

December 1, 2015

CDR Douglas W. Fletcher
Radiological Controls and Health (N455A)
Energy and Environmental Readiness Division
Office of the Chief of Naval Operations
2000 Navy Pentagon, Room 2D253
Washington, DC 20350

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION PERSPECTIVE REGARDING
PROPERTY RELEASE OF THE "MESA" AREA AT THE SAN ONOFRE
NUCLEAR GENERATING STATION

Dear Commander Fletcher:

Thank you for contacting us regarding the decommissioning activities underway at the San Onofre Nuclear Generating Station (SONGS), and more specifically, what the U.S. Nuclear Regulatory Commission's (NRC's) role is with respect to the termination of Southern California Edison's (SCE) leasehold interest in the "Mesa" area and its return to the control of the Department of the Navy (Navy). The Mesa area is outside of the NRC's licensed boundary for SONGS, and therefore, absent any evidence of current radiological contamination linked to licensed activities at SONGS, is not subject to the NRC's regulatory authority.

We are aware of the enclosed letter to Ms. Yilma of SCE, requesting that the Mesa site achieve a release criteria of no more than 12 mrem per year, and that SCE provide the Navy with a letter from the NRC confirming the findings regarding radionuclide levels at the Mesa site. However, while we understand that certain radiological contamination events took place in the Mesa area during the 1980s, the NRC has affirmed that SCE appropriately addressed and remediated these events, as shown by the documents attached, as well as NRC's Inspection Report (IR) # 50-206/81-02. As noted in IR # 50-206/81-02, the NRC resident and health physics inspectors verified the clean-up of those portions of the Mesa area affected by these events, which included the removal of the contaminated items. Since that time, SCE has continued to perform regular monitoring of the Mesa area as part of the SONGS Radiological Environmental Monitoring Program (REMP), a program all NRC reactor licensees have in place to monitor potential offsite radiological contamination.

In addition, prior to seeking termination of its lease agreement with the Navy, SCE opted to perform a radiological survey of the Mesa area in 2014 that showed no residual radioactivity above the regulatory limits set forth in NRC regulation 10 CFR 20.1402, which is a total effective dose equivalent (TEDE) to an average member of the critical group (e.g., a member of the public) that does not exceed 25 mrem per year. In addition to this survey, the NRC has no knowledge of any other licensed activities being performed in the Mesa area (including any additional radiological contamination events as reported through the SONGS REMP) since the 1980s. Thus, the NRC concludes that the Mesa area is not subject to licensing by the NRC (i.e., suitable for unrestricted use), and its legal disposition is not within the NRC's regulatory purview for decommissioning SONGS.

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Members of my staff have been involved in conversations on this and other topics with personnel at Camp Pendleton, and I have copied Stanley Norquist, Director of Environmental Security, at MCB Camp Pendleton for his awareness. If you have additional questions or concerns, please contact Ms. Marlayna Vaaler, SONGS Project Manager, who can be reached at 301-415-3178, to facilitate further discussions.

Sincerely,

/RA/

Andrew Persinko, Acting Director
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket Nos.: 50-361 and 50-362

License Nos.: NPF-10 and NPF-15

Enclosures:

1. Letter from D. Bixler (Navy) to M. Yilma (SCE)
2. Letter from T. Rehm (NRC) to A. Cranston (U.S. Senate)
3. Letter from SCE to F. Wenslawski (NRC)
4. SONGS 1 Inspection Report 50-206/81-02

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