



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND SOUTHWEST
1220 PACIFIC HIGHWAY

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Ser RAR00.AB/093
May 3, 2018

Mr. Gonzalo Perez
California Department of Public Health
Radiological Health Branch
1500 Capitol Avenue, 5th Floor, MS 7610
Sacramento, CA 95814-5006

Dear Mr. Perez:

**SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION (SONGS) MESA
RADIOLOGICAL DOCUMENTATION CLEANUP REQUIREMENTS**

Thank you for joining us on the 1 February 2018 conference call to discuss the Department of the Navy's (DoN) questions and concerns regarding radiological clearance for SONGS and specifically the Mesa Facility and other properties documented in Southern California Edison's (SCE) *Mesa Radiological Assessment*. The DoN is requesting that California Department of Public Health (CDPH) provide a Radiological Unrestricted Release Recommendation (RURR) letter (or equivalent) for the Mesa Facility to the Department of Toxic Substances Control (DTSC) under its Voluntary Cleanup Program. If CDPH cannot accommodate such a request at this time, then the DoN requests that CDPH provide guidance for the appropriate actions and documentation to obtain a RURR letter for the Mesa Facility. Additional background information is provided below.

SCE is in the process of Decontamination and Dismantlement (D&D) for SONGS, which is located along the west side of Interstate 5 on Department of Navy (DoN) property (Marine Corps Base Camp Pendleton). Adjacent to the nuclear plant but along the east side of Interstate 5 is an area referred to as the Mesa Facility, which was used for SONGS support facilities and was not planned to be used for radiological activities or storage and therefore was not included in the U.S. Nuclear Regulatory Commission (NRC) license. However, records show that since the 1970s, transfer of contaminated equipment and tools from SONGS was occurring until the late 1980s or beyond. In the 1980s, SCE conducted some surveys and remediation but the documentation provided is incomplete to demonstrate that NRC provided oversight for all radiological events. Additionally, any surveys conducted at that time would have likely been conducted for the purposes of worker health and safety and not in support of a land transfer.

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In order to ensure that the DoN does not accept any liability associated with SONGS related activities, the Navy has asked SCE to provide documentation demonstrating that the Mesa Facility is suitable for unrestricted use, for both radiological and chemical contamination, which would include regulatory oversight and Unrestricted Use/Unrestricted Exposure (UU/UE) No Further Action letters (or equivalent). In response, SCE provided a document titled *Mesa Radiological Assessment* dated April 2014 and an amendment dated May 2015. Along with the report, SCE provided a letter from NRC dated 1 December 2015 and a memo from CDPH (from Rajiv Mishra to Roger Lupo) dated 1 December 2016.

The DoN is of the opinion that the documentation provided by SCE does not support land transfer and SCE lease termination requirements, as none of the documentation specifically provides the equivalent of a UU/UE No Further Action letter (i.e., RURR letter for radiological concerns) and does not clearly demonstrate regulatory oversight for all radiological events documented in the *Mesa Radiological Assessment*.

Therefore, the DoN proposes a site walk and meeting at the Mesa Facility with CDPH, DTSC and SCE to discuss the next steps towards obtaining a RURR letter. Please let us know if you need more information or if you have any questions. My point of contact on this matter is Bryce Bartelma at 619-532-4953 or bryce.bartelma@navy.mil.

Sincerely,



AMANDA BARBER
CDR, CEC, U.S. Navy
By the direction of the
Commanding Officer

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SCE