

*Southern California Edison*  
**SCE-SDGE Joint DCE Application A.14-12-007**

**DATA REQUEST SET A.14-12-007 Gilmore-SCE-005**

**To:** GILMORE

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**Dated:** 06/05/2015

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**Question 48:**

48. For each element of the dry storage system listed in Question 47, please provide the element's lifespan that SCE assumed in calculating the DCE.

**Response to Question 48:**

SCE objects to the request on the ground that it is vague and ambiguous. SCE assumes that this question only seeks information regarding the Holtec system. SCE also objects to the request to the extent it seeks information that is beyond the scope of this proceeding. The scoping memo excludes vendor selection and specifications from the scope of this proceeding. Subject to and without waiving these objections, SCE responds as follows:

Due to the lack of a federal repository for high level waste, no definitive estimate can be provided for the length of time on-site storage will be required. With proper maintenance and monitoring, it is reasonable to conclude that safe storage could continue for 100 years without the use of extraordinary means. The current SONGS 2&3 decommissioning cost estimate includes provisions for maintaining spent fuel at the station through 2049. SCE (and the other responsible participants) will continue to monitor this issue as the DOE moves toward a decision on the final repository for the spent fuel. The DCE includes the maintenance of the facility but not replacement of major components. SCE (and the other responsible participants) will continue to have the responsibility to ensure safe storage of the spent fuel until it is removed from SONGS, and will budget for the continued maintenance of the facility in future years as appropriate.

The NRC has exclusive jurisdiction over the radiological aspects of the Proposed Project. Therefore, consideration of the structural integrity of the proposed technology is outside the scope of this proceeding. In addition, SCE does not believe that consideration of impacts beyond 2049 is reasonable or necessary. Nevertheless, SCE also provides the following for informational purposes:

As stated in the HI-STORM UMAX Final Safety Analysis Report (FSAR), the design life for all components (including the Multi-Purpose Canisters (MPCs), cavity enclosure containers (CECs), closure lids, ISFSI pads, subgrade materials, etc.) of the HI-STORM UMAX system is 60 years. This is accomplished by using materials of construction with a long proven history in the nuclear industry, specifying materials known to withstand their operating environments with

little to no degradation and protecting material from corrosion by using appropriate mitigation measures.

In addition to this 60-year design life, the HI-STORM UMAX system has a comprehensive maintenance program that is implemented to ensure that the service life of the system exceeds the design life. Based on the maintenance program outlined in the FSAR, the HI-STORM UMAX service life is expected to be at least 100 years. An Aging Management Plan (AMP) will also be developed as a condition of license renewal beyond the initial 20-year licensing term. The detailed AMP will follow NRC guidance, including NUREG-1927.