drill at numerous locations across the Project site where testing wells were subsequently installed. Groundwater testing well installation was nearly completed during the reporting period with only one well requiring installation at the end of the reporting period.
- **Utility Isolations.** Potholes were excavated to find utility lines at the MUDA, South Yard Facility Areas, and Switch Yard Road locations.
- **Soil Sampling.** Soil sampling included the use of small excavators and hand augers to collect bore samples at numerous locations throughout the reporting period for radiation testing and sample collection. 176 of 201 soil borings have been completed at the end of the reporting period (Photo 1).
- **Demolition Activities.** Above-ground structural and slab demolition activities are currently ongoing. Implosion of the AWS Building was initiated in early July and demolition down to the foundations was completed in October 2021. Internal demolition of the Unit 2 and 3 reactor vessels continued during the reporting period and included the dismantlement of the Unit 2 reactor head, preparation work for the dismantlement of the Unit 3 reactor head, core drilling, and waste removal (Photo 2).
- **Site Grading.** These activities included minor grading of sloped banks and excavation for storm drain installations at various locations throughout the reporting period.
- **Road and Rail Repairs and Installation (Ongoing).** Two additional rail tracks, and a rail yard have been constructed to facilitate ingress/egress and importing and exporting of materials and equipment (Photo 3). Activities performed during the reporting period included demolition and removal of asphalt, hauling of rail track and debris, grading of exposed soils within NOCA, construction of a rail bed, and assembly and installation of the rail tracks. Installation of the rails was completed during the reporting period. Asphalt will be laid to fix damaged parking lots and access roads, and to stabilize former building and transformer and other miscellaneous locations across the site (Photo 5).

- **Tsunami Gates.** Divers and crane operators completed installation of the tsunami gates in January 2022. Additional work to facilitate the clean-up of floor bays of Units 2 & 3 continued through the reporting period.
- **Asbestos Abatement Inside Units 2 and 3 Containment and Above-Ground Buildings.** Phase 2 abatement activities continued inside the Unit 2 and 3 containment domes and associated buildings throughout the reporting period. Activities associated with this Project component that were conducted during the reporting period included the second phase of abatement from Units 2 and 3 containment domes, installation of equipment, and dismantling of Unit 2 reactor vessel internals.
- **Concrete Crushing/Sorting.** Concrete crushing was halted during the reporting period as the concrete crusher was removed offsite. The machine will be brought back at a later date to continue concrete crushing efforts. Material sorting continued throughout the reporting period and is ongoing (Photo 4).
- **Debris Removal.** Debris removal continued via truck and railcar throughout the reporting period and is ongoing.
- **Material Equipment and Mobilization.** Material equipment and mobilization continued throughout the reporting period and is ongoing.

Table 1a and Table 1b provide an overview of Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) for the SONGS Project onshore and offshore activities, respectively, and related compliance information for the reporting period.

Table 1a – MMs/APMs and Compliance Information for Onshore Activities

MM/APM Description	Related Compliance Information
<i>Air Quality</i>	
MM AQ-3a: Off-Road Equipment Emissions	<ul style="list-style-type: none"> • Tier 4 engines shall be used; however, exceptions include (1) heavy equipment with engines greater than 50 horsepower that does not meet Tier 4 requirements can be utilized on an interim basis until the end of 2020; (2) off-road equipment items that are a specialty, or unique, piece of equipment that cannot be found with a Tier 4 or better engine after a due diligence search that includes contacting at least three relevant equipment rental firms; and, (3) an off-road equipment item that shall be used for a total of no more than ten days. • On November 4, 2021, SCE submitted documentation for use of a heavy duty forklift that does not meet Tier 4 requirements. Per number (2), above, the documentation provided communication between the contractor and three separate rental agencies indicating that the crane was the only piece of equipment available. • According to SCE, there were no compliance issues associated with MM AQ-3a identified during the reporting period and a log will be maintained for usage hours.
APM-3: Vehicle Emission Reductions	<ul style="list-style-type: none"> • According to SCE, there were no compliance issues associated with APM-3 identified during the reporting period.
APM-4: Dust Suppression	<ul style="list-style-type: none"> • According to SCE, there were no compliance issues associated with APM-4 identified during the reporting period.
APM-5: Vehicle Speeds	<ul style="list-style-type: none"> • According to SCE, no unpaved roads are expected to be used for current project construction activities. • According to SCE, there were no compliance issues associated with APM-5 identified during the reporting period.

MM/APM Description	Related Compliance Information
APM-6: Track-Out to Public Streets	<ul style="list-style-type: none"> According to SCE, there were no compliance issues associated with APM-6 identified during the reporting period.
APM-7: Tarping Trucks	<ul style="list-style-type: none"> According to SCE, there were no compliance issues associated with APM-7 identified during the reporting period.
Biological Resources	
MM BIO-1a: Worker Environmental Awareness Program	<ul style="list-style-type: none"> The WEAP training was finalized and approved in November 2019. Sign-in sheets for crew WEAP training are being provided to CSLC as trainings are conducted. WEAP training was conducted on February 1, 2, 7, 9, 14, 16, 24, and 28. A total of 60 new employees received WEAP training during the reporting period.
MM BIO-1b: Weed Management	<ul style="list-style-type: none"> This measure does not go into effect until post-construction activities are implemented.
MM BIO-1c: Rare Plant Surveys	<ul style="list-style-type: none"> A CSLC-approved botanist conducted protocol-level rare plant surveys in March, May, and September 2020. The results of these surveys are valid for a period of three years. Additional rare plant surveys are scheduled to recommence in 2023. To date, no rare plants (as defined by MM BIO-1c) have been identified during surveys or throughout the reporting period. Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2a: Special-Status Reptiles and Amphibians	<ul style="list-style-type: none"> Surveys for 2022 are to occur based on upcoming construction schedules. No special-status reptiles or amphibians were observed throughout the reporting period. Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2b: Surveys and Monitoring for Nesting Birds	<ul style="list-style-type: none"> Although not a specified requirement of MM BIO-2b, SCE is implementing a Nesting Bird Management Plan that details procedures to comply with federal and State regulations and permits and identifies measures pertaining to nesting birds encountered during the project. On August 17, 2020, SCE submitted a variance request to include implementation of SCE's Special Use Permit conditions for nest removals during critical decommissioning work activities (see Table 3). The variance was approved by CSLC on August 19, 2020. As of the end of the reporting period, there are no active nests onsite. Periodic biological sweeps and monitoring are currently ongoing. Three surveys for nesting birds have been scheduled for March 31, April 13, and May 23, 2022. A summary report for the survey is expected June 23, 2022.
MM BIO-2c: Burrowing Owl	<ul style="list-style-type: none"> SCE provided language in the Burrowing Owl 2021 Survey Report that surveys would no longer be required due to a lack of suitable nesting habitat and lack of breeding records in the region. This report was submitted to CSLC and CDFW on July 19, 2021. No individual owls, active burrows, or nests were identified during the reporting period. Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2d: Western Snowy Plover/California Least Tern	<ul style="list-style-type: none"> On July 17, 2020, SCE submitted a variance request for the temporary suspension of surveys for western snowy plover and California least tern (see Table 3). The variance was approved by CSLC on July 17, 2020. No western snowy plovers were detected throughout the reporting period. Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2e: Coastal California Gnatcatcher	<ul style="list-style-type: none"> The six required protocol surveys for the 2022 season have been scheduled for: March 25; April 14, 29; May 11, 20; and June 3. A summary report of the survey is expected June 3, 2022. MM BIO-2e states that prescribed buffers for coastal California gnatcatcher active nests may be adjusted by the SCE biologists in consultation with USFWS and CDFW. The Aspen LEM received, via email on April 28, 2020, the documented coordination between SCE and these agencies that identifies specific measures that will be implemented in order to avoid implementing nesting buffers for this species.

MM/APM Description	Related Compliance Information
	<ul style="list-style-type: none"> • No active California gnatcatcher nests or individuals were identified during the reporting period. • Periodic biological sweeps and monitoring are currently ongoing.
MM BIO-2f: Noise Minimization Plan	<ul style="list-style-type: none"> • The Noise Minimization Plan was finalized and approved in November 2019. • Noise monitoring will continue throughout the 2022 nesting bird season, if required.
MM BIO-3: Sensitive Bat Species	<ul style="list-style-type: none"> • Surveys for sensitive bat species are required within 14 days prior to dismantling and external demolition activities of the onshore site facilities. • A bat survey associated with the demolition of the Unit 3 turbine building was conducted on February 2, 2022 with negative results. The report documenting the negative results and methodology was provided on February 11, 2022. • No bats were observed or detected during the reporting period.
MM BIO-4: Potential Waters of the U.S./State	<ul style="list-style-type: none"> • CSLC has requested information regarding the water agencies jurisdictional approach for a concrete lined ditch that occurs within the site. According to SCE, any work activities associated with the concrete lined ditch are not expected to occur for several years. Consequently, SCE has yet to complete coordination with the water agencies regarding this issue and is aware that this coordination is required prior to any such activities.
APM-8: Nesting Bird Deterrents	<ul style="list-style-type: none"> • The installation of additional deterrents was discussed between the LEM and SCE staff during the 2020 nesting season and SCE is aware that consultation with the LEM and CDFW (if requested) will be required prior to any future installation. The LEM has specifically requested consultation prior to the installation of any exclusionary netting located within or immediately adjacent to habitats dominated by native vegetation and/or near any active nests. • On January 10, 2022, notification was provided to the agency regarding the use of laser technology as a nesting bird deterrent in accordance with the NBMP. • Bird exclusionary netting has been installed at locations dominated by developed features and lacking native vegetation. • Supplemental installation of nesting bird deterrents is continuing prior to the 2022 nesting bird season (Photo 6).
Cultural and Paleontological Resources	
MM CR/TCR-2a: Archaeological and Tribal Monitoring	<ul style="list-style-type: none"> • Archeological monitors were present during ground-disturbing activities associated with soil sampling, demolition, grading, and road/rail repairs during the reporting period. • According to SCE, no archaeological or tribal resources were identified during the reporting period.
MM CR/TCR-2b: Unanticipated Cultural/Tribal Resources	<ul style="list-style-type: none"> • On October 19, 2020, the CSLC received an email notification from SCE that a Treatment Plan for unanticipated tribal resources had been approved by the Rincon Band of Luiseno Indians. The Final Treatment Plan was submitted to the CSLC via email on December 11, 2020. The Rincon Band of Luiseno Indians concurred with the Final Plan and provided no additional comments via email on December 28, 2021. • SCE held a tribal outreach call on February 18, 2022. As a result of the meeting, all parties in attendance agreed to move meetings to a quarterly basis due to a lack of upcoming ground disturbance activities.
MM CR-4a: Paleontological Monitoring	<ul style="list-style-type: none"> • Paleontological monitors were present for all ground-disturbing activities associated with soil sampling, demolition, grading, and road/rail repairs during the reporting period. • According to SCE, no paleontological resources were identified during the reporting period.
MM CR-4b: Unanticipated Paleontological Resources	<ul style="list-style-type: none"> • According to SCE, no unanticipated paleontological resources were identified during the reporting period.
APM-10: Cultural Resources Protection	<ul style="list-style-type: none"> • Archeological monitors were present for all ground-disturbing activities associated with soil sampling, demolition, grading, and road/rail repairs during the reporting period. • According to SCE, no resources were identified during the reporting period.

MM/APM Description	Related Compliance Information
APM-11: Appropriate Treatment of Human Remains	<ul style="list-style-type: none"> According to SCE, no human remains were identified during the reporting period.
<i>Hazardous and Radiological Materials</i>	
MM HAZ-4: Facility Hazardous Waste Permit Extension	<ul style="list-style-type: none"> SCE informed the LEM that the current Facility Hazardous Waste Permit is active until May 23, 2026. On August 20, 2020, SCE submitted an email notification to CSLC that it had entered into a Corrective Action Consent Agreement with the California Department of Toxic Substances Control (DTSC) on August 23, 2020, which is a major step towards closing out the current Facility Hazardous Permit.
MM HAZ-5: Worker Registration/Certification	<ul style="list-style-type: none"> Required registrations/certifications are being provided to CSLC and uploaded to SCE's FRED. The most recent registrations/certifications were submitted to CSLC on February 15, 2022. The next submittal is expected on April 18, 2022.
MM HAZ-6: Soil and Groundwater Site Characterization and Soil Management Plan	<ul style="list-style-type: none"> The Soil and Groundwater Site Characterization and Soil Management Plan (for non-radiological contamination testing for subsurface soil and groundwater) was finalized and approved in January 2020. Pursuant to requirements of the Soil Management Plan, SCE has continued coordination with the DTSC in accordance with the Corrective Action Consent Agreement. Plans approved by the DTSC, to date, include a Quality Assurance Project Plan, Background Work Plan, and the Resource Conservation and Recovery Act (RCRA) Facility Investigation Work Plan. The most recent Quarterly Soil Management Report was submitted to CSLC on January 14, 2022 (amended and submitted on January 20, 2022). The next report is expected no later than mid-April 2022. Installation of site soil borings and monitoring wells continued during the reporting period. According to SCE, perimeter air monitoring and ground disturbance monitoring is ongoing and in accordance with the Soil Management Plan.
APM-1: Waste Management Program	<ul style="list-style-type: none"> The Waste Management Program was finalized and approved in November 2019. Implementation of Waste Management Program included characterization, handling, transport, and disposal of various waste streams generated at the site, including removal of asbestos, oils, fluorescent light ballasts, and universal waste such as mercury bulbs, thermostats, and batteries. Radiological waste from within the containment structures continues to be removed and disposed offsite by railcar.
APM-2: Hazardous Materials Business Plan (HMBP)	<ul style="list-style-type: none"> The HMBP was finalized and approved in November 2019. As required, the 2021 annual update of the HMBP is expected no later than March 2022.
APM-12: Stormwater Pollution Prevention Plan (SWPPP)	<ul style="list-style-type: none"> The project SWPPP was prepared in November 2019 and is currently available in the SWRCB's Stormwater Multiple Applications and Reports Tracking System (SMARTS). There were no compliance issues associated with SWPPP implementation observed or reported during the reporting period.
APM-13: Spill Prevention Control and Countermeasure (SPCC) Plan	<ul style="list-style-type: none"> The SPCC Plan was finalized and approved in November 2019. According to SCE, no reportable spills were identified during the reporting period.
APM-14: Spill Contingency Plan	<ul style="list-style-type: none"> According to SCE, no reportable spills were identified during the reporting period.
APM-23: ISFSI Radiation Monitoring	<ul style="list-style-type: none"> According to SCE, an ISFSI Radiation Monitoring System is installed and has been in effect since February 1, 2020. The Monitoring Report for January was submitted to CSLC on February 9, 2022. The Monitoring Report for February is expected no later than March 10, 2022.
<i>Hydrology and Water Quality</i>	

MM/APM Description	Related Compliance Information
MM WQ-4: Onshore Site Stabilization Plan	<ul style="list-style-type: none"> • The Onshore Site Stabilization Plan was finalized and approved in December 2019. • Implementation of this plan is not required until the conclusion of onshore project activities and remains in effect until the beginning of future activities.
MM WQ-5: Walkway Flood Protection Plan	<ul style="list-style-type: none"> • The Walkway Flood Protection Plan was finalized and approved in December 2019. • The public walkway is located along the base of the seawall between the Project's onshore and offshore components. • On May 18, 2021, SCE submitted an Addendum Memorandum to the Plan that documented design changes associated with the concrete berms. According to the Addendum, the north and south openings at the top of the seawall were blocked as of May 3, 2021, and discharges onto the public walkway are now permanently prevented.
Land Use and Planning	
MM LU-2a: Deconstruction Liaison	<ul style="list-style-type: none"> • The LEM confirmed that SCE has appointed a Deconstruction Liaison. • Details associated with the Deconstruction Liaison are publicly available at the following website: www.songscommunity.com • As required, SCE submitted a summary documentation of all complaints, comments, and concerns from the fourth quarter of 2021 that were communicated to the Deconstruction Liaison via email on January 28, 2022. The next summary is expected to be submitted mid/ late-April 2022.
MM LU-2b: Advance Notice of Deconstruction	<ul style="list-style-type: none"> • According to SCE, advance notifications were distributed in January 2020.
MM LU-2c: Quarterly Deconstruction Updates	<ul style="list-style-type: none"> • SCE submitted the Quarterly Deconstruction Update that covered activities from the fourth quarter of 2021 on January 24, 2022. According to SCE, these updates were mailed to all residents within a five-mile radius of the project and were posted on the project public website. The next Quarterly Deconstruction Update is expected mid-April 2022.
Recreation and Public Access	
MM REC-1a: Public Notification	<ul style="list-style-type: none"> • According to SCE, the initial public notification was provided in January 2020. • A public website is available at www.songscommunity.com
MM REC-1b: Public Access Plan	<ul style="list-style-type: none"> • The Public Access Plan was finalized and approved in November 2019.
Transportation and Traffic	
APM-19: Emergency Services Access	<ul style="list-style-type: none"> • According to SCE, there were no road/lane closures implemented during the reporting period.
APM-20: Oversize/Overweight Loads	<ul style="list-style-type: none"> • According to SCE, an existing system is in place, with concurrence from the California Department of Parks and Recreation, to calculate oversize/overweight loads that are transported to and/or from the site via Basilone Road and across associated bridges (San Onofre Creek and Railroad Overhead) and to ensure that these loads do not exceed established limitations or safe operating conditions. This includes a temporary weigh station that was installed during the reporting period.
APM-21: Pedestrian and Bicycle Access and Safety	<ul style="list-style-type: none"> • No activities were conducted during the reporting period that are applicable.

Table 1b – MMs/APMs and Compliance Information for Offshore Activities

MM/APM Description	Related Compliance Information
<i>Air Quality</i>	
MM AQ-3b: Marine Vessel Emissions	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
<i>Biological Resources</i>	
MM BIO-9: Hydrogen Sulfide (H ₂ S) Gas Control Plan	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
MM BIO-10: Anchoring Plan	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
MM BIO-11: Marine Mammal and Sea Turtle Mitigation and Monitoring Plan	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
MM BIO-12: Invasive Non-Native Aquatic Species (NAS)	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
APM-9: Conduit Work Plan	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
APM-15: Dredging Plan	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
APM-16: Turbidity Monitoring	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
APM-17 Offshore Spill Response Plan	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
<i>Cultural and Paleontological Resources</i>	
MM CR/TCR-2c: Cultural Resource Identification during Offshore Geophysical Surveys	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
APM-10: Cultural Resources Protection	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
APM-11: Appropriate Treatment of Human Remains	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
<i>Hazardous and Radiological Materials</i>	
MM HAZ-4: Facility Hazardous Waste Permit Extension	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
MM HAZ-5: Worker Registration/Certification	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
APM-1: Waste Management Program	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
<i>Recreation and Public Access</i>	
APM-18: Notification to Local Mariners	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.
<i>Transportation and Traffic</i>	
APM-22: Private Aids to Navigation	<ul style="list-style-type: none"> • No offshore activities are currently scheduled to occur.

Compliance Summary

There were no compliance issues reported by SCE during the reporting period. Table 2 summarizes the non-compliance incidents to date.

Table 2 – MMs/APMs Non-Compliance Information

Date Issued	Regulatory Requirement	Description
September 29, 2020	MM BIO-1a	A SCE inspector observed a SDS worker performing activities without a WEAP Training decal on his helmet. The inspector questioned the SDS foreman if the worker had attended WEAP Training prior to working onsite and it was determined that he had not. Worker was immediately pulled from duty and provided required WEAP Training the same day. This incident was self-reported by SCE and submitted to CSLC on October 1, 2020.
July 8, 2021	MM BIO-1a	SCE self-reported two crane operators onsite without required WEAP training. Both operators were immediately trained the following days. Additional corrective actions included updating onboarding procedures for training requirements and verification.

Variance Requests

There were no variance requests submitted during the reporting period. Table 3 provides a summary of all variance requests and approvals to date.

Table 3 – Variance Requests and Approvals Summary

Variance #	Date Requested	Date Approved	Description
1	July 17, 2020	July 17, 2020	SCE requested a variance to MM BIO-2d to postpone any further surveys for western snowy plover and California least tern until the first breeding season prior to the start of offshore activities. SCE provided CSLC with documented concurrence (based on previous negative survey results and limited suitable habitat) by USFWS and CDFW for this request.
2	August 17, 2020	August 19, 2020	SCE requested a variance to MM BIO-2b only during emergency situations to allow use of the Special Purpose Utility Permit (SPUT) in handling of specific migratory birds, nests, and eggs. The SPUT is only utilized where the safety of migratory birds, nests, or eggs pose a threat of fire hazard, mechanical failure, or power outage.

Future Construction & Compliance Activities

The following construction and compliance activities are expected to occur within the next several weeks:

- Various utility isolations (as needed).
- Road and rail improvements/repairs (as needed).
- Demolition of Unit 3 Turbine Building and 12-kV distribution line
- Continuation of asbestos abatement inside Containment Units 2 and 3 and above-ground buildings.

PROJECT PHOTOGRAPHS



Photo 1 –Using mobile drill rig to collect soil samples for testing
(February 17, 2022).



Photo 2 – Demolition at U2 (February 17, 2022).



Photo 3 – Rail yard installation (February 17, 2022).



Photo 4 – Material sorting (February 28, 2022).



Photo 5 – Asphalt application at rail tracks (February 28, 2022).



Photo 6 – Bird deterrent (February 28, 2022).