

## CALIFORNIA COASTAL COMMISSION

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## NOTICE OF COASTAL DEVELOPMENT PERMIT DE MINIMIS WAIVER

**DATE:** February 26, 2015 **PERMIT NO. 9-15-0162-W**

**TO:** Coastal Commissioners and Interested Parties

**SUBJECT:** Waiver of Coastal Development Permit Requirements

Based on the plans and information submitted by the applicant for the development described below, the Executive Director of the Coastal Commission hereby waives the requirements for a coastal development permit (CDP), pursuant to Section 30624.7 of the California Coastal Act.

**Applicant(s):** Southern California Edison Company  
1218 South 5th Ave.  
Monrovia, CA 91016

**Project Background:** Southern California Edison Company (SCE) proposes to install an independent cooling system to serve the existing spent fuel pools at Units 2 and 3 of the San Onofre Nuclear Generating Station (SONGS), near Camp Pendleton, in San Diego County. The cooling system, known as a “spent fuel pool island” (SFPI), would replace the existing once-through-cooling system, which draws seawater from the Pacific Ocean to cool spent nuclear fuel submerged in large pools inside the SONGS spent fuel handling buildings. The proposed project represents a preliminary step in the decommissioning of SONGS Units 2 and 3, and would provide an alternate system for dissipating heat from the spent nuclear fuel while eliminating the plant’s use of ocean cooling water, consistent with the State of California’s Once-Through Cooling Water Policy.<sup>1</sup>

SCE permanently ceased operation of SONGS Units 2 and 3 in June 2013 and has begun the process of plant decommissioning. Prior to initiating formal decommissioning activities, which include the decontamination and dismantling of major structures (e.g., generating units and containment buildings, spent fuel pools and buildings, cooling water intake and discharge conduits, etc.), SCE must undertake several preliminary projects to enable decommissioning to proceed.

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<sup>1</sup> Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling, effective Oct. 1, 2010. [http://www.waterboards.ca.gov/water\\_issues/programs/ocean/cwa316/policy.shtml](http://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/policy.shtml)

The proposed SFPI project would enable the future decommissioning of the Units 2 and 3 seawater intake structures, and provide a stable interim system for spent fuel cooling until the fuel can be transferred to dry cask storage. An independent spent fuel storage installation (ISFSI), approved by the Coastal Commission in 2001 (CDP# E-00-014), exists on the SONGS site. SCE is separately applying for a CDP for a new ISFSI to accommodate all the nuclear fuel currently stored in the spent fuel pools.

**Federal pre-emption:** The Nuclear Regulatory Commission has exclusive jurisdiction over radiological aspects of the proposed project. The state is preempted from imposing upon operators of nuclear facilities any regulatory requirements concerning radiation hazards and nuclear safety. The state may, however, impose requirements related to other issues. The U.S. Supreme Court, in *Pacific Gas and Electric Company v. State Energy Commission*, 461 U.S. 190, 103 S.Ct. 1713 (1983), held that the federal government has preempted the entire field of “radiological safety aspects involved in the construction and operation of a nuclear plant, but that the states retain their traditional responsibility in the field of regulating electrical utilities for determining questions of need, reliability, costs, and other related state concerns.” The facility’s current and proposed possession, handling, storage, and transportation of spent nuclear fuel are therefore precluded from state regulation. The Coastal Commission findings herein address only those state concerns related to conformity to applicable policies of the Coastal Act, and do not evaluate or condition the proposed project with respect to nuclear safety or radiological issues.

**Project Description:** The SFPI cooling system consists of several components that would be installed in and around the existing spent fuel pool buildings within the SONGS protected area:

- Four 200-ton heat capacity chillers (19 ft L x 8 ft W x 8.5 ft H);
- Two shipping containers (20 ft L x 8 ft W x 8.5 ft H) housing four water pumps and piping necessary to circulate water through the spent fuel pools and chillers;
- Approximately 100 feet of pre-fabricated stainless steel piping to connect the spent fuel pools to the chillers (50% to be installed within the existing spent fuel buildings).

The chillers would be secured on reinforced concrete pads, the installation of which may require a minor amount of excavation in order to create a stable foundation. Excavated material would be repurposed onsite or disposed of at an offsite location.

The SFPI cooling system would use recirculated water, drawn from the plant’s demineralized water tank, to transfer heat from the spent fuel pools to the newly-installed chillers, which would dissipate the heat to the atmosphere. This closed-loop system would replace the existing once-through cooling system and eliminate the need for seawater intake and subsequent discharge.

The SFPI system is proposed to be installed beginning on March 20, 2015, and to be placed in service in May 2015.

**Waiver Rationale:** For the following reasons, the proposed project will not have a significant adverse effect, either individually or cumulatively, on coastal resources, nor will it conflict with Chapter 3 policies of the Coastal Act:

- Marine Resources and Water Quality: Installation of the SFPI system would replace the existing once-through cooling system, reducing or eliminating impacts to marine organisms from entrainment and the discharge of used cooling water. The closed-loop SFPI system would also avoid new discharges to the ocean. During construction and possible excavation, site-specific best management practices would be used to control dust and loose soil, and to contain any potential runoff within the working area. All storm drains will be covered to prevent construction runoff and sediment from entering the system.
- Sensitive Habitats and Species: The proposed project would occur entirely within developed areas of the SONGS site, distant from any sensitive habitats or species.
- Visual Resources: The project site is situated at an elevation below that of the public roads inland of SONGS. The proposed structures and equipment would be installed inside or adjacent to larger existing buildings in a heavily industrialized area. Thus, the project would not block views to or along the coast or alter the visual character of the SONGS site.
- Public Access: The SFPI system would be located within the SONGS perimeter. No loss of coastal access would occur.

**Important:** This waiver is not effective unless the project site has been posted and until the waiver has been reported to the Coastal Commission. This waiver is proposed to be reported to the Commission at the meeting of March 11 – 13, 2015, in Chula Vista. If four or more Commissioners object to this waiver, a coastal development permit will be required.

Sincerely,

CHARLES LESTER  
Executive Director

By:



JOSEPH STREET  
Environmental Scientist  
Energy, Ocean Resources & Federal Consistency Division