

December 19, 2019

Via Overnight Mail

Mr. Bruce Watson
Ms. Zahira Cruz Perez
Nuclear Regulatory Commission
11555 Rockville Pike, TWFN
MS 5 A10
Rockville, MD 20852

Subject: Documents Related to Department of Navy Request for NRC Unrestricted Use
Determination for SONGS Mesa Lands and the Unit 1 Construction Debris Area

Mr. Watson/Ms. Cruz Perez:

Southern California Edison Company (SCE) leases Mesa Parcels 5, 6, 7 and 10-14 from the Department of the Navy (DoN) to support San Onofre Nuclear Generating Station (SONGS) operations. As SONGS is no longer operating, SCE is terminating the Mesa lease for those seven parcels and returning the land to the DoN. As part of that process, the DoN requires SCE to supply a letter from the NRC or the California Department of Public Health (CDPH) stating the property is available for unrestricted use from a radiological perspective. Both the NRC and CDPH provided such letters, dated December 1, 2015 and December 1, 2016, respectively. The DoN believes neither letter clearly concludes the Mesa and Unit 1 Construction Debris Area (CDA) are available for unrestricted use. During a November 25, 2019 conference call among DoN, NRC, and SCE representatives, the DoN explained its request for NRC clarification that the Mesa lands and the CDA are available for unrestricted use.

You requested SCE provide documentation related to the 11 events where SCE evaluated the potential presence of SONGS-licensed material inadvertently transferred to the Mesa, including the documentation related to the disposal of Unit 1 soil, asphalt and concrete in the Unit 1 CDA area southeast of the Mesa. The CD enclosed with this letter contains the requested documentation, including:

1. A folder with the May 16, 2016 SCE letter to California Department of Toxic Substances Control (DTSC) transmitting SCE's radiological assessment of the Mesa parcels, which concluded that no detectable radiological contamination from SONGS-related plant activities is present on the Mesa parcels and the Unit 1 CDA. The DTSC provided the information to CDPH. The CD's folder contains radiological assessment memos to file, survey results, copies of certain Annual Radiological Environmental Operating Reports, and other information.

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2. A folder with key correspondence to and from SCE, DoN, NRC, and CDPH requesting information, responding to requests and transmitting information related to the Mesa radiological assessments.
3. A folder with NRC Inspection Reports related to the 11 events discussed above. Note, SCE could not find in its files Inspection Report 50-206/83-20. Inspection Report 83-27 is a follow-up to IR 83-20, and is included.
4. A folder with Unit 1 CDA related material, including figures, Individual Task Assignment (ITA) No. 84311, and an April 28, 2014 Memo discussing the adequacy of prior radiological surveys at the CDA. The last two items are also included in the material SCE sent to the DTSC, along with IR 50-206/81-02.
5. A figure showing the location of Mesa Parcels 5 – 7 and 10-14. Photos showing the location, and prior and current status of Mesa Parcel 4 (sometimes referenced in the provided documents as the “Lower Mesa”). The SCE lease for Parcel 4 was terminated in 1986 and the land returned to the DoN. The DoN regraded the area to develop evaporative ponds, which continue to exist today.
6. A May 28, 2015 Memo to File and its two tables, which Memo includes all the ITAs except ITA #89069. This Memo to File is separated from the CD folders because the Memo provides an excellent description of the 11 events and contains the ITAs and two Action Requests listed in the tables as being associated with the 11 events. Please note that ITA #89069 is not included because it deals with a worker exposure issue. Should you wish to see that information, please let me know.

If you have any questions or the information on the enclosed CD is insufficient for the NRC to respond to the DoN, please contact me at (626) 302-4459 or by email at nino.mascolo@sce.com. We greatly appreciate your assistance in responding to the DoN with regard to this matter.

Sincerely,



Nino Mascolo

cc: Al Bates, SCE
Stevie Vaughan, SCE