



EDISON ENVIRONMENTAL SERVICES

February 16, 2015

Mr. Sam Coe
Project Manager
Office of Permitting
Department of Toxic Substances Control
8000 Cal Center Drive
Sacramento, California 95826-3200

SUBJECT: Summary and Status of Responses to "FIRST NOTICE OF DEFICIENCY FOR THE RCRA PERMIT RENEWAL APPLICATION, SAN ONOFRE NUCLEAR GENERATING STATION, 5000 PACIFIC COAST HIGHWAY SAN CLEMENTE, CALIFORNIA 92674, EPA ID. NO. CAD000630921

Dear Mr. Coe:

Attached please find the revised subject permit renewal revision with comments addressed. A summary with details regarding how the comments were addressed, and where the revisions/updates may be found, is listed below.

The most recent Cost Closure Estimate (these are updated annually) dated March 20, 2014, is included in this latest revision to the permit renewal.

GENERAL COMMENTS

GC-1: The proposed activity, renewing SONGS current RCRA permit does not affect land or water use. There are no new structures being built, and per the California Coastal Commission has no federal consistency jurisdiction, and therefore could not concur with the certification

GC-2: In Section 4.0, specifically, subsection 4.45, Compliance with Air Emission Controls for containers (CCR section 66270.27), outlines methods utilized to comply with the air emissions standards for containers, not already discussed in other sub-sections of sections 4.0. SONGS does not believe it qualifies for an exemption from this standard.

GC-3: The Environmental Information Form (included with the subject correspondence) is complete and attached to this cover letter. As the form does not lend itself well to anything other than short sentence answers, all answers are attached to the form and directly referenced to each question.

GC-4: The application references the following standard operating procedure (SOP) documents. These have been included with this cover letter as an attachment to the permit renewal application, as requested. It should be noted, that with the cessation of power generation and staff changes, the attached procedures will require revisions. The reviews, revisions and the completion of these



66270.14(b)(18)(E)

February 16, 2015

programmatic changes are being tracked under nuclear notification number 203180610. Copies of these revised SOPs will be forwarded to your department once completed, under the appropriate Class I, II or III permit modification request(s).

SO123-XV-17, Hazardous Waste Management Program

SO123-XV-17.3, Contingency Plan

SO123-XV-18, Mixed Waste Guidelines

SO123-IX-2.202, Hazardous/Mixed Waste/Material Shipments

SO123-IX-2.206, Hazardous Material/Waste/Mixed Waste Inspections

SO123-IX-2.208, Hazardous Waste and Emergency Response Training Program

SO123IX-2.210, Hazardous Materials Emergency Response Protocol

GC-5: The Disclosure Statement forwarded to SONGS in August 2014 is being completed as an exemption and will be forwarded under separate cover letter prior to March 19, 2015.

SPECIFIC COMMENTS

Comments on Attachment 1-3 - Part A Permit Application

1.1: Page 3 of the Hazardous Waste Permit Information Form is complete and included in the revision to the permit renewal, attached in section 1.3.

1.2: Page 5 of the Hazardous Waste Permit Information Form has been updated to include all the waste codes in the RCRA Subtitle C Site Identification Form.

1.3: The Topographic Map was replaced with a larger version to ensure the legend and contours are legible. The full size version of this map is too large to print on equipment available at SONGS, but along with the printed hardcopy attached, an electronic version will be sent to you and permits full viewing of all the details on the digital scan of this larger map.

Comments on Section 2 – Facility Description

2.0: Attachment 2-3 Topographic Map has been updated to include a Wind Rose (66270.14(b)(18)(E)) showing the prevailing wind direction and average wind speed in that sector.

2.1: The distances to the closest military housing and residential communities has been updated in the General Description section. The structures on the base across I-5 are not residential structures. The sites annual Land Use Census performed by SONGS personnel in the fall of 2014, was used as the source of the updated information.

Comments on Section 3 – Waste Characteristics

February 16, 2015

Comments on Section 5 – Procedures to prevent Hazards

5.0: The requirements of CCR Title 22 section 66264.37 require that attempts be made to make arrangements, as appropriate, to utilize State emergency response personnel, contractor personnel, local fire department and police, and to familiarize local hospitals with the types of hazardous wastes handled at the facility. The property SONGS was constructed and operated on is an easement from the Department of the Navy, and arrangements for emergency response services with United States Marine Corps. Camp Pendleton Fire Department (CPFD) have been negotiated. This includes, but is not limited to fire, hazardous materials/waste and medical emergencies. A copy of the Memorandum of Understanding is attached in the permit renewal application. CPFD from multiple stations, as well as Orange County Fire Authority personnel have been familiarized with the Site and hazardous materials and storage areas. At a minimum, an annual training with CPFD is performed with SONGS Emergency Response personnel/fire brigade members to maximize their familiarization with personnel, facilities on site and coordination of efforts in an emergency.

5.1: Section 5.3, page 5-1 has been edited to specify that any containers found to be inadequate or damaged will have their contents transferred to an appropriate container, or the damaged container placed in an over pack, "immediately upon discovery".

5.2: Section 5.7.2, Page 5-7 makes reference to efforts made to ensure compliance with the uniform Fire Code. Both the HazMat Pad and MPHF fire suppression systems were designed and built under a Design Change Package (DCP) in accordance with the at-the-time-current Fire and Building Codes. Both structures have sprinkler systems, local alarms, as well as Alarm Company monitoring and assessment (24 hrs/7days a week). Both facilities also have a normal compliment of fire extinguishers that are inspected monthly and serviced per the applicable NFPA standards. If flammable containers were stored in the MPHF, the utilization of flammable cabinets are added for additional protection.

Comments on Section 6 – Contingency Plan

6.0: The Contingency plan has been included in section 6 of the part B application. It is currently under review and will be updated, at a minimum to reflect the Memorandum of Understanding with the USMC CPFD.

Comments on Section 8 – Closure Plan.

8.0: An addendum was added to the Closure Plan, to reflect that 20 samples will be selected for sampling randomly, and they will be taken to a depth of 5 feet below the surface, unless contaminants are discovered, in which case, sampling will continue to a depth of 24 feet if necessary. There are no recorded or known spills that have occurred during the period these facilities have been in use at SONGS. The Multi Agency Survey and Site Investigation Manual (MARSSIM) protocols will be used to



February 16, 2015

select the sample locations randomly. Lower Elevation sumps will be selectively sampled (Biased Sampling) as these are the more likely locations to expect contaminant, though no events leading to the selection of these locations, have occurred.

8.1: Also reflected in the Addendum; All chemical sampling criteria will be non-detect. All radiological sampling criteria will be non-detect above background whether in soil, building material and surrounding areas.

8.2: Also reflected in the Addendum; and in Attachment 8-1, on the front page and in section XVI the expected closure year will be updated to 2040 during the next annual update.

8.3: Also reflected in the Addendum is a list of minimum analyses for site characterization work. In Attachment 8-1, Table 1, the list of common wastes, codes and properties is listed. The site characterization work and analyses that is currently undergoing and during closure of the facilities would be similar to a Phase I and II approach. Sample matrix that would be expected would be similar to the Addendum. The specific test methods would be PCBs (8082), TPH (8015), VOCs (8260B), TCLP/TTLIC/STLC Metals (EPA1311/Title 22) and pH (9045C). Associated costs will be reflected in the annual Closure Cost Estimates and Financial Assurance updates.

Comments on Section 10 – SWMU’s

10.0: Section 10 –The list of SWMU’s at the facility has been updated, and their location on the topographical map has been updated as well in section 10 of this permit renewal application.

10.1: All information required for SWMU’s under CCR Title 22 section 66270.14 has been updated for each SWMU in Attachment 10-1.

If you have any questions, please contact Brian Metz, Environmental Manager, SONGS at (949) 368-7311 or Brian.Metz@SCE.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Metz", is written over the typed name and title.

Brian D. Metz
Environmental Manager
SONGS