

November 12, 2019

The Honorable Scott Peters
U.S. House of Representatives
2338 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Mike Levin
U.S. House of Representatives
1626 Longworth House Office Building
Washington, D.C. 20515

The Honorable Harley Rouda
U.S. House of Representatives
2300 Rayburn House Office Building
Washington, D.C. 20515

Dear Representatives Levin, Peters, and Rouda,

During a May 29 meeting with Rep. Levin and members of his task force, we discussed Southern California Edison's (SCE) ongoing spent fuel storage efforts at the San Onofre Nuclear Generating Station (SONGS) and developments in spent fuel storage. At Rep. Levin's suggestion, SCE agreed to "refresh" its evaluation of spent fuel technology by reviewing meaningful, factual and science-based changes that haven't already been considered by SCE, and to share our conclusions with the task force upon completion. The accompanying document, "Overview of Dry Spent Fuel Storage at San Onofre Nuclear Generating Station," is the result of this effort.

SCE agreed to accept factual information that the task force deemed as potentially illuminating, to have further internal dialogue around a host of related topics, and to research commercial changes a task force member reported have occurred with a cask vendor. Through our continual monitoring of pertinent technology, regulatory and commercial changes, coupled with regulatory and expert input, SCE believes our current plan for fuel transfer, storage, monitoring and eventual transport off-site is appropriate.

In 2014, after a thorough and rigorous review of existing spent fuel storage technologies, SCE chose the Holtec UMAX system to store the remaining spent nuclear fuel on site at SONGS. Loading of spent fuel into the UMAX system began in 2018 and is anticipated to end in mid-2020. Today, more than 50% of the current loading campaign is complete.

The evaluation SCE performed before selecting the Holtec UMAX dry storage system was informed by industry experts, SCE engineers and staff, and engagement with the community. Ultimately, SCE focused on several key design criteria, including canisters that are licensed in the U.S. for both storage and transportation, and designs that meet SCE's stringent safety requirements, including enhanced canister thickness and seismic qualifications. Additional SCE requirements include the use of 316L stainless steel, which is better for a coastal environment, and laser peening the canister welds, which reduces the potential for chloride-induced stress corrosion cracking. As a result of our work in conjunction with this report, SCE reaffirms its choice of the UMAX system as the appropriate solution for SONGS spent fuel storage.

Some members of Rep. Levin's task force raised issues regarding dry fuel storage systems, both in use at SONGS and in general. The topics included canister-wall thickness; the opportunity for an "explosive hydrogen" event; inspection and repair methods and capabilities; and the applicable engineering codes. We address these assertions in Section IV of this paper.

I want to emphasize that the safety of employees and the public is SCE's number one value. Spent fuel has been safely stored on site at SONGS since 1970, first in spent fuel pools (wet storage) and in dry storage beginning in 2003. Approximately 3,000 spent fuel containers (canisters and casks) are located at approximately 80 sites across the country. The safety record of these storage facilities is excellent. No one has ever been harmed by spent fuel from a commercial nuclear energy facility, nor has any radioactive contamination been released from a canister. The same robust canister design that protects the fuel so well also serves to protect the environment. Please know that SCE remains committed to continuing this excellent safety record.

Should you have questions regarding this report, please contact Amy Pressler at 202-393-3075.

Sincerely,

A handwritten signature in cursive script, appearing to read "Caroline Choi".

Caroline Choi
Senior Vice President
Edison International and Southern California Edison

CC: Senator Dianne Feinstein
Senator Kamala Harris
Rep. Ken Calvert
Rep. Katie Porter