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Vice President

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November 17, 2008

California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Dear Commissioners

RE: 2008 Integrated Energy Policy Report Update (08-IEP-1F)
Southern California Edison Company's (SCE) Follow-up Comment to the Final Report: AB1632 Assessment of California's Operating Nuclear Plants

Southern California Edison (SCE) would like to provide clarification on one issue as discussed in the referenced Final Report regarding storage of used fuel at SONGS 2 & 3. On page 215 of the subject report, it states:

> "SCE has designed, permitted and is constructing a dry cask storage facility for SONGS with capacity to store 36 percent of the spent fuel generated during the current license period. Even with the additional storage available in the SONGS spent fuel pool, SCE will need to develop additional on-site storage or secure offsite storage to store all of the spent fuel to be produced during the plant's current operating license (Table 14)."

The 36 percent, as noted above in the Final Report, is correct. SCE, however, feels that clarification is required to more accurately understand SCE's position.

SCE selected a modular dry cask storage system for SONGS. Storage modules are installed on an as-needed basis. SCE has elected, at this time, not to construct dry cask storage capacity to store ALL used fuel through the end of the current license period. It is important to note, however, that SCE <u>does have sufficient space</u> in the SONGS Unit 1 footprint to add additional dry cask storage modules; thereby increasing capacity to store all SONGS 2 & 3 used fuel through the current license period, if needed. SCE's strategy is to construct dry cask storage capacity in a time frame that supports full core offload capability at SONGS 2 & 3 as required by the NRC[1] during the current license period to avoid construction costs of dry cask storage capacity that may not be required. If, for example, the DOE commences removal of used fuel from the SONGS site in 2017, then the current dry cask storage capacity may be adequate to off-load the SONGS 2 & 3 used fuel from the spent fuel pools to the dry cask storage facility without incurring additional construction costs to increase dry cask storage capacity. If the DOE does not remove used fuel from the SONGS site commencing in 2017, SCE would still have sufficient

[1] Updated Final Safety Analysis Report, Updated June 2005, Section 9.1.2.2, page 9.1-11.

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time and space to construct additional dry cask storage capacity on the SONGS site to accommodate the used fuel generated during the current operating license. It should be noted that SCE has sufficient space in the SONGS Units 2 & 3 spent fuel pools and SONGS Unit 1 footprint to store all used fuel through possible license renewal.

SCE again wishes to express its appreciation for the opportunity to participate in this process.

If you require additional information, please contact me or Jose Perez.

Sincerely,

Michael P. Short

Michael P. Short
Vice President, Engineering and Technical Services

Cc: Barbara Byron