



**ALLIANCE FOR NUCLEAR RESPONSIBILITY**

PO Box 1328  
San Luis Obispo, CA 93406  
(858) 337-2703  
(805) 704-1810  
[www.a4nr.org](http://www.a4nr.org)

July 19, 2011

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 11-IEP-1J  
1516 Ninth Street  
Sacramento, CA 95814

**RE: Comments and Recommendations of the Alliance for Nuclear Responsibility (A4NR) in response to the Nuclear Data Requests of Southern California Edison (SCE) in the 2011 Integrated Energy Policy Report, Docket 11-IEP-1J**

The following comments are drawn from the questions asked of the utility by the CEC and include below the question, the answer provided by the utility, and additional questions and or recommendations regarding the utility's answer posed by A4NR.

**Question A.01:**

Please report on the overall plans, schedule and progress for completing the recommendations in the AB 1632 Report/2008 IEPR Report (pp. 78-81), the 2009 IEPR (pp. 238-240), and the California Public Utilities Commission's (CPUC) letters of June 2009 to PG&E and SCE; please indicate when PG&E and SCE plan to report to the Energy Commission and the CPUC on the findings from these studies. How do the schedule and plans for completing these recommendations compare to the schedule and plans for license renewal? (Diablo Canyon, SONGS)

**Response to Question A.01:** SCE indicated in this report that further evaluation of the offshore discharge conduits (pipes) is required to assess the conduit's seismic capacity for non-safety related reliability purposes. SCE anticipates that the results of this evaluation will be submitted to the CPUC and CEC by early July, 2011.

**A4NR: We are now at the end of July 2011. Has the evaluation of offshore discharge conduits as mentioned in A.01 been provided by "early July, 2011?"**

**Response to Question A.01 (cont.):** SCE continues to assess options for the timing of CPUC and NRC license renewal filings.

**A4NR: What does SCE imply by continuing to assess options for the “timing of CPUC and NRC license renewal filings?” Does SCE intend to do as PG&E did and file for NRC license renewal prior to completion and independent state peer-review off the AB 1623 seismic studies? Will SCE commit to not filing with NRC until the completion and review of the studies? At the CPUC hearing for the relicensing funding for Diablo Canyon, for which the current alternatives are “dismissal” or “suspension,” the following statement was made on July 7, 2011, by Walker Matthews, attorney for Southern California Edison, and is here quoted from the official transcript:**

My name is Walker Matthews, attorney for Southern California Edison. I would like to join in San Diego's statement. I also would like to say for the record based on some of the comments that have been made in this hearing that this proceeding should be limited solely to the consideration of PG&E's funding request. SCE and SDG&E have not filed an application for funding for SONGS license renewal, and that issue is not before the Commission in this proceeding. Therefore, the Commission's decisions in PG&E's license renewal funding proceeding, particularly as it relates to the timing and sequencing of PG&E's activities, should not have precedential effect in a future SONGS license renewal funding proceeding.

**A4NR: Is the response of SCE in this above referenced PG&E CPUC proceeding an indication that SCE may intend to follow PG&E's actions and file for NRC license renewal before meeting the state's requirements to complete the advanced seismic and other studies recommended in AB 1632? Has the CEC any reason to now believe that SCE will not fulfill its commitment to AB 1632, in spite of the following comments made by CEC Vice Chairman James Boyd to SCE representative Alvarez at the IEPR adoption hearing on December 16, 2009:**

VICE CHAIR BOYD: And I think, Mr. Alvarez, I will give you another message to carry back. I did not complement you and Edison vis a vis PG&E on the cooperation on nuclear; I am very disappointed, and I said so in the Press, with what PG&E has done, and I think now it is time to single out Edison for their statement of wanting to collaborate and cooperate on all of the commitments and another utility has chosen, as Ms. Becker has indicated, to kind of go around behind us. I cannot speak for Commissioner Byron, but I for one know that there was great disappointment with that action. But we will address it in due time.

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**Question A.03:** Please discuss the relevance of these models and the revised UCERF database for the studies that might be required as part of the license renewal feasibility assessments for the plant. (Diablo Canyon, SONGS)

**Response to Question A.03:** While the referenced studies may provide additional information for regulators and the public, they are not required to support NRC license renewal at SONGS.

**A4NR: Does SCE intend to ignore the relevance of these studies because they are not required to support NRC license renewal? How can SCE guarantee that data or models from UCERF might not be required to execute the mandatory federal equivalency permit that needs to be granted by the California Coastal Commission, during NRC license renewal, or, by the NRC itself in light of lessons learned from Fukushima?**

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**Question A.05:** Please report on progress in efforts to prioritize and include further investigations into the seismic setting at SONGS and assess whether recent or current seismic, geologic or ground motion research in the vicinity of SONGS has implications for the long-term seismic vulnerability of the plant. (SONGS)

**A.05:** SCE's seismic program will enable it to respond to the NRC's Generic Letter. The Nuclear Regulatory Commission (NRC) is developing a Generic Letter to request information from all U.S. nuclear plants regarding seismic hazards.

**A4NR: Once again, does SCE intend to direct all its efforts to only address requirements in support of NRC license renewal? How can SCE guarantee that data or models from UCERF might not be required to carry out the required federal equivalency permit that needs to be granted by the California Coastal Commission, and which the NRC must adhere abide by? Are there not requirements for studies in AB 1632 that go beyond those required by the NRC?**

**In light of the NRC's task force report on Fukushima, and the NRC's ASLB order creating a 52 month delay in the PG&E relicensing for seismic studies, does SCE believe this will not portend a precedent for San Onofre?**

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**Question A.07:** Please report on the status of and findings from PG&E's and SCE's assessments regarding to what extent their plants' non-safety related systems, structures and components (SSCs) comply with current building codes and seismic design standards for non-nuclear power plants. (Diablo Canyon, SONGS)

**Response to Question A.07:** On February 2, 2011, Southern California Edison (SCE) submitted its response to the California Public Utilities Commission's (CPUC) direction to address certain topics regarding the San Onofre Nuclear Generating Station Unit Nos 2 & 3 and as recommended by the California Energy Commission's (CEC) 2008 AB 1632 report,

**A4NR: SCE submitted its responses to the SSC question on February 2, 2011, a month before Fukushima disaster in Japan. Does SCE intend to update and revise those findings in the aftermath of Fukushima, and if so, when? And at what cost?**

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**A4NR: The following questions and responses relate to spent fuel pools; related questions from multiple (but related) sections of the data requests are combined.**

**Question A.10:** The National Academies in 2006 reported on the risk of fire from overheated spent fuel rods in spent fuel pools. Fires were reported in the spent fuel pools at the Fukushima Daiichi plant. Please report on the progress in returning the spent fuel pools to open racking arrangements, as recommended in the 2008 IEPR,

**Response to Question A.10:** SCE is currently evaluating whether the rate at which used fuel is moved from the used fuel pools into dry cask storage should be modified. The original storage capacity for SONGS 2 & 3 was 1,600 used fuel assemblies. Re-racking is not required to store only 1,600 used fuel assemblies in the existing racks. Replacement of existing used fuel racks would result in unnecessary production of low level radioactive waste and additional unnecessary cost.

**Question D.03:** How many times has the spent fuel pool been re-racked? What are the plans for storing spent fuel in pools through the end of the operating license and through a 20-year license extension? (Diablo Canyon, SONGS)

**Response to Question D.03:**

The used fuel pools at SONGS Units 2 & 3 *have been re-racked once*. On February 2, 2011, Southern California Edison (SCE) submitted its response to the California Public Utilities Commission's (CPUC) direction to address certain topics regarding the San Onofre Nuclear Generating Station Unit Nos 2 & 3 and as recommended by the California Energy Commission's (CEC) 2008 report.

**Response to Question D.02:** There are currently 2,450 used fuel assemblies stored in the SONGS 2 & 3 used fuel pools, which have a combined capacity of 3,084 assemblies (including 434 cells that are held available at all times for full-core offload reserve requirements). *The SONGS 2 & 3 used fuel pools had an original storage capacity of 1,600 assemblies before re-racking.*

**Question D.04:** What is the estimated time/costs to return the spent fuel pools to their original storage configuration (as originally designed), for example, by moving some spent fuel from the pools into dry cask storage (Diablo Canyon, SONGS)

**Response to Question D.04:**

SCE has no estimate of time/costs to return the used fuel pools to their original storage configuration. SCE is currently evaluating whether to modify the rate at which used fuel is moved from the used fuel pools into dry cask storage. The original storage capacity for SONGS 2 & 3 was 1600 used fuel assemblies. Re-racking is not required to store only 1600 used fuel assemblies in the existing racks.

From :

**Question A.12:** Please provide information on the plans and estimated costs for storing and/or disposing of low-level nuclear waste and spent nuclear fuel that would be generated through a 20-year license extension and plant decommissioning. (Diablo Canyon, SONGS)

#### 4. Used Fuel Storage Systems

##### a) Used Fuel Pool

The NRC has approved the use of engineered pools to store used fuel. These pools provide cooling, prevent criticality, and protect the fuel assemblies from excess mechanical or thermal loading. Used fuel is stored underwater in the pools in storage racks. Used fuel assemblies are maintained in a safe configuration by several design aspects of the used fuel storage racks including: (1) the pattern of the fuel assemblies in the racks, and (2) the design of the racks which limit fuel assembly interaction. Design of the used fuel pools ensures adequate convective cooling for the removal of decay heat. The used fuel pools are located in a secured area at SONGS 2 & 3, with one pool for each unit. Cooling and system integrity monitoring and maintenance are performed as part of routine operation and maintenance programs.

From:

#### 2. Used Fuel Management Plan

SCE plans to safely store its used fuel onsite in the ISFSI and in its used fuel storage pools, as necessary, until the DOE fulfills its contractual obligations to remove the used fuel from the site. The technology exists to evaluate, refurbish, and repair or replace used fuel dry cask storage system components, for as long as it is necessary to extend the life of the used fuel dry cask storage facility

**A4NR: There seems to be confusion over the long-term waste storage plans for SONGS, that raise the following questions:**

- 1. SCE states in answer D.04 that they have no cost or schedule to return the fuel pools to their original lower-density capacity. Does SCE intend to consider or actually intend to reduce the density of the spent fuel pools at SONGS to their pre-re-racking configuration as recommended in the 2008 report? If not, why?**
- 2. If, as answered in A.10, “. Re-racking is not required to store only 1,600 used fuel assemblies in the existing racks” then why wouldn’t SCE perform the operations necessary to return the pools to their original capacity of 1600 used fuel assemblies (For SONGS 2+3)?**
- 3. SCE maintains that it will have room in the ISFSI facility to store all spent fuel assemblies from the initial 40 year license and a 20 year license renewal. Does SCE commit to doing that or do they leave open the possibility that spent fuel from the relicensing period may remain in the spent fuel pools for an indeterminate time?**

**Finally, and in general, how is it that PG&E is able to provide the amount in metric tons of spent fuel quantities at Diablo Canyon, but SCE maintains that such data must remain confidential due to national security conditions?**

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**Question A.13:** Please describe any studies underway or to be completed for (sic.) as part of license renewal feasibility studies that: (a) quantify the local economic impacts of shutting down the plants compared with alternate uses of the site and (b) assess the reliability, economic and environmental impacts of replacement power options for the plants. Please provide copies of any assessments conducted since 2008. (Diablo Canyon, SONGS)

**Response to Question A.13** (excerpt of answer) Specifically, the operation of SONGS 2 & 3 affects a large number of sectors within the California economy. The study indicates that the operation of SONGS 2 & 3 supports about 9,400 jobs and impacts the California economy by more than \$3.3 billion per year.

**A4NR: If SCE concludes that the economic value of SONGS to the California economy in terms of jobs and related spending is \$3.3 billion per year, does SCE also conclude that the loss of SONGS as an energy generating facility due to possible seismically related event such as the one experienced at Kashiwazaki (without environmental releases) or Fukushima (with environmental releases) also poses a \$3.3 billion liability for California?**

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**Question B.06:** Please provide a copy of any cost/benefit study on the costs and risks of long-term or indefinite onsite spent fuel storage in pools and dry cask storage.

**Response to Question B.06:** SCE has not estimated the costs for relying indefinitely upon onsite storage facilities. See the response to D.13 for used fuel storage costs at the ISFSI. No cost/benefit study on the costs and risks of long-term or indefinite onsite used fuel storage exists. In the absence of Yucca Mountain or any other off-site used fuel repository, a cost/benefit study can not be done.

**A4NR: Why and how is “...the absence of Yucca Mountain or any other off-site used fuel storage...” repository an impediment to SCE doing a cost/benefit/risk study of the indefinite storage of spent fuel on site (in pools or dry casks)? Indeed, the fact that such a storage facility has been promised and undelivered by the federal government for 30 years is the very reason to consider its present and ongoing absence an economic and liability risk that must be factored into the ongoing production of radioactive waste via nuclear power generation. The fact that no current study exists is not a detriment, it is the impetus for SCE to design and implement such a study as they had been tasked to do as part of the overall scope of the AB 1632 requirements.**

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**Question D.05:** What are the annual spent fuel pool operating and maintenance costs? Are any major capital investment projects planned and/or anticipated for the spent fuel pools, particularly in light of events at the Fukushima Daiichi plant? If so, what are the anticipated costs? (Diablo Canyon, SONGS)

**Response to Question D.05:** SCE's accounting system does not separately identify operations and maintenance (O&M) costs for the SONGS 2 & 3 used fuel pools. These costs are embedded in the annual SONGS 2 & 3 Base O&M expenses.

**A4NR:** Simply because SCE's "accounting system does not separately identify" the costs for operations and maintenance of the SONGS spent fuel pools does not mean that the data cannot be derived. Ongoing costs for these pools, absent a long term waste storage solution (as SCE admits in their answer to B.06) are needed by the state to determine future undetermined costs of radioactive wastes storage. The ultimate costs—including the possibility that the federal government arrives at no national solution during the 60 year period of the NRC's "waste confidence" decision, or that the utility itself becomes insolvent (the situation facing TEPCO in Japan)—could leave the long term waste storage as an unfunded mandate passed on to the state of California.

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**Question D.06:** What is the current status of the Interim Spent Fuel Storage Installation (ISFSI) and projected schedule for transfer of spent fuel to the ISFSI during the operating license period and through a 20-year license extension? What are the current estimated costs for constructing new dry cask storage facilities onsite? (Diablo Canyon, SONGS)

**A4NR:** According to the tables provided by SCE to answer question D.06, if a 20 year license renewal is granted to SCE for SONGS 2+3, spent fuel will remain in the spent fuel pools until the year 2054, when the last assembly is removed. What mechanisms does SCE have in place to insure that adequate funding for any institutional, managerial and administrative policies that will needed to monitor this "active" cooling method, more than 12 years after all revenue and income from the facility has ceased?

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**Question D.11:** What are the most recent estimates for how long spent fuel can be safely stored in the ISFSIs without repackaging or refurbishing any ISFSI components? For ISFSI components with design lives of less than 50 years, please specify the design life for each component and describe: (a) what steps would be needed in order to continue to store spent fuel in the ISFSI beyond that design life, (b) the cost of these steps, and (c) the new design life of the component after these steps are taken.

**Response to Question D.11:** The design life for ISFSI components is 100 years for the storage modules and 55 years for the dry storage canisters. Before the design life of the components is reached, a review of the material condition (i.e., inspection of the components for physical degradation) will be conducted to assess how much life remains with adequate safety margins, and what actions are required, if any. The cost will depend upon what actions are needed as determined from the inspection and assessment of the materials.

**A4NR: Is SCE willing to concede that the future potential costs from any failures of the ISFSI or dry storage canisters and components is “unknown” and/or “unknowable” at this time? If not, SCE should provide these cost estimates.**

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**Question D.13:** What are the current annual and total estimated costs for the maintenance, operation, and security for the ISFSI? What are the estimated costs for storing spent fuel in the ISFSIs through the end of the plant’s current operating licenses? What would be the additional operations, maintenance, and security costs resulting from delays in shipment to offsite storage lasting up to 25 years (for example, through the year 2034)? (Diablo Canyon, SONGS, Humboldt Bay)

**Response to Question D.13:**

SCE's budgeting system does not separately identify operating and maintenance (O&M) costs for the SONGS ISFSI. These costs are embedded in the annual SONGS 2 & 3 Base O&M expenses. SCE has not developed an estimate of such costs resulting from delays in shipment to offsite storage through the end of the current operating license or through a period of extended operation.

**A4NR: The potential costs to California ratepayers for the unfunded mandate of long term high level waste storage is a great liability. SCE should be made to provide an itemized budget of the ongoing costs and maintenance of the ISFSI. The federal government is now 30 years behind in its promise to deliver a permanent solution to radioactive waste disposal; the CPCN granted to the California nuclear facilities never included nor assumed a long term waste repository on site. That the state or ratepayers may or will be required to assume the burden of paying for this storage cannot be dismissed and any prudent and reasonable discussion of the costs/benefits and risks of ongoing nuclear power generation in California deserves specific answers to these questions.**

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**Question E.03:** Recent high resolution seismic reflection data relevant to SONGS was collected by the USGS (spring 2008) that revealed a previously unknown but apparently active fault zone between the San Diego Trough fault zone (SDTFZ) and the San Pedro Basin fault (SPBF). The interpretation of this data is that the new fault connects the SDTFZ and the SPBF, forming a combined fault zone about 250 km in length and that the new combined fault zone may pose more significant seismic hazard than previously recognized. Has SCE assessed whether this research has implications for the long-term seismic/tsunami vulnerability of both safety-related and non safety-related systems and components of SONGS? If so, what are the results of the assessment? (SONGS)

**Response to Question E.03:** These faults were included as fault sources in the SCE (1995, 2001) Probabilistic Seismic Hazards Analysis (PSHA) for SONGS, and the results of these studies showed that neither of the faults contribute significantly to the hazard at SONGS; thus these faults were not included in the SONGS 2010 PSHA.

**A4NR: SCE's answer to E.03 appears to skirt the question posed by the CEC. The CEC question refers to data collected in spring 2008. In their answer, SCE cites data from 1995 and 2001 that were used in their PSHA for SONGS and because of a negative result from that older data, did not include information regarding this faulting in the 2010 PSHA. SCE does not answer the question, which asked about the inclusion and analysis using the 2008 USGS data. When and how is SCE using (or not using) this 2008 USGS data, and if not, why?**

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**Question E.06:** Significant global warming issues for coastal nuclear power plants include sea level rise and increased storm activity. Please describe any studies planned, underway or completed regarding global warming phenomena and their effects on the plant. (Diablo Canyon, SONGS, Humboldt Bay)

**Response to Question E.06:**

No studies on the effects of global climate change on SONGS are planned, underway, or completed.

**A4NR: Please explain why SCE is ignoring either the issues raised by the CEC in their question, or please provide reports, data and analysis that can confirm that SCE has no reason to be concerned with the aforementioned phenomena. Clearly, while not a coastal issue, the unusual spring rains and snow melt that fed the flooding of the Missouri River and caused the indefinite shutdown of the Ft. Calhoun reactor and came within inches of threatening the Calloway reactor demonstrated instances where theoretical occurrences such as the proverbial "100 year flood" can and do happen. Why does SCE choose to ignore these events and other potential impacts?**

**In addition, how is it that PG&E is able to come to the following conclusion in its Data Response answer to the same question:**

By extending DCP operations until 2045, DCP could be subject to this projected 16-inches sea level rise. PG&E has completed evaluations of plant structures that may be impacted by sea level rise. These structures include the intake structure, breakwaters, and discharge structure. PG&E concluded that if sea level rises an additional 16 inches, the design of the plant structures would not be affected (Reference 3).

**And yet SCE assumes these changes won't affect SONGS? Is SCE or the CEC aware of the most recent USGS study on eroding shorelines in southern California, Published in The American Geophysical Union's "Geophysical Research Letters, P. L. Barnard, J. Allan, J. E. Hansen, G. M. Kaminsky, P. Ruggiero, and A. Doria (2011), The impact of the 2009–10 El Niño Modoki on U.S. West Coast beaches, Geophys. Res. Lett., 38, L13604, doi:10.1029/2011GL047707.)**

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**Question F.01 through Question F.04:** These questions from the CEC ask SCE to “provide any studies or reports that describe the characteristics of the resources that might be needed to replace the plant in the 2020s” as well as “What new generation and/or transmission facilities would be needed to maintain voltage support and system and local reliability in the event of a long-term outage at Diablo Canyon or SONGS? Please describe the contingency plans to maintain reliability and grid stability in the event of an extended shutdown at the plant,” and “Please describe plans for replacing power from the plant if an outage lasts longer than 90 days. What are the contingency plans for replacement power if a prolonged outage lasts one year or more?”

**Response to Question F. 02 through F.04**

Electric system reliability in southern California would be imperiled by an unplanned long-term outage at SONGS 2 & 3, especially in the SCE and SDG&E service territories. SONGS 2 & 3 provide energy for customers and significant support to keep the grid operable and compliant with state and federal performance standards. Without this support, the electric grid becomes especially vulnerable to failures and preserving the integrity of the electric grid would likely require implementing controlled rolling blackouts.

In the event of a long-term outage at SONGS 2 & 3, it is likely that controlled rolling blackouts would be implemented, in the short-term, to reduce the stress on the electric grid by disconnecting customers until the risk of electric grid failure is gone. The implementation of this contingency plan would likely occur under moderate to heavy load conditions, and would continue to occur intermittently. The significant investment required for new transmission and generation, and the associated lead times, are not conducive for use as a contingency plan.

**A4NR: In 3 out of 4 answers, SCE paints, with the above language, the unavailability of SONGS as having a catastrophic affect on power grid energy generation, reliability and cost in southern California. While this is no doubt intended to show just how valuable the SONGS facility is to the southern California grid, it has the equal effect of demonstrating just how vulnerable such a single large baseload source of generation is to the unintended and unplanned external forces of nature or deliberate acts of malice. In the wake of Fukushima, for the state of California to ignore even studying the potential loss of such a large source of generation, and to allow the utility to operate without an immediate contingency plan (or, at the very least, “studies” to be used in planning) for replacement generation would be irresponsible and imprudent.**

**In addition, the following exchange took place on April 14, 2011 at a state senate hearing on the future of nuclear power in California, between Senator Padilla, Chairman of the Energy, Utilities and Commerce Committee, and Mr. Stern of SCE:**

PADILLA 01:47:55

The last way of asking the question is kind of a yes-no. Are you required to have these emergency plans in place to substitute for the loss of power.

STERN 01:48:10

The requirements that we have, involve what Ms. Kellon (?) described as the “Resource Adequacy Review” requirements, which the state has on an overall basis. So we have enough capacity in the state, in the system, and in the local areas to handle expected forced outages, changes in weather conditions, etcetera. That process is not really designed to look at the long-term loss of large elements of generation or transmission, it’s really designed to look at what you might normally expect over the course of a year in terms of unavailability of power when you might otherwise want it.

PADILLA 01:48:52

So, the worst-case scenario that you’re asked to prepare for really isn’t the true worst-case scenario is what I’m hearing?

STERN 01:49:00

I think that’s a fair assessment. I think the idea is that that the unlikelihood of such an event makes it such that to spend the potentially billions of dollars against that low probability event doesn’t appear to be warranted. It’s like, you want to be able to have your car to work every day—sometimes your car might not operate—that’s doesn’t mean you should have a spare car sitting there just in case. At the same time, you know, sometimes your car is not going to operate.

PADILLA:

It’s a risk benefit analysis.

STERN:

That’s right.

**SCE poses in its answers to F.02-F.04 that the risk is grave for the region to lose power from SONGS. Senator Padilla was concerned with the ability of the utilities to provide power in the event of a Fukushima-like event for which outages lasted extended periods of time. Mr. Stern indicates that SCE follows the state’s Resource Adequacy Review, stating: “That process is not really designed to look at the long-term loss of large elements of generation or transmission, it’s really designed to look at what you might normally expect over the course of a year in terms of unavailability of power when you might otherwise want it.” In response, Senator Padilla asks if that is truly “worst-case scenario” planning, and Mr. Stern agrees that it isn’t. Should the CEC and the ISO be mandating a planning process for the utilities *that actually plans for the possibility* of extended losses of large baseload power supplies such as happened at Fukushima?**

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**Question G.01:** Please provide current information summarizing the insurance policies concerning nuclear liability claims for the facilities including what is the current maximum liability for secondary financial protection for your facility.

**Response to Question G.01:**

Federal law limits public liability claims from a nuclear incident to approximately \$12.6 billion. SCE and other owners of San Onofre Nuclear Generating Station (SONGS) have purchased the maximum private primary insurance available (\$375 million), provided by American Nuclear Insurers (ANI) in the "Facility Form."

**A4NR: Given that initial liability claims for property damage resulting from the meltdowns at Fukushima are reported by Forbes, Fortune and other financial sources to have exceeded \$23.6 billion by June, 2011, which is almost double the Price-Anderson limit of \$12.6 billion, and private insurance only covers SCE up to \$375 million, how would SCE plan to make “financially whole” any claimants within the state of California were a disaster of the magnitude of Fukushima to strike the SONGS facility? Given that the damage in Japan struck at a remote area of the nation that was much less densely populated than the region surrounding SONGS, has SCE done a calculation and estimate of the potential property damage claims that might arise from a similar scenario? Has SCE run any estimates or scenarios of various costs in liability claims for incidents of both greater and lesser magnitude than the Fukushima events?**

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**Question H.02:** What are some of the major advantages and disadvantages for establishing a San Onofre Independent Safety Committee similar to the Diablo Canyon Independent Safety Committee for Diablo Canyon? (SONGS)

**Response to Question H.02:** SCE understands that the purpose of the Diablo Canyon Independent Safety Committee is to assess the safety of operations and suggest any recommendations for safe operation. At all U.S. nuclear power plants, the NRC Resident Inspector Program includes a rigorous and ongoing assessment of safety which is extensively discussed in the public record. This assessment ensures that station management receives necessary independent input required for safe operation. Duplicating this input from another independent source would result in an unwarranted and unacceptable distraction to station management.

**A4NR: In their response to H.02 SCE asserts of the potential Independent Safety Committee, “Duplicating this input from another independent source would result in an unwarranted and unacceptable distraction to station management.” Has SCE conferred with PG&E and asked that utility if that is the conclusion PG&E has drawn from its experience of the DCISC? If that analysis is not the result of a consultation with a facility that has an Independent Safety Committee, then on what basis does SCE makes its assertion?**