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June 11, 2015

Karen Armes
Acting Regional Administrator
Federal Emergency Management Agency, Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Subject: Decommissioning of San Onofre Nuclear Generating Station

Dear Ms. Armes:

The California Governor's Office of Emergency Services (Cal OES) has received information that the Nuclear Regulatory Commission (NRC) has granted a Request for Exemption to the San Onofre Nuclear Generating Station (SONGS).

As the Federal Emergency Management Agency (FEMA) is aware, SONGS and its governing utility, Southern California Edison, have been in the process of decommissioning since 2013. We understand that per the NRC, upon granting the utilities' Request for Exemption, responsibilities for preparing, reviewing, and testing emergency plans and readiness under federal regulations will no longer apply to the entities--federal, state and local--that handle SONGS offsite radiological emergency preparedness.

While Cal OES understands this process is triggered by the NRC notification, its timing simply has not allowed adequate time for a thorough evaluation of safety and preparedness at this site, as well as a process to phase down related activities. The public also needs as much reassurance as possible that necessary safety measures are continuing in a unified effort by all parties.

Rather than abruptly end this program, we urge FEMA to continue working with Cal OES, the NRC and affected jurisdictions to determine a plan and acceptable timeframe to phase down offsite emergency preparedness activities related to SONGS.

Thank you for your consideration in this matter. If you have any questions please contact me, or your staff may contact Deputy Director Tina Curry at (916) 845-8533.

Sincerely,

MARK S. GHILARDUCCI
Director

Cc: Tom Palmisano, Vice President and Chief Nuclear Officer
Donna Boston, Director of Emergency Management, Orange County Sheriff's Department
Holly Crawford, Director, San Diego County Office of Emergency Services
Mike Rose, Director of Disaster Preparedness and Facilities, City of Dana Point
Tom Bokosky, Human Resources Manager, City of San Juan Capistrano
James Makshanoff, City Manager, City of San Clemente