

October 20, 2011

VIA E-MAIL & U.S. MAIL

Jonathan Bishop
Chief Deputy Director
State Water Resources Control Board
1001 I Street
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RE: Southern California Edison Company's (SCE) Comments to October 1, 2011 Scope of Work Report by the Review Committee for Nuclear Fueled Power Plants

Dear Mr. Bishop,

This letter contains SCE's comments on the revised scope as shown in the Scope of Work Report (Report), dated October 1, 2011. SCE respectfully requests that you take these comments into consideration in finalizing the Report. SCE's comments relate to: (1) the independent third party's (i.e. consultant) standard of review; (2) potentially ambiguous criteria; and (3) participation by the regulated entities.

Consultant's Feasibility Determination

SCE is pleased to see that the consultant criteria list, jointly developed by SCE and Pacific Gas and Electric (PG&E), was included in its entirety. Considerable effort and collaboration went into developing this portion of the draft scope. However, as detailed below, SCE is concerned that certain criteria do not establish a standard that is sufficiently rigorous to ensure that determinations regarding feasibility are accurate and conclusive. More specifically, SCE's concerns relate to the following language in the Report:

- Page 7, Criterion No. 3, **Operability General Site Conditions**.
SCE is concerned that Criterion No. 3 only requires the consultant to apply a standard of "acceptable/feasible" in determining whether a proposed technology is operable in site specific environmental conditions. SCE believes this level of review is insufficient and the criterion should require a more stringent standard for feasibility. Therefore, SCE suggests a minor revision of Criterion No. 3 as follows (revisions indicated in italics):
Assess operability and operational issues that are specific to the study sites. *Thoroughly and convincingly demonstrate* that the proposed technology change is acceptable/feasible to operate in site specific environmental conditions. Assessment should consider such issues as existing cooling source water conditions including currents, temperature ranges, occurrence of detrimental ocean storm/high-swell conditions, range of water column debris loading conditions, and marine biofouling concerns.

In general, a less rigorous standard would result in a final work product that only leads to ambiguity and further questions. It is in the best interest of the Board and the regulated entities to ensure that the Special Studies provide conclusive information, especially in light of the OTC Policy's compliance schedule. Therefore, the consultant should be required to provide supportable definitive conclusions regarding design, construction, operational and permitting feasibility, as determined by a professional engineer, in the final report.

Potentially Ambiguous Criteria

Once again, SCE is pleased to see that the criteria checklist in large part adopts the draft scope jointly developed by SCE and PG&E. However, as detailed below, SCE is concerned that certain revisions to the criteria checklist may result in ambiguity. More specifically, SCE's concerns relate to the following language in the Report:

- Page 7, Criterion No. 6, **Seismic Issues.**
SCE is concerned that Criterion No. 6 is unclear regarding whether the consultant should consider potential changes to standards in the assessment. SCE believes the intent of this criterion was to require the consultant to consider only the current standards but to note that this analysis may be affected by changes to the standards in 2015. Therefore, SCE suggests a revision of Criterion No. 6 as follows (revisions indicated in italics and strikethrough): Assess cost and engineering constraints of constructing and operating each technology being considered in a seismically active zone. This shall be done considering current design standards *only*. *The independent third party should note that these standards may potentially change* ~~as well as addressing that these standards may reasonably be expected to change~~ depending on studies to be completed in 2015, at which point the assessment of seismic issues may need to be reconsidered. Specific seismic upgrades or requirements may be needed for each technology being considered (i.e. could natural draft cooling towers effectively be installed when considering the seismic characteristics of the plant site) based upon on the results of the studies completed in 2015. To the extent possible, the independent third party shall attempt to estimate the cost and engineering constraints of future ground motions, which the studies could determine to be higher or lower.
- Page 7, Criterion No. 7, **Structural.**
SCE is concerned that Criterion No. 7 could be subject to misinterpretation. The revised criterion incorporates a cost component that was not intended to be addressed as part of the structural assessment. Rather, this criterion should evaluate loading conditions, and cost is more appropriately addressed as a separate issue, including under Criterion No. 11. Therefore, SCE suggests revising the criterion in its entirety to read as follows: Identify the critical loading conditions and reasonably ensure that the impacts of adding new structures to existing structures can be accommodated during a detailed design phase of the technology.

Minimizing the potential for misinterpretation of criteria will be invaluable in ensuring an accurate assessment of the potential technologies. Therefore, SCE recommends that Board staff revise the criteria as suggested above.

Participation By Regulated Entities

The Report does not address participation by SCE and PG&E in the review and comment process for finalizing of the Special Studies. Because the Special Studies involve assessments and determinations that are highly technical and site-specific in nature, it is imperative that the regulated entities be provided with opportunities to give their input to the consultant. This will ensure that the Special Studies are entirely accurate, contain all pertinent information, and provide a meaningful basis for decision-making. While the consultant will be selected on the basis of its relevant experience, peer review by the regulated entities will ensure completeness and accuracy of the final work product. Therefore, SCE recommends that Section 5.0 of the Report include provisions regarding participation by SCE and PG&E. At a minimum, the regulated entities should have an opportunity to review and comment on an administrative draft of the Special Studies before a final work product is issued.

Thank you for your consideration of SCE's comments. Should you have any questions regarding the information in this letter, please do not hesitate to contact me at (626) 302-9456, or David Asti at (626) 302-9732.

Very truly yours,
Michael M. Hertel, Ph.D.



Director, Corporate Environmental Policy

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