

## State Water Resources Control Board

JAN 08 2014

Mr. David Asti  
Manager, Corporate Environmental Policy  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

Dear Mr. Asti:

RE: REPORT ON REDUCED COOLING WATER INTAKE FLOWS AT SAN ONOFRE  
NUCLEAR GENERATING STATION

The State Water Resources Control Board (State Water Board) appreciates the submittal of the report of San Onofre Nuclear Generating Station's (SONGS's) plans for ocean cooling water intake flows (Report). Southern California Edison (SCE) requests a further review of the Large Organism Exclusion Device (LOED) requirement, and asks to be exempted from the special studies requirement of the Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Policy).

The Report states that following cessation of normal operations, there is now a 96 percent reduction in the intake flow rate and a 0.1 feet per second (fps) through-screen intake velocity. The State Water Board requests that SCE provide support for these claims by submitting current seawater intake data to demonstrate compliance with Track 1 of the Policy. The State Water Board concurs that the retirement of SONGS and substantiation of the above-mentioned reductions in intake flow rate and intake velocity would permit an exemption from the Policy requirement to complete special studies, as set forth in Policy section 3.D.

Section 2.C.(1) of the Policy requires the installation of LOED for offshore intakes. The State Water Board previously provided time extensions for compliance with the LOED requirement, such that the current deadline would be April 30, 2014. However, as set forth in my letter dated July 17, 2013, the requirement to install LOED has been suspended, conditioned upon a requirement to explore methods of eliminating the intake and use of ocean water for cooling during the shutdown process for SONGS. The State Water Board will continue to consider this requirement as suspended, but requests additional detailed information on the preliminary assessment of an alternative that is referred to as of the spent fuel pool "island."

Pursuant to Water Code section 13383, please provide the following by March 1, 2014:

1. Further analysis and supporting documentation for the basis of the 96 percent reduction in intake flows and the 0.1 fps through-screen intake velocity.

2. Additional information on the spent fuel pool "island" alternative, including projected milestones and completion dates for any studies planned or underway.

If you should have any questions, please contact Mr. Jonathan Bishop, Chief Deputy Director at (916) 341-5820 ([Jonathan.Bishop@waterboards.ca.gov](mailto:Jonathan.Bishop@waterboards.ca.gov)), or Dr. Maria de la Paz Carpio-Obeso, Chief of the Ocean Unit, at (916) 341-5858 ([mcarpio-obeso@waterboards.ca.gov](mailto:mcarpio-obeso@waterboards.ca.gov)).

Sincerely,



Jonathan Bishop  
Chief Deputy Director

cc: Ms. Marleigh Wood  
Sr. Staff Counsel  
Office of Chief Counsel  
State Water Resources Control Board  
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Sacramento, CA 95814

Ms. Shuka Rastegarpour  
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