

CEQA Guidelines (Section 15355) define cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual impacts may be changes resulting from a single project or several separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects occurring over a period.

Additionally, CEQA Guidelines (Section 15130) require a discussion of project cumulative impacts when the projects incremental impact is cumulatively considerable, as defined in Section 15065(c). When a project has an incremental impact that is not “cumulatively considerable” the impact is not necessarily considered significant, but a brief discussion that describes the basis for concluding that the incremental impact is not cumulatively considerable, is required.

The activities associated with the proposed replacement of the SONGS 2 & 3 steam generators are temporary in nature. No potential adverse impacts on the environment have been identified with the replacement of the original steam generators with the RSGs at the staging areas at SONGS 2 & 3. Steam generator replacement activities, excluding the transport options, will require up to approximately 1,000 temporary employees. RFO activities, which will occur at the same time, but are not part of the Proposed Project, will require an additional 1,000 temporary employees. Available housing on the Mesa side of SONGS 2 & 3 and off-site parking areas and shuttle bus service, if necessary, will reduce potential, temporary impacts, on transportation, traffic, and parking associated with this number of temporary employees.

Although not specifically part of this project, an Integrated Leak Rate Test (ILRT) will be conducted, as described in Section 3.0, after the containment structure has been sealed at the completion of the RSG installation. The ILRT is a routine NRC license requirement that is to be done on an approximate ten-year frequency. Regardless of the steam generator replacement activity, the ILRT will be conducted. The last ILRT was conducted in 1995. The next routine ILRT will be due during an RFO closest to 2005. However, this test date, with the concurrence of the NRC, will be extended to the Cycle 16 RFO. Such an extension is not expected to be withheld by the NRC.

In the 1995 ILRT, a maximum of eight 440 HP 1,500 cfm diesel driven air compressors were operated to pressurize the reactor containment structure for a specified period of time. These machines operated between approximately 16 to 18 hours during each of the sequential SONGS 2 & 3 ILRT. The 1995 ILRT was permitted under local San Diego County Air Pollution Control District requirements and was demonstrated to not cause a significant impact. Although the same type of diesel driven air compressors may not be used during the Cycle 16 RFO testing, equivalent machines are expected to be used with similar ratings and emission characteristics. Appropriate permits for the ILRT will be obtained prior to the Cycle 16 RFO with the corresponding demonstrations that there will be no adverse impact. Based on review of 1995 ILRT, no significant adverse cumulative effects are expected to occur.

The impacts of transport for the RSGs along the Beach and Road Route will not result in adverse environmental impacts. The Inland Transport Options have the potential to create significant adverse temporary impacts on traffic along I-5; however, mitigation measures are available to reduce these potential adverse impacts to insignificant levels. These impacts do not have a potential to add to the impacts of other projects and no cumulative impacts are expected to result from the Project.