

### SCE Comments on SFPI Staff Report

No.	CCC SFPI Staff Report	SCE Comment
1	<b>Page 1, Summary:</b> "...represents a preliminary step in the decommissioning of SONGS Units 2 and 3..."	To clarify, the proposed project is not a step in the decommissioning process. The purpose of the proposed project is more accurately described as an important interim measure that helps set the stage for decommissioning SONGS Units 2 and 3. In concert with the other Cold & Dark modifications, the SFPI helps achieve a safe operating configuration in preparation for decommissioning.
2	<b>Page 5, Section III, Special Condition 1:</b> "...SCE shall submit, for the Executive Director's review and approval, an Inspection and Maintenance Plan for the SFPI system."	SCE is concerned that the language of this condition implies that any subsequent changes or modifications to the Inspection and Maintenance Plan would also have to be reviewed and approved by the Executive Director before implementation. SCE requests that this condition be revised to state that SCE will notify staff and provide a copy of the revised Plan for the CCC's records if the Plan is significantly modified following its initial submittal to the CCC.
3	<b>Page 5, Section IV.A, Background:</b> "SCE permanently ceased operation of SONGS Units 2 and 3 in June 2013 and has begun the process of plant decommissioning."	To clarify, SCE has not begun the process of plant decommissioning. SCE is in the preparatory stages of decommissioning and will obtain all required permits for the project prior to commencement of major decommissioning activities.
4	<b>Page 5, Section IV.A, Background:</b> "SCE has stated that the proposed Spent Fuel Pool Island (SFPI) cooling system would facilitate plant decommissioning because it is smaller, simpler..."	Same as Comment No. 1.
5	<b>Page 6, Section IV.A, Background:</b> "While no other plant is currently using a system configuration identical to that proposed at SONGS..."	The Rancho Seco and Crystal River nuclear plants have very similar systems/configurations to that of the proposed project.

6	<p><b>Pages 10, Section IV.C, Reduced Seawater Intake:</b>          “At present, the daily intake of ocean water at SONGS is approximately 98 MGD...”</p>	<p>Although SONGS is capable of withdrawing a maximum of 98 MGD under the current pump configuration, SONGS has, in fact, been withdrawing a substantially reduced volume of ocean water.</p>
7	<p><b>Page 10, Section IV.C, Reduced Seawater Intake:</b>          “...results in the mortality of large numbers of marine organisms, both through entrainment in the intake stream and through impingement against the intake screens.”</p>	<p>Since the plant shutdown, entrainment was significantly reduced with a 96-97% reduction in flow rate. In addition, no animals (fish or otherwise) have been impinged. The mortality of large numbers of marine organisms is no longer a concern due to the reduction of flow. SCE requests that this discussion be revised to clarify that there is no impingement currently occurring at SONGS, and the proposed project would result in even further reductions of entrainment.</p>
8	<p><b>Page 10, Section IV.C, Operational Discharges, footnote 2:</b> “...discharges approximately 98 million gallons per day...”</p>	<p>Same as Comment No. 6.</p>
9	<p><b>Page 11, Section IV.C, Reduced Seawater Intake:</b>          “...to approximately 48 MGD.”</p>	<p>Once again, the 48 MGD represents a maximum capability and SONGS would withdraw a lower volume of seawater once the SFPI is implemented, due to the modified pump configuration.</p>
10	<p><b>Page 11, Section IV.C, Reduced Seawater Intake:</b>          “This reduction in ocean water would result in commensurate reductions in entrainment and impingement impacts on marine organisms...”</p>	<p>Same as Comment No. 7.</p>