

CALIFORNIA COASTAL COMMISSION

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Th3a

Staff Memo – Special Condition 7, CDP 9-15-0228

Ex Parte

Updated July 15, 2020

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Roberto Uranga

- 1) Name or description of project: CDP # 9-15-0228
- 2) Date and time of receipt of communication: July 6, 2020 at 1:30pm
- 3) Location of communication: Telephone
(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)
- 4) Identity of person(s) initiating communication:
Dave Neish
- 5) Identity of person(s) on whose behalf communication was made:
Applicant
- 6) Identity of persons(s) receiving communication:
Roberto Uranga
- 7) Identity of all person(s) present during the communication:
Roberto Uranga, Dave Neish, Celina Luna

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

I had a phone conversation with David Neish, on behalf of the applicant who provided a brief history on the project. He explained that the CDP application was approved by the Commission in 2015, which authorized construction of an ISFSI to store nuclear fuel for SONGS Units 2 and 3. The Commission required that Edison submit an Inspection Maintenance Program (IMP) for Commission review and approval. The IMP required Edison to describe the cask inspection, monitoring and maintenance techniques, as well as potential canister remediation measures if necessary that would be implemented. In addition the Commission required Edison to fund an independent 3rd party review of the IMP.

The consulting firm LPI reviewed the IMP provided by Edison and in addition to the supporting documentation requested four additional recommendations. Edison has agreed to these additional recommendations which are now incorporated into the IMP. The IMP now contains the required measures in Special Condition 7 of CDP 9-15-0228. As a result CCC Staff is recommending that the IMP is consistent with the requirements of Condition #7 and is recommending Commission approval.

07/06/2020



Date

Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Steve Padilla

- 1) Name or description of project: July 2020 Condition Compliance for Permit No. 9-15-0228 (Southern California Edison, San Diego Co). Condition Compliance for Permit No. 9-15-0228 (Southern California Edison, San Diego Co).
- 2) Date and time of receipt of communication: 7/15/2020, 10am
- 3) Location of communication: Telephone
(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)
- 4) Identity of person(s) initiating communication: Dave Neish
- 5) Identity of person(s) on whose behalf communication was made: Southern California Edison
- 6) Identity of persons(s) receiving communication: Commissioner Padilla
- 7) Identity of all person(s) present during the communication: Dave Neish, Commissioner Padilla

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

The applicant's representative explained that the CDP application was approved by the Commission in 2015, which authorized construction of an ISFSI to store nuclear fuel for SONGS Units 2 and 3. Moreover, he explained that the Commission required that Edison submit an Inspection Maintenance Program (IMP) for Commission review and approval. This IMP required Edison to describe the cask inspection, monitoring and maintenance techniques, as well as potential canister remediation measures if necessary, that would be implemented. Additionally, the Commission required Edison to fund an independent 3rd party review of the IMP.

Mr. Neish indicated that the engineering consulting firm LPI reviewed the IMP provided by Edison and the supporting documentation which requested four additional recommendations. He asserted that Edison has agreed to these additional recommendations which are now incorporated into the IMP. He indicated that the IMP now contains the required measures in Special Condition 7 of CDP 9-15-0228. As a result, CCC Staff is recommending that the IMP is consistent with the requirements of Condition Number 7 and is recommending Commission approval.

7/15/2020
Date



Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.