



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3000 MARINE CORPS PENTAGON
WASHINGTON, DC 20350-3000

5104
SD
20 Sep 16

From: Commandant of the Marine Corps
To: Southern California Edison Company
2244 Walnut Grove Avenue, Rosemead, CA 91770

Subj: SAN ONOFRE NUCLEAR GENERATING STATION MESA LEASE CLEAN UP
REQUIREMENTS

Ref: (a) NAVFAC SW ltr 11011 Ser RAV00.ER/320 of 20 Aug 15
(b) SONGS Mesa Lease N6247310RP00168 of 01 Apr 11
(c) NRC ltr of 01 Dec 15
(d) SCE ltr of 19 May 16
(e) EPA Directive 9200.4-40 of May 2014
(f) PHONCON HQMC Safety Division CDR Beery/NAVSEA DET RASO LCDR
Sorci/SCE Mr. Mascolo/RSCS Mr. Tarzia of 22 Aug 16

1. Reference (a) provides the conditions necessary for partial termination of reference (b); specifically the MESA Site, Parcels 5, 6, and 7. One of the conditions necessitates the MESA Site achieve a release criteria of no more than 12 mrem/year and requires that Southern California Edison (SCE) provide DON with a letter from the Nuclear Regulatory Commission (NRC) confirming this requirement.


2. Reference (c) provides NRC's perspective on the radiological contamination events that took place in the Mesa and concludes SCE appropriately addressed and remediated these events. However, the NRC would not confirm the Mesa met the release criterion of 12 mrem/year, instead stating the Mesa showed no residual radioactivity above their regulatory limit of 25 mrem/year (set forth in 10 CFR 20.1402). The NRC also confirmed the Mesa is not within their regulatory purview. Therefore, DON will defer to EPA's authority regarding the cleanup and assessment of any radiological contamination at the MESA.

3. Reference (d) provides a radiological assessment performed by SCE that gives an upper bound radiation dose estimate to a member of the public who occupies the Mesa property assuming residual radioactivity is present at the detection limits of the equipment utilized to conduct the radiological surveys. This report provides good evidence that the Mesa does not exceed 0.8 mrem/year.

4. References (c) and (d) provide good evidence that any residual radiological contamination in the Mesa is equivalent to background levels. However, while the DON applauds the conservative approach taken by SCE in reference (d), the DON requests SCE use the detection limits of the radiological surveys conducted and apply reference (e) to determine the risk level,

and thus determine whether the Mesa meets the 12 mrem/year criterion. This approach was discussed with SCE during reference (f).

5. The point of contact is CDR Matt Beery at 703-604-4122 or at matt.beery@usmc.mil.


J. D. WILLIAMS
By direction

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