

**Comment Set CC6**  
**CREED**

**Comments by CREED Liaisons**

in Response to California Public Utilities Commission Request for  
Comments on the Draft Environmental Impact Report on Proposed  
Replacement San Onofre Deteriorating Generators

**Part I**

CREED is appreciative that the CPUC seeks to "identify concerns of affected parties." We are affected parties, residents of the hazard zones identified by the Federal Nuclear Regulatory Commission, California state agencies and legislature. We are liaisons to local and state agencies and to community non-governmental organizations.

This is a composite of our individual concerns and requests. These comments have not been reviewed/approved by the entities to which we are liaison, except letters detailing specific organization board actions.

Aspen's draft document is an excellent beginning of the varied issues and assessments that will present a basis for determination of choices to be weighed in determining a process of replacement of generators. or a judgment of "no project alternative" such as "combinations of replacement transmission and generation."

CREED requests expansion of the considerations beyond the impacts of process of replacement, and notes that the main assessments of the Draft entailed alternative transportation routes, noise mitigation, and reduction of dust generated by cement cutting. CREED submits that these concerns are trivial when measured aside the vast human environment, natural resources and marine and biological environment issues. The EIR must review these essentials in comparison of the "project" effects with the composite renewables alternative.

The Environmental Impact Report must address the long-term impacts and the potential of perhaps years of repair and replacement resulting in a possible 20 year extension of "substantial adverse impacts"---issues of the EIR.

We ask that the experience of the attempt to rebuild San Onofre Unit I be assessed as a similar progression of adverse impacts that might be expected in this new attempt--- to rebuild Units II and III. These significant impacts present a cumulatively unmitigable---thus unacceptable---project proposal that must be presented in full in the EIR evaluation.

Individuals and organizations are rallying to San Diego Gas and Electric's fast track solicitation of bids from a wide array of renewable and distributive energy generation sources to replace the fossil and nuclear generating technologies, in a long overdue transition to California energy independence.

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CREED supports the combination of clean, safe, low-cost, small-scale renewable/distributive energy sources, fuel efficiency and "sustainable community" conservation measures to meet our electricity needs in southern California by the end of the decade. Reliance on a transition that includes natural gas would be preferable to the other fossil fuel sources.

We urge Aspen, and CPUC, to select a composite of these alternatives, with predominance of roof-top or building mounted photo-voltaics, as the environmentally superior alternative. CREED submits that this composite, that ranks a "no significant negative impacts" assessment can validate a no project decision by the CPUC in rejection of Edison's proposal for domination by new nuclear power generation. Energy independence for California, as a precursor to national energy independence, is a CREED priority goal.

This summary recommendation represents CREED Steering Group consensus.

Marilyn J. O'Brien, for Creed Steering Group  
Past president of American Association of University Women, Capistrano Bay Branch, first intervener organization to oppose San Onofre II and III licensing.

31111 Via Madera, San Juan Capistrano, Ca. 902675

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**CREED Parts 2 Through 13 of Draft EIR Comments on  
Issues to be Addressed in Revisions of Draft**

**THREE FUNDAMENTAL CONSIDERATIONS IN THIS IMPACT REPORT**

1. Negative impacts of San Onofre vulnerability to terrorist attack.
2. Nuclear plant incremental replacement constitutes "rebuilding," and entails assessment of consequent negative impacts of life extension of the deteriorating reactors.
3. Need for a course of action that implements the California Legislature's, the California protective agencies' (CPUC, CEC) and the Governor's established goals and requirements for transition from fossil and nuclear to the benign and renewable sources of energy (20% by 2017 and 20% by 2010).

**The following comments and notes have been selected for inclusion in this report as valuable information and parameters for the EIR analysis.**

**BIOLOGICAL RESOURCES (ISSUE IV)**

The scoping outline addresses negative impacts to sea creatures during the physical act of replacing the generators. The issue is much broader than that. Expansion of this item/issue will provide analysis of negative impacts of ongoing slaughter of fish and other sea creatures in all stages of their physical development. The creatures are drawn into the coolant water system and mangled in process of routine operation of the system. The negative impacts of this process are so vast that the California Coastal Commission set mitigation measures. They appointed a team of marine biologists to monitor the destruction, and following their reports, required Edison to build an artificial reef for help to replenish the fish population.

The potentials for catastrophic damage by San Onofre from malfunction or terrorist attack are very speculative, but the destruction of the sea creatures is massive ongoing slaughter.

If Edison's response to the end of the operating life of the generators is to replace them, rather than decommission the reactors, the slaughter will continue for however long the reactors operate, and those negative impact minutes, hours, days and years should be recorded, and weighed in the comparison with potential renewables alternatives.

Also needed, is assessment of chemical/toxic waste streams in which "o" tolerance chemicals are disposed into the ocean under a "delusion of dilution" theory. The contention is that large quantities of water can dilute and render lethal chemicals acceptable, "because the quantities of the chemicals are so small." Mercury in the food chains through fish populations may be a result of that deceptive policy.

Wendy Morris, CREED Liaison to Surfrider; wendymorris@worldnet

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**REVIEW OF POTENTIAL IMPACTS OF TERRORIST ATTACK AND  
NEED FOR ASSESSMENT OF POTENTIAL ACCIDENT AND ATTACK**

results from nuclear plant mechanical failure, human error and terrorist attack---based on varied scenarios---be compiled and compared with any viable alternatives to rebuilding action. Since Edison falsifies injury records (was given a Nuclear Regulatory Commission fine for extensive on-going falsification, just last month) it might be more accurate to do some confidential worker interviews for the EIR assessment. Workmen tell us occasionally about old-timers who die from cancer. These deaths are not reported in the press, and we are told that the families are generously provided for. We may be able to get interviews for you, if you decide to assess them as significant negative impacts.

Dr. Gordon Thompson of the Institute for Resources and Security Studies comments on the security risks posed by the radioactive isotopes that are potential hazards of nuclear power plants. "Nuclear power plants are key national assets that are especially likely to be targeted by enemies of the US."...the Nuclear Regulatory Commission currently requires only a light defense of US nuclear power plants and spent fuel. As a result, these facilities are vulnerable to sophisticated, determined attack."

Note: The government of France provides guards for the nation's power plants armed with anti-aircraft guns.

The first report of Homeland Security identified nuclear power plants as "most vulnerable to terrorist attack."

Joseph Malherek of Public Citizen, in a press release on Oct. 18, 2004 reported that 27 state attorneys generals warned Congress in October 2002 that the consequences of a catastrophic attack against one of the country's 103 nuclear power plants "are simply incalculable."

The plants were not designed to withstand the impact of aircraft crashes or explosive forces, and the government does not require nuclear plants to be secure from an aircraft attack. Radioactive waste is stored in standing pools or dry casks, making it vulnerable, and the plants have grossly inadequate security."

This risk incurs manpower, equipment, planning time and acquisition time and financing efforts. The negative impact of such risk of attack is difficult to estimate, but it is certainly significant.

Karen Speros, President of WAND, Women's Action for New Directions  
44 Rocky Knoll, Irvine, Ca. 92612

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**VULNERABILITIES IN REACTOR-LIFE EXTENSION**

**Note: California Office of Emergency Services calculated that a release of radiation from a San Onofre catastrophic accident could contaminate for a distance of 200 miles and could extend into Mexico, creating an international incident.**

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Comment: Sections of the report should cover assessment of impacts on population groups, their age, mobility, self sufficiency, medical needs, etc. They should be divided according to contamination damage in various evacuation planning zones, ie. 3 mile, 10 mile, 50mile planning, and potential for negative impact reported in time and motion studies.

It is urgent that comprehensive analysis of potential significant negative impact

**GEOLOGY AND SOILS (ISSUE VI)**

The scoping checklist appears to be comprehensive on this issue. The Aspen group references recent seismic record. Testimony by CREED marine geologist re the new discoveries of the thrust faults on the San Onofre site is available from the California Coastal Commission.

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Reference: See Nicol testimony in San Clemente CPUC scoping session

Ricardo Nicol: seismic researcher on CREED San Onofre Focus Group; liaison to San Clemente Rotary; former San Clemente City Planning Commissioner; 2315 South Ola Vista, San Clemente, CA 92672

**Note: Since Federal Emergency Planning Agency bears the responsibility for guiding emergency planners, it acquires impact assessment information, and should provide the info for inclusion in this EIR.**

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**Congressman Christopher Shays has ordered a FEMA comprehensive re-assessment of San Onofre area evacuation viability. His office might become another information source.**

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TRANSPORTATION/TRAFFIC (issue XIV)

Potential traffic conditions during proposed extension of nuclear generators' life span are a concern. They show significant negative impact. Careful scrutiny to the importance of traffic overload conditions on the segment of Freeway I-5 adjacent to the San Onofre site is needed.

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Interstate 5 (I-5) is the major north south route that is used for inter-regional, interstate and international travel and goods movement. It traverses diagonally about 44 miles through Orange and San Diego counties, and Los Angeles County to the north. .

I-5 serves as the backbone of Southern California Transportation network, connecting the major urban centers of Los Angeles, Orange County and San Diego.

The average daily traffic (ADT) varies from 115,000 to over 300,000 vehicles. Also, most major state and local county routes intersect I-5. The current level of Service (LOS) at Peak AM and PM hours is approaching F (failure). If no improvements are made to increase capacity in the I-5 Corridor, LOS F will mean that longer traffic delays will occur.

**SOCIOECONOMIC DATA FOR THE YEAR 2020—  
POPULATIONS AT RISK**

County: population 3,200,000; housing units 1,100,000; employment, 2,100,000---Data Source: Orange County Transit Authority and Southern California Association of Governments

Region: population 20,600,000; housing units, 7,150,000; employment, 10,000,000---Data Source: L.A., Orange, Ventura and Metropolitan portions of Riverside and San Bernardino Counties.

Both population and traffic counts increase every year, so that official projections for San Onofre's potential impacts on people caught in the freeway congestion increase commensurately. Even though the police move quickly in an accident of San Onofre, closing off freeway lanes carrying traffic toward the plant, from both directions, the freeway full of traffic in the vicinity of the plant would be negative impact of tragic dimensions. There should not be a freeway running by the nuclear plant--or there should not be a nuclear plant next to a freeway. Please note the potential negative of this impact.

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The extended-life generators are appropriate evaluation subjects. I-5 corridor will require stringent traffic control, limiting vehicular traffic to and from access to the route, in case of a major event at San Onofre.

Widespread radiation contamination from a San Onofre accident could cut-off that 20,600,000 population from its north/south lifeline, indefinitely.

How many extra years will the hazard of lack of access be threatened? These effects should be factored in to assessment of impacts.

Doris Walker Smith, Author and California Historian, Official Historian of Dana Point and Orange County

Robert Joseph, Caltrans Planner, CREED San Onofre Focus Group  
207 Avenida de la Riviera, San Clemente, Ca. 92672

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## Hazardous Materials Transport VII

Between Freeway I 5 and the San Onofre Nuclear Generating Plant runs a double rail line that serves Santa Fe freight, Amtrak and a local morning and evening train system to transport workers to their daily employment.

A Public Citizen report by Joseph Malherek, of October 2004, notes that "the trains and trucks that carry tens of millions of tons of toxic chemicals and other hazardous materials annually on our highways make tempting terrorist targets.

" More than half of the nation's 60,000 rail tank cars carrying hazardous materials are too old to meet current industry standards and thus are more likely than newer cars to break open after derailling. A weapon as simple as the legal, widely available 50-caliber rifle has the potential to inflict serious damage on a train , car or truck carrying lethal materials, by penetrating tanks and causing an explosion or derailment.

"Despite the risk, though, there are insufficient checks on where trucks carrying hazardous materials may drive; insufficient oversight and tracking of the types, amounts and locations of trucks

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moving these lethal loads; and insufficient controls on the issuance of commercial licenses for drivers of trucks carrying hazardous materials. Legislation to assess rail security has been blocked"... and other safety proposals have been dropped because of industry opposition."

The draft EIR note that deliveries during installation activities would amount to 200 trips per day (D 13-9) and 400 per hour during shift changes (D 13-10) present an impossible congestion of already congested roadway. All southbound lanes of I-5 closed for an hour during each transporter passage would cause utter chaos for commuters, tourists and commercial trucking. The possibility of significant accidents is increased by these conditions. These unmitigable impacts must be reported in the project EIR. Also, lengthening the life of the generators would create a lengthening of the significant hazard to the public through the routine transport of hazardous materials.

CC6-12

Billie Pinnick Lovmark, former government and economics teacher; participant in CREED San Onofre Focus Group 328 Boca del Canon, San Clemente, Ca. 92672

Aesthetics (item I); Land Use and Planning (item IX);  
Public Service (item XII); Recreation (item XIII)

In the Land Use and Planning arena, the California Coastal Commission recognized the significant negative impact of the nuclear reactors on the beach, and they voted against the permit to build Units II and III. Under pressure from the nuclear industry, powerful appropriations legislators threatened to withdraw the financing of the Commission in the following year---if the fledgling Commission refused to reverse its vote. The Commission agonized to a reversal, and the magnificent weather-sculptured sand-stone bluffs were cut down. The costly, lethal polluting and hazardous reactors were raised up on the beach where the Commission gave them temporary space. Now, as the deteriorating reactors---breeding a burgeoning nuclear waste dump on our precious beach---are dieing, Edison chooses to rebuild and extend the life of "significant negative impacts."

San Onofre State Beach Park Parcel I is a magnificent master-planned camping park, from the white sand beaches and world famous surfing waves, where the San Mateo Creek touches the sea in southern California's lone remaining unpolluted beach.

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The extensive planning for this precious land was conducted by the Parcel I Planning Committee of the San Onofre State Beach Park Advisory Commission. The Commission was appointed by the Director of Department of Parks and Recreation and the Governor of California. The planners worked their plan through the many approvals, including the State Parks Department and the Department of the Navy. The park development has lain dormant, with only a small camp ground inland. The beach edge of the inland parcel is only a mile-and-a-half hazard distance from the San Onofre nuclear reactors. The camping development is not likely to come until the nuclear power installation is cleaned from the beach in the middle of the San Onofre Beach Park.

The need of the citizens of California for recreational use of the unique sunshine climate sand beaches and unsurpassed surfing waves that they own, has overwhelmed the parks. Many Thousands are denied that beach park camping experience. Every year as the camp sites are reserved in advance by the lucky families. The miles of beach on each side of the nuclear plant are packed, as well.

The unmistakably significant positive impact of the availability of the park beaches translates, on the flip side, to unmistakable significant negative impact of the nuclear plant blight on the beach. The EIR should assess that recreational loss in numbers of persons per space and hours of time increments of both camping and day-use facilities, multiplied by an estimate of extended time. How the Aspen Group will assess that potential recreational loss of the nuclear site---by nuclear rebuilding/extension, by a few years, or by 12 or 20 years---or into the indefinite future---we cannot predict, but we submit that the consideration of this priceless 84 acre oceanfront site must be added to the evaluation of these items/sections of the EIR

Ruth Yeilding, Former Chairman of the San Onofre State Beach Park Citizen Advisory Commission  
114 East Avenida San Juan, San Clemente, Ca. 92672

Lyn Harris Hicks, former San Onofre State Beach Park Citizen Advisory Commission  
Chair. Of Parcel One Planning CREED Steering Group and San Onofre Focus Group

**HAZARDS AND HAZARDOUS MATERIALS (Issue VII)**

This is the "number one" significant negative impact of the proposed project. Many of the other issues are significant because of the extreme hazard conditions, materials and vulnerabilities.

Quantities of hazardous mixed waste, (radiated chemicals, explosive and inflammable bi-products of electric generation in a nuclear power

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plant) may be obtained from the California Environmental Protection Agency Division of Toxic Substances Control, Walter Bahm, 510 540 3937. These are considered short-term storage materials, kept on-site for not longer than a year without special permit for a longer storage.

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The most hazardous radioactive materials are the radiated ("spent fuel") rods, hazardous for thousands of years. Assessment of the potential impacts is complex. It is estimated that an additional 10 years of this lethal material would generate 500 tons of significant impact, a fact that should be included in the EIR.

Some of the rods are stockpiled in cooling tanks, and others have been encased in "dry casks. Everything is on the beach-bluff area surface ; no site meets the NUREG 50-100 requirements for repository deep underground, distant from population centers, not in a seismic danger area, and in monitored casks that can store the lethal material isolated from water intrusion for thousands of years.

Cataloged nuclides produced by San Onofre can be obtained from the Toxics Control Division, Cal EPA.

**AGE RELATED DETERIORATION OF SAN ONOFRE REACTORS**

Just as an ancient car traveling at high speed on the freeway is much more likely to break-down than a new vehicle, EIR consideration must be given for the increased hazards associated with degradation of nuclear power generating plant machinery that works in conjunction with new generators.

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The following statement is quoted from testimony in the Diablo Canyon comment material presented by Mothers for Peace, August 2, 2004.

"...a substantial body of experience in the nuclear power industry indicates that age-related degradation of structures and equipment, no related to steam generators degradation, is a significant, often undetected problem that necessitates costly repairs and lengthy outages, and that could challenge reactor safety margins..."

Appropriate assessments of negative impact of deteriorations underscore aging as a source of adverse plant performance and call for regulatory attention. Adverse plant performance is also a negative impact.

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The expert witness continued, re PG&E generator replacement application similar to San Onofre's...."without a serious analysis of age-related degradation, together with its associated repair and/or replacement...as well as associated power replacement...PG&E's application is deficient."

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Witness: David Lochbaum, Union of Concerned Scientists Nuclear Safety Engineer

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**NEED FOR NUCLEAR POWER PLANT PROTECTION  
FROM TERRORIST ATTACK**

The last two items of HAZARDS VII section present negative impacts of the very existence of nuclear power plants, that are vulnerable to terrorist attack, and have ineffective emergency evacuation plans, or have deficient fire protection.

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First: "Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan."

Second: "Expose people or structures to a significant risk or loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands."

Two years ago, a fire in San Onofre put a reactor out of production for five months. Unreliability is negative impact.

A conflagration from accident or attack might send flaming radiated materials high into the winds and spread fire through Camp Pendleton. Wildfire events on the Camp occur every fire season. The fires are usually started by gunnery practice, and sometimes burn into residential areas of San Clemente. However the nearest potential threat of a catastrophic San Onofre fire might be to the base housing community, Basilone, only a mile from the reactors.

An investigative report by Anne-Marie Cusac, an independent reporter gives an insight to the fire prevention controversy in the nuclear industry. Cusac notes that "instead of insisting that the plans have heat-protected mechanical systems in place that will shut down reactors automatically in case of fire, which is the current standard,

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the Bush Administration would actually let the power companies rely on workers to run through the plants and try to turn off the reactors by hand while parts of the facilities are engulfed in flames.”

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“The result could be catastrophic,” says a March 3 letter from Representative Ed Markey, Democrat of Massachusetts, and Representative John Dingell, Democrat of Michigan, to Nils J. Diaz, chairman of the Nuclear Regulatory Commission.

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Current regulations require plants to maintain two sets of electrical circuitry that enable the reactor to shut down automatically in an emergency. Fires are not uncommon at nuclear power plants. “Typical nuclear power plants will have three to four significant fires over their operating lifetime,” says a 1990 NRC document. “Fires are a significant contributor to the overall core damage frequency.”

CC6-17

A Nuclear Energy Institute, an industry group, admitted that many of its members did not have the required safeguards in place...unapproved operator manual actions (shutting down a reactor by hand) in event of a fire is pervasive throughout the industry. An inspector at the Shearon Harris reactor, where a near meltdown was experienced, said that one operator “ may be required to complete as many as thirty-nine manual actions.”

The NRC introduced a proposed rule change in November, 2003....instead of fire barriers, the plant operators could rely on personnel to turn the plant off by hand, in event of a fire that threatens the reactor. The rule is expected to go into effect as early as spring 2005.

An understanding of the current regulatory process is necessary for a recognition of potential negative impacts of nuclear power plants. This process---safety regulations at behest of the industry---has been occurring since the licensing of San Onofre.

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In the licensing process the regulators discovered that the proposed three-mile exclusion area(a protective area restricted to the presence of only plant authorized persons) encompassed State Beach Park day use area and campground, a section of residential area at south end of San Clemente, and bordered Concordia Elementary School. The

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licensing officials simply moved the line in to the boundary of the plant site.

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When new technology enabled plant managers to operate with less routine releases of radiation wastes from the stacks, the safety requirements were tightened to allow less release.

The CREED researchers who have observed these unethical processes, suggest that only a careful analysis of current operation can produce estimates of environmental impacts.

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An article in the Los Angeles Times in October, by Robert F. Kennedy Jr. tells of a 2003 General Accounting Office report that "faulted the administration for failing to bolster nuclear plant defenses and found faulty security the rule at nuclear power plants nationwide...and federal law absolves nuclear power operators from protecting themselves against attack by enemies of the United States." "...GAO and industry reports acknowledge that the industry's private security guards are undertrained, underequipped and demoralized,"

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In the months immediately following 9-11, CREED conducted a study to develop recommendations for RESPONSE TO TERRORIST SAN ONOFRE THREAT, and released the report to myriad elected officials and to protective agencies of government, in the following January. CREED has twice done the mailing, and no response has been achieved, except KI pills were distributed to adults in the evacuation zone of San Onofre. CREED KI Focus Group is conducting a campaign to obtain child dose KI for our school. (See copy of the response, report, attached.)

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ALTERNATIVES FOR ANALYSIS IN THE SAN ONOFRE  
GENERATORS REPLACEMENT EIR

CREED Steering Group members submitted suggestions for various combination of benign, renewable energy sources to replace one or both of the San Onofre reactors.

A coordination of goals is obviously needed: timing of installation to avoid blackouts, construction that facilitates the State goal of 20% renewable by 2010, homeland security goals to protect essential service installations, to minimize terrorist threat.

Our safety may lie in our rapid diversification of centralized essential resources---the big targets that we present to our future enemies.

A combination of solar, wind and tidal electric production might be feasible on the vast 20mile by 20mile Camp Pendleton, or perhaps the new trash-to-energy techniques would be beneficial in base trash elimination.

A thorough comparison of the benefits and the negative impacts of the nuclear and the renewables is needed for a valid EIR assessment. In weighing the replacement/rebuilding, the projected impacts must be calculated for the ENTIRE TIME-SPAN from onset of the re-building program to retirement of the units, factoring in estimates of the numbers and severities of injuries and deaths during the 10-20 year added hazard.

The experience record in the industry is that number and severity of injuries increase as the reactors deteriorate. This is comparable with expense of aging automobiles. It is the safety reason for the German

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Government ban on ancient cars driving on their Audubon, and reason for German rapid retirement of nuclear power plants---with ban on building new ones.

**CC6-20**

Cost comparisons are essential for the general proceedings noticed in the scoping instructions. EIR is inadequate without consideration of costs. When the "comparative merits of the alternatives" are developed, we would appreciate availability, for our assessment.

Lee Steelman, Past President of GUARD, interveners in San Onofre II and III licensing144  
Avenida de la Paz. San Clemente, 92672

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**GENERAL ISSUES SECTION OF THE EIR SCOPE**

Medical impact concerns for evaluation are myriad through the subject areas of this document, but we address only a sample.

CREED's KI Focus Group produced this statement to indicate the potential negative impact of failure of the nuclear industry and the Homeland Defense to provide KI for our children in schools and pre-schools and child care. The group is working with PTA leaders , county health department personnel and school district emergency planning director, to no avail.

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Through recent years it has been established by very credible research that it is imperative for children to receive potassium iodide following exposure during a radiation emergency. Research conducted by many nations, and outstanding research centers, have determined that the incidence of thyroid cancer in children increases due to exposure during radioactive incidences.

The studies investigating the relationship between thyroidal radioiodine exposure and risk of thyroid cancer is inversely related to age. In young children it may accrue at very low levels of radioactive exposure. The data that has been studied after the Chernobyl accident has established very reliable information about the short and long term very dangerous effects on children over a long period of time following exposure.

The importance of making potassium iodide available in all areas of our communities cannot be emphasized enough---this should include schools, homes and all possible areas in or communities.

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An indication of the magnitude of the growing negative impact of the Chernobyl accident, sixteen years ago, is the recent announcement by the government of the Ukraine that it no longer can provide medical care for the victims of Chernobyl.

San Clemente has one hospital , sixty thousand residents, and no stock of KI , nor adequate roadways to evacuate..

Marianne Brown, CREED KI Focus Group Leader; former nurse educator and retired hospital administrator. mariannebrown

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**"NO GENERATORS" ALTERNATIVE**

Our preferred alternative is renewable energy sources, predominately solar roof-top generation.

Edison could negotiate favorable, contracts with the Navy for siting solar on most of the roofs of Pendleton, including Basilone residential community and other base housing.

Timing for the generator replacements is 2009-2010, so there would be time to plan on renewables installation, in a five year plan that could be compared with generator replacement---in the EIR.

The industrial areas of San Clemente<sup>4</sup> and Oceanside would be sites for extensive solar roof-top installation, beneficial to all concerned.

A brief CREED summary of the advantages of distributed energy; is submitted for the comparisons, and as potential solution of the Energy Commission's current major crises:

1. PEAK TIME DEMAND GENERATION (hot summer mid-days when the solar units are most productive.)
2. NEW TRANSMISSION LINE INSTALLATIONS NEEDED (energy is delivered directly to use below the roofs)
3. VULNERABILITY TO PRICE MANIPULATION (not on individual solar)
4. AIR QUALITY (no pollution)

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5. RELIABILITY (very little maintenance)
6. INDEPENDENCE FROM FOREIGN OIL
7. SAFETY FROM TERRORIST ATTACKS

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Submitted for CREED Coalition for Responsible and Ethical Environmental Decisions, by  
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Part 14 CREED COMMENTS San Onofre EIR

SAN ONOFRE – Another environmental impact study must be made before an approval for the regeneration or continued life of any or all of the nuclear reactor units at the San Onofre power plant. Additionally, a health study should be required not only for the workers at San Onofre but on the populations located nearest to the San Onofre nuclear facility.

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I truly doubt EDISON will be able to meet the quality and/or health standards necessary for governmental approval. Further, there will be environmental justice concerns to consider as well.

This time the impact study must look at the fact that within a mile from San Onofre, the military has set up a residential community for the spouses and families of service men and women serving overseas, most in Iraq. These families had no choice in where they live because of the economic constraints under which they live. They are by and in large, considered a low-income community. Living within one mile from the nuclear reactors and the above-ground irradiated toxic waste and nuclear stockpiles, exposes these families to the highest risk of danger from any possible accident and/or terrorist attack. The coastal winds, even on the calmest of days, would almost certainly carry the toxic pollution more than a mile. They are the most vulnerable population and more disproportionately at risk of being the first victims of a nuclear accident or terrorist attack.

CC6-24

The EPA must now consider the impact on low-income communities when granting any permission to Edison efforts to revive the aged nuclear reactors at San Onofre for an additional 10 years or more.

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The following statement was taken from the EPA's Office of Environmental Justice website:

“Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations and policies. *Fair Treatment* means that no group of people should bear a disproportional share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.”

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This concept of environmental justice came about because it became increasingly clear that the EPA was unfairly applying its enforcement inspections and that environmental risk was higher in racial minority and low-income populations. In 1994 President Clinton issued Executive Order 12898, “*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* in attempt to address environmental injustice within existing federal laws and regulations.

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The EPA must now consider and address environmental justice concerns which encompass its activities including “setting standards, permitting facilities, making grants, issuing licenses or regulations, and reviewing proposed actions of *other federal agencies.*” *Id.*

**CC6-26**

Edison will have to prove that its operations of San Onofre will not disproportionately impact on racial, ethnic or economic minorities. But will not be able to do so because even Homeland Security has deemed our nuclear power plants to be vastly unprotected terrorist targets, despite Edison’s position to the contrary.

Additionally, if San Onofre’s reactors are allowed to regenerate for another 10 years which undoubtedly would be extended even beyond that date, the amount of nuclear waste will increase, and as of this date, there has been no effective long-term disposal program or waste facility, except for suggested sites that also target under represented minority communities. (*see* The Commission for Racial Justice’s landmark *Toxic Wastes and Race* study regarding race and income factors in determining locations for toxic waste sites) The United States must put more effort into developing safe, clean and renewable resources of energy because it will soon be discovered that there will be no safe place to deposit the hundreds of tons of nuclear waste that the nuclear power plants are generating.

**CC6-27**

Lastly, with respect to safeguarding the many communities surrounding San Onofre, it must be remembered that since the inception of that nuclear power plant, the populations of the closest surrounding communities, including San Clemente, San Juan Capistrano, Dana Point, Mission Viejo, Aliso Creek, Laguna Niguel have more than quadrupled. While true, these communities are not low income or minority, many were expanded with the knowledge that the nuclear power plants were going to be phased out during the early 2000s. They also grew before 9/11 and the real danger of terrorist attacks on U.S. soil.

Any effort by Edison and the various governmental agencies involved in the approval process to extend the life of these failing nuclear reactors at San Onofre only increase the potential for catastrophic loss of human life.

The next 6 to 7 years when Reactors II and III are phased out will provide California and the energy agencies and industries opportunity to develop clean, safe and renewable energy sources such as solar, wind, tidal, current to provide future generations of safe and clean energy technologies.

Submitted by:

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**Comment Set CC6, cont.**  
**CREED**

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**Comment Set CC6, cont.**  
**CREED**

San Onofre c/o Andrew Barnsdale, Project Director

**OVERTIME---NO CHARGE CREED ADDENDA**  
**SIGNIFICANT? Insignificant?**

**PART 15**

Aspen Staff: You are like some kind of God delegates, holding in your hands the power to obliterate earthly honors and evaporate dreams of beautiful memorials.

Twenty years ago, the old highway, that fronts San Onofre, ran three miles south of the nuclear kingdom through treeless and semi-barren bluff-top camp ground and day-use State Park land.

Today, mature pine trees soften the vacation experience, providing spots of shade and visual pleasure. See Draft Environmental Impact Report D 4-13 and adjacent photos.

Whose trees are these who gently greet the breeze from San Onofre?

Listen, and you cannot hear their names; search, and you cannot find their names, but the names of those grand trees are written in the memories of those who were honored as citizens of achievement of the Capistrano Bay area, and some are written in the hearts of widows in memory of their beloved departed husbands.,

All this, in a program that reached 20 years of age this year--- Soroptimist International of Capistrano Bay's Trees of Honor---trees recognizing citizens of honor throughout the Capistrano Bay communities.

Five or six years from now, some of these may be uprooted, perhaps replanted, perhaps not, to provide a street width through which the giant steam generators from San Onofre may be transported.

Whether it be "may" or whether it be "will," is the whim of mighty Aspen staff, by whom the mark of "significant" or "insignificant" may be a mark of doom.

**CC6-28**

**Comment Set CC6, cont.**  
**CREED**

And who among the town-folks of the village San Clemente have wrought this honor of the trees, these old-folk memories, this dream of shady green ? Who do you say? Why, the jolly Soroptimists, ladies of Capistrano Bay.

JERRY COLLAMER CREED Liaison to 'Save San Onofre Beach'  
Duckdive1@cox.net

**CC6-28**

## **Responses to Comment Set CC6**

### **CREED**

CC6-1 The purpose of this EIR is to evaluate potential environmental impacts that have the potential to result from the Proposed Project, which consists of the replacement of the SONGS steam generators. The EIR has not evaluated, nor is it required to evaluate, the ongoing operations at SONGS since those operations constitute existing baseline conditions. See Master Response MR-1 (Baseline). The impacts to terrestrial and marine biological resources from the Proposed Project, the Alternatives and the No Project Alternative are adequately analyzed and presented in Sections D.3.3, D.3.4, and D.3.5, respectively, of the Draft EIR. The use of renewable energy as a replacement power generation source necessitated by a potential shutdown of SONGS would be a consequence of the No Project Alternative, and as such, this is described in Section C.6.3 and in specific each issue area section addressing the No Project Alternative in Section D of the Draft EIR.

The comment suggests operation could occur under a 20-year extension of the NRC licenses, but license renewal is not a reasonably foreseeable consequence of the proposed Steam Generator Replacement Project. Please see Master Response MR-2 (License Renewal) and Response CC3-1 for information regarding license renewal and why the EIR is not required to evaluate the impacts of potential relicensing of SONGS.

CC6-2 The Proposed Project would not involve Unit 1 at SONGS, and the proposed containment structure modifications would not be similar to those historically required at Unit 1. Unit 1 required modifications to its containment structure because it had been previously designed to less stringent safety measures. No similar changes would be necessary for Units 2 or 3. The ongoing decommissioning of Unit 1 is identified as a baseline and cumulative activity that would occur simultaneously with the proposed steam generator replacement activities at Units 2 and 3. The Proposed Project consists of replacing vital components within Units 2 and 3. It would not involve changing the units for the purpose of meeting changing standards.

CC6-3 The comment presents information regarding the support being given to SDG&E for their efforts to replace fossil fuel and nuclear energy generation sources with renewable and distributed generation (DG) sources. In addition, it is noted that the commenter supports a transition to the use of these sources, as well as fuel efficiency and conservation, to supply electricity in southern California. These comments do not require a response.

The commenter requests that a combination of these alternative energy sources, with preference for solar power, be selected as the Environmentally Superior Alternative for the Proposed Project. It is important to note that the Proposed Project is steam generator replacement, and alternative energy resources are not true alternatives to the Proposed Project, as suggested by the comment. Alternative energy sources are relevant only as part of replacement generation scenarios under the No Project Alternative. It would be unduly remote and speculative to forecast exactly how any replacement power would be provided given the wide range of possibilities, including type, size, or location. Therefore, a detailed analysis of specific projects would not be possible or meaningful. Executive Summary Section 4.3 and Section E.3 of the Draft EIR compare the No Project Alternative to the Environmentally Superior Alternative. Based on this full evaluation and weighing *all* issue areas, the No Project Alternative was *not* found to be overall environmentally superior to the Proposed Project. The Environmentally Superior Alternative is the Proposed Project with the

MCBCP Inland Route Alternative. Please also see Response CC2-1 for more information regarding the scope of the No Project Alternative analysis.

- CC6-4 Draft EIR Section D.3.1.5 described the ongoing effects of the SONGS cooling water system on the marine environment. Ongoing SONGS cooling water system operation causes thermal plume impacts and impingement/entrainment of marine organisms that are part of the environmental baseline as clearly described in Section D.1.2.1. These impacts would continue to occur in the baseline with continued SONGS operations through the end of the license term in 2022. Also as noted in Section D.3.5.2 of the Draft EIR, under the No Project Alternative, impingement and entrainment would cease and cooling water thermal discharges would no longer occur, thus avoiding the effects that are currently attributed to SONGS Unit 2 and 3 operations. Cessation of the SONGS cooling water system operations would also allow for the gradual restoration of the marine environment as it existed prior to SONGS operations. In this regard, the No Project Alternative would produce beneficial environmental impacts.
- CC6-5 The cooling water system and its effects on the marine environment are aspects of the existing environmental conditions that would be unaffected by the Proposed Project. See Master Response MR-1 (Baseline) and Response CC6-4. "Chemical/toxic waste streams" that are contained in the SONGS cooling water discharge have been found to meet all applicable discharges defined by the Clean Water Act (CWA) and the California Ocean Plan. Monitoring data has not identified any impacts associated with SONGS discharges that have led to increase chemical loading in marine organisms. As noted in Response CC6-4 above, the major issues associated with the SONGS cooling water system is related to thermal discharges and the impingement/entrainment of marine organisms.
- CC6-6 Potential hazards associated with risk of terrorist attacks at SONGS were discussed in Section D.12.1 of the Draft EIR. Since SONGS is an operating power plant, terrorism risks are considered to be part of the CEQA baseline. Please see Master Response MR-1 (Baseline). The Proposed Project would cause no significant change to the existing terrorist risk posed by the current plant (see also Impact S-5, regarding terrorist risks). In evaluating alternatives to the Proposed Project, the Draft EIR did find that there would be a beneficial impact, and a much lower probability of terrorist attack, if SONGS were to cease operations (see Section D.12.5). However, the risk of a terrorist attack on the SONGS ISFSI would still exist since there are no offsite storage or disposal locations for SONGS spent fuel. Therefore, the risk of a terrorist attack on SONGS spent fuel facilities will continue for the foreseeable future regardless of the outcome of the Steam Generator Replacement Project. Please also refer to Response 18-1 regarding the risk of terrorism at SONGS.
- CC6-7 As stated in Draft EIR Section D.1.2.1, the operation of SONGS under its current licenses (set to expire in 2022) is considered part of the environmental setting (i.e., the baseline), and is not subject to review as part of this EIR process. See also Master Response MR-1 (Baseline). The Proposed Project would not change SONGS operations in any manner that would affect fire protection or emergency response. Therefore, no further analysis or mitigation is required, since these issues constitute a baseline condition, not a potential impact of the Proposed Project. As stated in Section D.10.2 of the Draft EIR, SONGS' existing emergency response and safety plans are governed by NRC regulations (10 CFR 50, Appendix E), which establish minimum requirements for emergency plans for use in attaining an acceptable state of emergency preparedness. These plans are reviewed and

approved by the Federal Emergency Management Agency (FEMA) and the NRC. See also Master Response MR-3 (Jurisdiction).

CC6-8 It is noted that the commenter supplied contact and reference information regarding testimony presented on recent seismic data that is available from the California Coastal Commission.

CC6-9 Please see Response CC6-7 above.

CC6-10 Potential traffic impacts associated with operation of the plant through 2022 are part of the environmental baseline and not impacts of the Proposed RSG Project. As stated in Section A of the Draft EIR, the purpose of this EIR is to evaluate the potential environmental impacts expected to result from the Proposed Project, which is the replacement of steam generators in SONGS Units 2 and 3. The scope of this EIR, as defined by CEQA, focuses only on changes to physical conditions affected by the Steam Generator Replacement Project, and describing the significant environmental effects of the project. The operation of SONGS past 2022 would require approval of a license renewal from the NRC. CEQA does not require an evaluation of a potential renewal of the SONGS 2 & 3 operating licenses because relicensing is not a reasonably foreseeable consequence of the Proposed Project. Please also see Master Response MR-2 (License Renewal).

The remainder of the comment presents information on baseline traffic conditions near the project area, which are documented in Section D.13.1 of the Draft EIR. This information is merely a summary of the project setting and, therefore, does not require a response.

CC6-11 The Draft EIR recognizes the potential dangers of restricting access along Interstate 5 (I-5), identifying potentially significant impacts associated with this in both Section D.10, Public Services and Utilities (Impact U-2, Proposed Project would disrupt public service systems) and Section D.13, Traffic and Circulation (Impact T-1, Transport of RSGs would result in public road closures and cause traffic delays). Mitigation Measures U-2a (Maintain adequate emergency vehicle access) and T-1a (Provide emergency vehicle access) have been designed to ensure continuous emergency access along I-5 during transportation activities and would reduce any impacts to less than significant levels.

As required by CEQA, the analysis performed for this EIR is limited to the examination of how the Proposed Project would alter the environment from baseline conditions. The Proposed Project does not alter the route of I-5, nor does it propose to build permanent new structures associated with SONGS any closer to I-5. Consequently, the location of I-5 in relation to SONGS and the potential safety risks of ongoing SONGS operations are considered to be part of the baseline conditions that would not be altered by the Proposed Project. Please also see Master Response MR-1 (Baseline) for a discussion of the environmental setting against which the environmental analyses are measured.

Please see Master Response MR-2 (License Renewal) for a discussion of the potential relicensing of the SONGS facility and its relation to the Proposed Project.

CC6-12 The baseline traffic conditions that are noted by the comment are identified in Sections D.10.3.2 and D.13.1 of the Draft EIR. To avoid disruption and inconvenience of commuters, tourists, truck traffic, and emergency vehicles, transport activities on I-5 would not occur during peak hours. This would be ensured by the oversight of Caltrans and Caltrans approval of the transport activities. Mitigation Measure U-2a (Maintain adequate emergency vehicle

access) would require establishing a means for adequate emergency vehicle access during transport. Other measures, such as Mitigation Measures T-1a (Provide emergency vehicle access), T-3a (Schedule SONGS shift changes outside of peak hours), and T-5a (Schedule material deliveries outside of peak hours), are identified in the EIR where needed to similarly avoid significant impacts to I-5. In addition, Draft EIR Section D.13.3.2 clarifies that SCE, as directed by Caltrans, would conduct transport on I-5 during non-peak hours, most likely at night, to reduce traffic delays. Section D.13.3.1 presents applicant-proposed mitigation (APMs), including Traffic-1 (Submission and approval of a detailed traffic control plan), Traffic-3 (Use of necessary cones, barricades, signs, and additional warning devices), and Traffic-4 (Use of trained workers to direct traffic and other necessary equipment), which would control or avoid traffic delays caused by the project on I-5.

CC6-13 The two campgrounds that are located at San Onofre State Beach are discussed in detail in Draft EIR Section D.8.1. The San Mateo Campground, which is located northwest of the Proposed Project, would not be affected by the Proposed Project activities and can accommodate a maximum of 1,256 campers (221 campsites with a maximum of eight per site). The Bluffs Campground is located southeast of the Proposed Project, and use of this campground may be temporarily precluded for several days during transport of the RSGs, as described in the analysis of Impact L-1 (Transport would disrupt an established land use). As the Bluffs Campground is typically closed from December 1 through March, and RSG transport would occur between the months of October and February, the extent to which impacts may occur to recreational users at the Bluffs Campground would depend upon the schedule for RSG transport. Overall, the Draft EIR considered impacts to recreational users to be potentially significant (see Draft EIR Section D.8.3.2), and introduced the following mitigation measures to reduce impacts to less than significant levels: Mitigation Measures L-2a (Avoid peak recreational usage), N-1a (Provide advance notice of transport), V-1a (Request decision on closure of San Onofre State Beach) and V-1b (Provide advance notice of campground closure to prospective park visitors and campers).

Beach access would not be restricted within San Onofre State Beach during transport of the RSGs. As discussed in Draft EIR Section B.3.2.1, Beach and Road Route, Segments H through J, flagmen would be used to direct park traffic around the transporter to allow for continued use of the park.

As discussed in Draft EIR Section D.1.2.1, pursuant to CEQA Guidelines Section 15125(a), the environmental setting used to determine the impacts associated with the Proposed Project and alternatives is based on the environmental conditions that existed in the project area in October 2004, at the time of publication of the Notice of Preparation. This baseline includes the existence of the operating nuclear power plant. It is acknowledged that the 84-acre SONGS site had been the subject of State and local recreational planning efforts. However, as stated in Draft EIR Section D.1.2.1, the operation of SONGS under its current licenses (set to expire in 2022) is considered part of the environmental setting (i.e., the baseline), and is not subject to review as part of this EIR process. The Proposed Project would not change SONGS operations in any manner that would affect the long-term recreation planning referred to by the commenter. The No Project Alternative examines the impacts associated with cessation of plant operations if the Proposed Project were not to be approved. The Final EIR includes a clarification in Section D.8.5 to note that No Project Alternative may lead to an increased amount of land being accessible for recreation use, depending on how the facility were ultimately to be decommissioned. Please also refer to Master Response MR-1 (Baseline).

The Proposed Project is not a “nuclear rebuilding/extension” project as suggested by the comment. The Proposed Project is the replacement of the steam generators at SONGS Units 2 and 3. The operation of SONGS beyond 2022 is not a reasonably foreseeable consequence of the Proposed Project, and, therefore, the EIR does not evaluate it. Please see also Master Response MR-2 (License Renewal).

- CC6-14 The ongoing production and storage of hazardous mixed waste and radioactive materials, including spent fuel, are activities that occur in the environmental baseline (Draft EIR Section D.1.2.1). The ongoing operation of SONGS through its current licensed terms and waste storage on the project site has already been evaluated and approved by the NRC. The baseline risks of spent fuel storage are discussed in Section D.12.1. The location of SONGS near populated areas and in a region of seismic activity are similarly aspects of the baseline and would not be changed or affected by the Proposed Project. Waste storage issues beyond 2022 would be subject to the sole jurisdiction and review of the NRC in the event of relicensing. Please see Master Response MR-3 (Jurisdiction). The Proposed Project activities (RSG transport, staging and preparation, etc.) would not result in changes to spent fuel waste production. The extent that the No Project Alternative could beneficially reduce the baseline risks associated with spent fuel handling is described in Section D.12.5 of the Draft EIR. Hazardous materials impacts caused by the Proposed Project are analyzed in Section D.6 of the Draft EIR. See also Master Responses MR-1 (Baseline) and MR-2 (License Renewal).
- CC6-15 Please see Response CC5-38.
- CC6-16 Please see Responses CC6-6 and CC6-7. Following the Unit 3 fire on February 3, 2001, the NRC evaluated the SONGS fire safety systems and procedures. Following this review and recommended changes, the NRC determined that the fire systems and procedures at SONGS met NRC requirements. As stated in Section D.1.2.5 of the Draft EIR, nuclear power plant safety is under the sole jurisdiction of the NRC. Please also see Master Response MR-3 (Jurisdiction).
- CC6-17 The comment does not reference the Proposed Project or SONGS. However, the commenter appears to suggest that nuclear power plants need to have effective fire prevention and response procedures. Please also see Response CC6-16, above, and Responses CC6-6 and CC6-7.
- CC6-18 The issues of exclusion areas described in the comment are part of the existing baseline for the Steam Generator Replacement Project EIR. The purpose of the Proposed Project EIR is to evaluate potential impacts associated with the Proposed Project and not past issues. The exclusion area is part of the existing baseline that would not be changed by the Proposed Project. Please also see Master Responses MR-1 (Baseline) and MR-3 (Jurisdiction).
- CC6-19 The comment does not identify any issue or requested action associated with the Proposed Project or the Draft EIR. See Section D.12.1 for a discussion of SONGS terrorism and security issues.
- CC6-20 Please see Responses CC2-1 and CC2-2 for reasons why specific scenarios or projects are not analyzed in detail under the No Project Alternative. As the comment notes, costs are considered as part of the CPUC general proceeding. The EIR does not address cost or ratepayer benefit in the evaluation of the Proposed Project or alternatives because the focus of CEQA is limited to the physical changes to the environment. Please see Master Responses MR-1 (Baseline) and MR-2 (License Renewal) regarding the scope of the EIR and the potential for the continuation of SONGS’ operation and analysis of impacts past 2022.

CC6-21 The distribution of potassium iodide (KI) to the surrounding community is beyond the scope of the EIR. Draft EIR Section D.12.1 did identify potential baseline impacts associated with SONGS operations, as well as potentially beneficial impacts of the No Project Alternative if the Proposed Project is not approved.

CC6-22 It is noted that the commenter supports the No Project Alternative, especially with the use of solar power. Please refer to Sections C.6.3.1 and C.6.3.2 of the Draft EIR for a discussion of solar energy technologies. Responses CC2-1 and CC2-2 also provide more information regarding the approach used for the No Project Alternative. Among other environmental effects, the intermittent nature of solar power makes solar thermal and photovoltaic systems unsuitable for base-load applications. In addition, there is no way to guarantee that a sufficient amount of solar generation capacity is installed in a timely manner. Neither SCE nor the CPUC have authority to require the installation of solar panels on military or private rooftops, therefore their installation is uncertain. Therefore solar technologies are an important energy source, but because of their intermittent nature, they are not considered a sole replacement for SONGS. Please also see Responses CC2-5 and CC2-6 regarding the suggestion to consider rooftop solar generation and the Million Solar Roofs initiative.

The second portion of the comment presents a summary of the advantages of distributed generation. This does not require a response because the use of DG would not be precluded by the No Project Alternative. Response CC5-12 also addresses the use of DG.

CC6-23 The Proposed Project would not involve the nuclear reactors at SONGS 2 & 3. The existence of the nuclear power plant through the NRC-authorized license period and its ongoing effects on worker or public safety are not a consequence of the Proposed Project, but rather are aspects of the environmental baseline (Section D.1.2.1 of the Draft EIR). Please also see Master Response MR-1 (Baseline). Draft EIR Section D.12.1 describes the baseline conditions for the existing power plant and consist of a variety of existing safety-related conditions associated with the operation of the DCP, including: emergency planning, reactor risk, spent fuel, low level radio active waste, security and terrorism. The analysis for whether the Proposed Project would expose workers and the general population to radiation exposure is included in Section D.12.3 of the Draft EIR (System and Transportation Safety), which identifies no potentially significant impacts that could not be mitigated with identified measures. The Draft EIR evaluated potential impacts to workers resulting from residual contamination that could be present on the OSGs. OSG removal and transport would be conducted as per NRC requirements (Draft EIR Section B.3.4). The impact of potential radiation exposures during OSG removal and transport is described in Impact S-3, Section D.12.3.4 of the Draft EIR, and was found to be less than significant. Additional discussion of radiation-related risks to workers would be beyond the scope of the EIR because it would relate to nuclear materials handling and storage. These activities are exclusively regulated by the NRC (Draft EIR Section A.4.1). See also Master Response MR-3 (Jurisdiction).

CC6-24 The nearest military housing is about 6,500 feet from the units, greater than one mile away. Existing studies have shown that the risk to the public outside of the SONGS facility is lower than applicable significance thresholds. Routine emissions of radioactive materials have not exceeded quantities that would result in a significant health risk. Since SONGS operations are part of the EIR baseline, the Proposed Project is not expected to add any additional risk to the surrounding population. Please also see Master Response MR-1 (Baseline).

- CC6-25 As stated in Draft EIR Section D.1.2.1, currently SCE is not proposing to extend the life of SONGS beyond the current license periods. Should SCE propose to relicense SONGS for another 20 years, additional environmental review would be required, including an evaluation of potential public health impacts and environmental justice. Such an analysis would be conducted under the National Environmental Policy Act (NEPA) with the NRC as the lead agency. The need for this review is identified in Section G of the Draft EIR. Please also refer to Master Responses MR-2 (License Renewal) and MR-3 (Jurisdiction).
- CC6-26 CREED is correct in assuming that environmental analysis for federal actions must include an analysis of the environmental justice impacts under NEPA. The Proposed Project, however, is under the jurisdiction of the CPUC, not the NRC, and as such is analyzed for impacts under CEQA, which does not require an analysis of environmental justice impacts or have significant criteria for assessing environmental justice issues. The effects of the Proposed Project related to housing and labor demand or population and housing displacement are described in Section D.11.3 (Socioeconomics).
- CC6-27 Master Response MR-1 (Baseline) provides information on the ongoing operation of SONGS, which includes the risk of sabotage or terrorism (Draft EIR Section D.12.1). The Proposed Project would not adversely impact the risk of terrorist attack or production of fuel waste. The ongoing production of spent fuel waste is an activity that occurs in the environmental baseline (Draft EIR Section D.1.2.1), and this activity has already been evaluated and approved by the NRC through the time period of the existing licenses. Please also see Master Response MR-2 (License Renewal) for a discussion as to why the potential relicensing of SONGS, which is still in the preliminary feasibility and planning stages does not constitute a reasonably foreseeable consequence of the Proposed Project, and, thus, need not be analyzed in the EIR. Section G.4 of the Final EIR illustrates the issues relevant to license renewal, including the ongoing risk of terrorism.
- CC6-28 This EIR does not make a recommendation as to whether SCE's application should be approved or denied, but rather is purely informational in content. This EIR will ultimately be used by the CPUC decision-makers in considering whether or not to approve the project as proposed or an alternative.

The comment only indirectly identifies an issue, the potential removal of trees, that is associated with the Proposed Project. It is not anticipated that any trees would need to be removed in order to transport the RSGs from the Del Mar Boat Basin at MCBCP to SONGS in the proposed Beach and Road Route or the alternatives. Transport would occur on sand or paved or dirt roads. There are a few transition points where transport could cause temporary impacts to annual grassland and ruderal habitat (see Impact B-1 and Impact B-8). Further, if vehicles were to travel beyond the limits of the proposed travel routes, native vegetation may be impacted (see Impact B-2 and B-7). All such potential impacts to sensitive plant species would be mitigated to a less than significant level (e.g., through Mitigation Measures B-1a and B-8a, regarding plant surveys and the need for revegetation, respectively).