

April 10, 2020

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

Dear Representative Levin,

Thank you for your recent letter to Edison International President and CEO Pedro J. Pizarro regarding the San Onofre Nuclear Generating Station (SONGS). As Dr. Pizarro indicated in his April 2 letter to you, he asked me to follow up with answers to your questions about the SONGS response to the COVID-19 pandemic, as well as the wastewater release that occurred on March 25.

The safety of our customers, workforce and the public remains our top priority. We have instituted comprehensive measures on site to maintain the health and safety of our critical workforce. I have outlined many of these actions in the enclosure to this letter. The deconstruction work remains curtailed, with limited approved activities that satisfy the requirements of the SONGS pandemic protocol, particularly regarding the location of those activities and interaction with SONGS critical staff. These activities are in line with federal and state pandemic-related guidelines for critical work. The work to safely transfer spent nuclear fuel from wet to dry storage, which offers additional safety advantages, also continues under the SONGS pandemic protocol. As of today, we have 15 remaining spent fuel canisters to store.

Regarding the partially treated wastewater release, we continue to look into the cause for the large influx of water to the system. While the unplanned release is unacceptable, the systems provided significant dilution, which served to limit any environmental impacts. We have put initial measures in place to prevent reoccurrence.

The team at SONGS has responded to the pandemic challenge in a manner that reflects a focus on safety. We see daily examples of employees focused on protecting not only themselves but their co-workers. I appreciate their efforts and their dedication.

If you have additional questions regarding operations at SONGS, please do not hesitate to contact me.

Sincerely,



Douglas R. Bauder
Vice President Decommissioning and Chief Nuclear Officer, SONGS

cc: Pedro J. Pizarro, President and CEO, EIX

COVID-19 Response

1. What is the full rationale for maintaining the current level of operations during the COVID-19 pandemic?

Southern California Edison's actions at SONGS related to the COVID-19 pandemic have prioritized employee health and safety while conducting operations at the site.

SCE evaluated the work taking place at SONGS following Governor Newsom's March 19 stay-at-home executive order and in light of Department of Homeland Security (DHS) guidance on critical infrastructure sectors, which includes decommissioning nuclear plants, such as SONGS. Governor Newsom further expanded the categories of essential work to include construction work on March 22.

We took actions to curtail some deconstruction work, and paused fuel transfer operations on March 23 to ensure any continuing work would be conducted in adherence to the SONGS pandemic protocol. Non-essential workers, whether SCE employees or contractor staff, are teleworking.

While wet and dry storage are safe for spent nuclear fuel, dry storage in robust, welded stainless-steel canisters provides additional safety advantages. Dry storage systems are passive; they require no electricity, have no moving parts, no make-up water tanks, and cool the fuel through simple convection air flow. The dry fuel storage systems at San Onofre have more than twice the seismic rating of the spent fuel pools.

The decisions regarding continuing work were made in partnership with our co-owners and our lead contractors, who have committed to adhere to the SONGS pandemic protocol.

We at SONGS continue to remain flexible in our response to changing conditions and guidelines.

2. Our communities' first responder services are expected to be overtaxed due to the pandemic. Does SCE's planning account for this reality and what extra steps is SCE taking to reduce the potential need for emergency services at SONGS?

Yes, because of the reduced risk at SONGS as a decommissioning plant, the site is less reliant on off-site emergency responders as compared to when SONGS was an operating nuclear plant. Since retirement of Units 2 and 3 in 2013, with the reactors at SONGS permanently defueled and the spent fuel having cooled for several years, the potential for on site (and off-site) incidents requiring any support from off-site emergency responders has been greatly reduced. In fact, in June 2015, the NRC approved the SONGS Permanently Defueled Emergency Plan which eliminates the requirement for SONGS-specific off-site emergency plans. However, more general "all hazards" emergency plans remain in place with local cities and counties.

At present, Camp Pendleton remains our partner for initial responses to fire, rescue, medical, and medical transport needs. We also have a full-time and a part-time nurse practitioner on site, as well as a robust and well-trained security force. SCE has memorandums of understanding with local health care providers regarding health or medical treatment for employees and contractors. They have assured us they can continue to provide medical care, if necessary.

3. Does SCE have a policy in place to ensure that workers coming from outside the community are healthy and not transmitting COVID-19?

Yes. We have instituted a pandemic protocol to protect all SONGS workers.

Our workforce is relatively stable, though we occasionally have a need to onboard additional personnel depending on the project. We have instituted a travel policy that requires employees and contractors utilizing public transportation, air or ground, to self-quarantine for 14 days before coming on site. We have also instituted travel restrictions for those already on site and those who are currently teleworking.

Employees are urged to self-screen at home, with reminders of COVID-19 symptoms (e.g., fever, dry cough). If they believe they should stay home, they are encouraged to do so.

Employees coming on site self-screen each day before entering. This includes asking themselves a series of questions including how they feel (checking for symptoms); if they've traveled, or a member of their household has traveled (other than local travel); and if they've had close contact with anyone diagnosed with, or suspected to have, COVID-19.

4. What is SCE's plan to ensure staff can wash their hands immediately after use of restrooms, how far are washing stations from on-site restrooms, and how are restrooms being disinfected? Please describe all on-site sanitation measures that are being implemented.

All sanitary facilities at the site remain in operation and are cleaned with disinfectant twice a day. Hand sanitizer is also available for all employees at a number of locations around the plant.

Wastewater Release

1. What caused the sewage treatment plant to fail?

Indications point toward a large volume of wastewater from a blockage in one of the influent lines, and a failure of the influent pump/controller.

2. Was any aspect of the failure related to human error? If so, please provide as much detail as possible.

The large influx of wastewater does not appear to be due to human performance. However, as part of our evaluation we are looking at whether our actions following that event were sufficient to prevent or minimize the discharge, and to what extent human performance was a factor. An early conclusion is that it would be beneficial to revise procedures for operators and staff, in addition to making certain equipment and system upgrades or modifications, to specifically address our response and the overall performance of the plant. Our initial actions prior to re-start of the plant are listed below in response to Question 4.

3. What is the impact of the sewage release on the surrounding environment and how did you reach these conclusions?

The San Diego County Department of Environmental Health assessed the environmental impact as low, requiring no beach closure or action by the public, in part due to the dilution level, which was approximately 200:1 (SCE's NPDES permit for San Onofre calls for a dilution ratio of at least 10:1), and that the release took place more than a mile off-shore and 50 feet below the surface of the ocean.

4. What steps are you taking to ensure further sewage releases will not continue in the future?

To guard against a reoccurrence of a release, SCE has implemented equipment changes and bolstered our response actions.

Before returning the system to service we took the following actions:

- Tested and verified the sewage treatment system equipment is performing properly. We identified an influent pump start switch that was not working properly and it was repaired.
- Established a temporary storage reserve available on site where any future unanticipated volume of influent can be routed.
- Ensured there is 24/7 support available from our licensed sewage treatment operations contractor to respond to off-normal events.