

# SONGS

## 2020 Decommissioning Progress Report

June 15, 2021



SOUTHERN CALIFORNIA  
**EDISON**<sup>®</sup>

Submitted in compliance with Special Condition 3 of the 2019 SONGS Units 2 and 3 Onshore  
Decommissioning CDP (CDP 9-19-0194)

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## List of Acronyms

ACM	Asbestos Containing Material
APM	Applicant Proposed Measures
CAB	Controlled Area Boundary
CACA	Corrective Action Consent Agreement
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CSLC	California State Lands Commission
D&D	Decontamination & Dismantlement
DoN	U.S. Department of the Navy
DTSC	California Department of Toxic Substances Control
EAB	Exclusion Area Boundary
EIR	Environmental Impact Report
FEIR	Final Environmental Impact Report
IMP	Inspection and Maintenance Program
ISFSI	Independent Spent Fuel Storage Installation
IRMS	ISFSI Radiation Monitoring System
MM	Mitigation Measure
MMP	Mitigation Monitoring Program
NRC	U.S. Nuclear Regulatory Commission
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
RCRA	Resource Conservation and Recovery Act
RPV1	Unit 1 Reactor Pressure Vessel
RVI	Reactor Pressure Vessel Internals
SC	Special Condition
SCE	Southern California Edison Company
SDG&E	San Diego Gas and Electric
SONGS	San Onofre Nuclear Generating Station
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USFWS	United States Fish and Wildlife Service
WDID	Wastewater Discharge Identification Number

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# 1 Introduction

Southern California Edison Company (SCE), on behalf of itself and its decommissioning co-participants San Diego Gas & Electric, the City of Riverside, and the City of Anaheim, provides this 2020 Annual Progress Report (the Report) for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Onshore Decommissioning Project (the Project) in compliance with Special Condition 3 of the California Coastal Commission's (CCC) 2019 Coastal Development Permit (CDP) for the Project (the 2019 Onshore Decommissioning CDP), CDP 9-19-0194.

The Project is located on lands owned by the U.S. Department of the Navy (DoN) and operated as Marine Corps Base Camp Pendleton in San Diego County. Project work includes the decontamination and dismantlement of most above-grade structures at SONGS.

Special Condition 3 of the 2019 Onshore Decommissioning CDP states that SCE shall provide the CCC's Executive Director with annual progress reports by June 15 of each year, and that the reports shall include the following:

- a. A description of progress made in the previous year in conducting the Project;
- b. Results of any Final Status Surveys;
- c. Identification of any changes to the Project resulting from Final Status Surveys (e.g., identification of areas where additional structures or materials are required to be removed beyond that which is described in the FEIR for the Project), including the volume(s) of material proposed to be removed and/or placed as backfill, method(s) of decommissioning and disposal, and identification of SONGS structures that would be proposed to remain following the identified change to the Project;
- d. Updates regarding the opportunities for long-term storage and/or disposal of nuclear waste, including specific discussion of potential opportunities to relocate waste currently stored in the Independent Spent Fuel Storage Installation (ISFSI) either elsewhere on the SONGS site or at offsite locations;
- e. Interactions with the NRC regarding potential or proposed changes to the Exclusion Area;
- f. Any changes to project schedule that occurred or are anticipated in the subsequent year; and
- g. Assessment of the need for an amendment to this permit.

This Report provides information identified in categories "a" through "g" quoted above.

This Report describes progress made in 2020 once decommissioning work commenced February 24, 2020. The 2020 activities generally consisted of continued site preparatory activities in anticipation of the commencement of demolition work as well as mitigation measure and permit conditions submittals, monitoring, and compliance.

This Report provides an update on topics such as SCE's efforts to relocate spent nuclear fuel offsite, the proposed future changes to the SONGS Exclusion Area Boundary (EAB), and anticipated schedule activity milestones for 2021. As described in more detail below, no Final Status Surveys were performed, no changes to the Project are recommended, and no CDP amendment is required.

## 2 2020 Annual Progress Report

SCE's 2020 progress regarding the items identified in Special Condition 3 is set forth below.

### a. Site Preparation for Demolition Activities and Mitigation Measure and Permit Compliance, Monitoring, and Reporting

On January 22, 2020, a 30-day advance notice advising of SCE's intent to commence deconstruction activities was mailed to stakeholders and members of the public within 5-miles of SONGS. While the Plant continued to safely complete all fuel transfer operations in 2020, the following milestones were achieved as Decontamination & Dismantlement (D&D) was effectively and safely initiated.

#### i. Site Preparation for Demolition Activities

The first activity to signify the official start of D&D was the removal of friable asbestos cables within the Units 2 & 3 Containment Buildings. During the first quarter of 2020, additional activities within the site's containment area included Asbestos Containing Material (ACM) abatement needed as a precursor for the removal of the reactor pressure internal (RVI) components, as well as ACM cable removal and cleaning within the Radiological Waste (Rad Waste), Control and Unit 2 Penetration Buildings. Office trailer setup needed for site personnel continued in Parking Lot 4. On the north side of the plant, rail spur upgrades were installed to allow for transportation of the Unit 1 reactor pressure vessel (RPV1) offsite to Clive, Utah for disposal. Please see *Appendix A: First Quarter 2020 Photographs*.

As a response to severe acute respiratory syndrome coronavirus 2 (SARS-COV-2/COVID-19), a pandemic protocol was implemented and managed on-site and remained in effect.

During the second quarter of 2020, loose and friable ACM remediation was completed within both Units 2 and 3 Containment buildings. Remediation continued in other impacted areas of the Plant. A custom-made Schnabel rail car was brought on site and loaded with the RPV1 for its delivery to Clive, Utah. Please see *Appendix B: Second Quarter 2020 Photographs*.

Third quarter milestones included delivery of RPV1 to Clive, Utah, and the completion of spent nuclear fuel transfer to dry storage. Installation of the office trailer complex was completed with employee occupation in fourth quarter. As containment demolition preparation activities continued, detensioning of the Containment Building tendons (the internal skeleton of the domes) began and the decommissioning contractor began waste shipments out-of-state for disposal. Please see *Appendix C: Third Quarter 2020 Photographs*.

The last quarter of 2020 saw limited work continuing under the COVID-19 protocols. The site entered a Corrective Action Consent Agreement (CACA) with the California Department of Toxic Substances Control (DTSC) for non-radiological soil and groundwater investigation needed to close out the SONGS Resource Conservation and Recovery Act (RCRA) permit. Key deliverables to the DTSC for the CACA were developed and submitted with comments received, resolved, and incorporated for final approval. The Unit 3 generator rotor was removed and transported offsite, and waste shipments continued out-of-state. As 2020 drew to a close, the main demolition contractor for certain buildings was mobilized on-site to begin removal of universal waste (i.e., fluorescent bulbs, batteries and thermostats) and ACM to support demolition activities planned for 2021. Project personnel de-mobilized mid-December for the

holidays and returned mid-January 2021 to allow for self-quarantining after travel. Please see *Appendix D: Fourth Quarter 2020 Photographs*.

## ii. Mitigation Measures and Permit Special Compliance, Monitoring and Reporting

As lead agency under the California Environmental Quality Act, the California State Lands Commission (CSLC) adopted a program for reporting and monitoring the implementation of the Units 2 & 3 Decommissioning Project's mitigation measures as set forth in the Mitigation Monitoring Program (MMP) found in Exhibit C of general lease No. 6785.1. The California Coastal Commission (CCC) incorporated CSLC's mitigation measures, as modified by CCC's Special Conditions, from the 2019 Onshore Decommissioning Coastal Development Permit (CDP).

In 2020, SCE continued to work with CSLC and CCC on the implementation of the plans and programs provided by SCE and approved in 2019 through January 2020.

SCE submitted six biological survey reports in 2020. In coordination with both United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), the Project's Nesting Bird Management Plan provided protection to nesting birds and fledglings through species-specific disturbance-free buffers. Due to negative findings and lack of suitable habitat, both CSLC and CCC agreed to the suspension of surveys for California least tern and western snowy plover until the season before offshore activity work commences. Protection measures for the coastal California gnatcatcher were approved by both USFWS and CDFW and implemented successfully during rail spur upgrade work at the north end of the site. Annual surveys conducted for rare plants in 2020 showed negative findings and responsible agencies agreed that the additional surveys could be postponed for three years. Sensitive bat species surveys were not conducted in 2020 as no demolition activities were scheduled.

The ISFSI Gamma Radiation Monitoring System (IRMS) was installed and is providing real time radiation data streams to local and state agencies. The Radiologic Health Branch of the California Department of Public Health provides a monthly report of the data on their website.

Quarterly decommissioning updates were provided by US mail to all residents within a five-mile radius of SONGS. The quarterly updates were emailed to all applicable agencies and stakeholders. Additionally, quarterly summaries of any public complaints, comments, and concerns received by the SCE Deconstruction Liaison was provided to the CSLC. If contact information was provided, SCE responded within 72-hours. Most phone calls and emails were for employment opportunities and no complaints or concerns with D&D activities were received.

Aspen Environmental Group, retained by the CSLC to provide environmental compliance monitoring and reporting, conducted several site visits in accordance with the site's pandemic protocol. Eleven monitoring reports were generated that documented no non-compliances to the MMP. Worker Environmental Awareness Program (WEAP) training for biological resources is provided to decommissioning personnel by a qualified biologist. Training sign-in sheets are provided to CSLC and Aspen and are available on-site for review.

A Storm Water Pollution Prevention Plan (SWPPP) for Project coverage under the Construction General Permit (CGP) State Water Resources Control Board (SWRCB) Order No. 2009-DWQ as amended by Orders Nos. 2010-0014-DWQ and 2012-0006-DWQ; General Permit No. CAS000002 was established in 2019. SWPPP Monitoring and inspections as required for a Risk Level 2 Project continued in 2020 with no non-compliances reported.

SONGS is also currently covered by an individual National Pollutant Discharge Elimination System (NPDES) permit, Order No. R9-2015-0073, NPDES Permit No. CA0109282. The NPDES permit covers cooling water, waste water treatment plant effluent, and incidental waste streams that result from the operation of the facility. While it does cover stormwater discharges generated in areas of industrial activity, it does not cover stormwater generated in areas disturbed by construction, demolition or decommissioning activities. Those activities are covered under the CGP through the Project's SWPPP. A timely NPDES permit renewal application was submitted in 2020 and is expected to be on the Water Board's agenda in late 2021 to 2022.

Work plans to support the CACA with the California DTSC process to close out the site's RCRA permit were developed, reviewed and approved and will be submitted through early summer 2021. Soil sampling and air monitoring, as per the Agreement, will begin in 2021. The first quarterly report as per the Agreement was provided 15 January 2021.

Coordination calls with all affiliated, interested Tribes was initiated in fourth quarter 2020 to continue Assembly Bill 52 outreach. It is anticipated that one tribe will be contracted to provide monitoring during decommissioning onshore ground disturbance scheduled to begin in summer 2021. Cultural resource and paleontological resource monitoring during limited ground disturbing activities did not yield any unanticipated discoveries during 2020 and no worker non-compliances were reported.

## b. Results of Any Final Status Surveys

Decommissioning work will be conducted pursuant to Nuclear Regulatory Commission (NRC) regulations and oversight to meet the NRC's decontamination release requirements for unrestricted use of the land following decontamination and dismantlement. For unrestricted use and the ultimate return of the property to the DoN, all above-grade structures and all below-grade structures are anticipated to be removed to at least three feet (in most cases) below the existing SONGS Units 2 and 3 grade consistent with the permitted Project description.

Above-grade structures to remain at the end of the Project include the shoreline riprap, seawall and pedestrian walkway (covered by SCE's lease with the CSLC), the ISFSI, SONGS Unit 1 subsurface materials located under the ISFSI, utilities supporting the North Industrial Area and the SDG&E switchyard and related facilities, security features, access roads, parking areas and gunite-covered slopes.

A Final Status Survey will be performed on the remaining below-grade structures, systems and components and their associated soil areas. Additionally, a Final Status Survey for the ISFSI and associated security areas will be conducted once all spent fuel is permanently moved offsite. The survey data will be verified by the NRC or an NRC-appointed independent third party.

After Final Status Surveys are verified and the remaining below-grade structures and/or open areas are deemed to meet NRC license termination requirements, the site will be graded and stabilized per the Onshore Grading Plan (approved by the CCC for Special Condition 4 on December 4, 2019) and per the requirements of the project's SWPPP (approved by the CCC for Special Condition 2 on December 6, 2019), respectively.

No Final Status Survey work was conducted in 2020 and thus, results of any such Final Status Surveys are not available.

Final Status Surveys will be completed prior to the end of decommissioning work, anticipated to be 2028.

### c. Identification of Any Changes to the Project from Final Status Surveys

No Final Status Surveys were conducted in 2020 and thus, no corresponding changes to the Project are proposed. Final Status Surveys will be completed prior to the end of decommissioning work, anticipated to be 2028.

### d. Updates Regarding Opportunities for Long-Term Storage/Disposal of Nuclear Fuel

On August 25, 2017, SCE entered into a *Settlement Agreement Regarding Coastal Development Permit for Storage of San Onofre Spent Nuclear Fuel* ("Settlement Agreement") to resolve a lawsuit regarding a 2015 coastal development permit authorizing the construction of an Independent Spent Fuel Storage Installation ("ISFSI") at SONGS. As set forth in the Settlement Agreement, pending development of a permanent U.S. Department of Energy repository for the Spent Fuel, SCE will use "Commercially Reasonable" efforts, as defined by the Settlement Agreement, to relocate the Spent Fuel to an offsite storage or disposal facility.

SCE documented its progress towards fulfilling the terms of the Settlement Agreement *via* the regular issuance of Settlement Agreement Implementation Status Reports.<sup>1</sup> SCE's efforts regarding opportunities for the long-term storage/disposal of nuclear fuel include the following:

#### i. Development of Inspection and Maintenance Program

In furtherance of SCE's commitment to the safe, long-term storage of spent nuclear fuel, during 2019, SCE developed its SONGS Inspection and Maintenance Program (IMP) consistent with Special Condition 7 of the 2015 ISFSI CDP, the Settlement Agreement, and Special Condition 19 of the 2019 Units 2 and 3 Decommissioning CDP. Implementation of the IMP supports SCE's shared objective with the CCC that

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<sup>1</sup> These Implementation Status Reports may be found on the SONGS Community website here: <https://www.songscommunity.com/used-nuclear-fuel/used-fuel-reports>. Note, these Status Reports also describe SCE's 2017 request that the owners of the Palo Verde Nuclear Generating Station ("Palo Verde") consider a solicitation by SCE for an agreement to expand Palo Verde's ISFSI to store spent nuclear fuel from SONGS. SCE proposed a resolution calling for the approval of further, more detailed discussions between SCE and the other Palo Verde owners to evaluate the feasibility of licensing, constructing, and operating such an expanded facility on commercially reasonable terms. SCE's proposed resolution was not approved and no further action was taken.



the fuel stored in the ISFSI will remain in a physical condition sufficient for onsite transfer and offsite transport. The IMP includes a plan to address contingencies for damaged or cracked canisters.

The IMP was approved by the CCC on 17 July 2020.

SCE has committed to inspections of the stored canisters every five years ~~of the stored canisters~~. Within 180 days of inspections, a summary report will be provided to the CCC. The report will include the inspection results, condition trending review, and any corrective actions taken. In the unlikely event mitigation is required to address any degradation on a loaded fuel canister, the CCC will be notified within 30 days of the decision to mitigate, followed by a plan detailing the actions SCE will undertake to assure future transportability of the canisters.

## ii. Retention of the Experts Team

As part of the effort to relocate SONGS Spent Nuclear Fuel (SNF) to an offsite storage facility, SCE retained a team of expert consultants (the “Experts Team”) to advise SCE on issues related this complex issue, principally, through the development of the Strategic and Conceptual Transportation Plans referenced below. The Experts Team includes one or more expert from each of the following fields: (1) nuclear engineering, (2) spent fuel facility siting and licensing, (3) spent fuel transportation, and (4) radiation detection and monitoring.<sup>2</sup>

## iii. Strategic Plan

To assess alternatives for relocating SONGS SNF to an offsite storage/disposal facility, SCE developed a Strategic Plan (SP) with the support of SCE’s Experts Team and a consortium of consultants headed by North Wind, Inc. (collectively “North Wind”).

The draft of the SP was continuously refined and developed throughout 2020 with a planned release date of early 2021. At the November 2020 Community Engagement Panel virtual meeting, the SP’s anticipated framework was described. There, SCE noted the SP would evaluate various alternatives for the safe, commercially reasonable offsite relocation of SONGS SNF so that SCE may restore the SONGS site and return full control of the property to its owner, the United States Navy.

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<sup>2</sup> SCE retained the following individuals to serve on the Experts Team: (1) Kristopher W. Cummings (Nuclear Engineering), a used fuel storage expert and nuclear engineer; (2) Thomas Isaacs (Spent Fuel Facility Siting and Licensing), a former director of the U.S. Department of Energy’s Office of Policy and former advisor to the U.S. President’s Blue Ribbon Commission on America’s Nuclear Future (Blue Ribbon Commission); (3) Allison Macfarlane (Spent Fuel Siting and Licensing), former Chairman of the United States Nuclear Regulatory Commission (NRC) and former commissioner on the Blue Ribbon Commission; (4) Gary Lanthrum (Spent Fuel Transportation), a former director of the National Transportation Program for Yucca Mountain; (5) Richard C. Moore (Spent Fuel Transportation), a consultant specializing in transportation of radiological materials who works for the Western Interstate Energy Board and preparer of a report for the Blue Ribbon Commission on the relationship between state and federal governments on permitting issues, including transportation; and (6) Dr. Josephine Piccone (Radiation Detection and Monitoring), a former U.S. representative to the International Atomic Energy Agency (IAEA) Radiation Safety Standards Committee and a health physics and radiation control expert with regulatory compliance experience.

#### iv. Conceptual Transportation Plan

In addition to the SP, SCE developed a Conceptual Transportation Plan (“CTP”) supporting the eventual relocation of the SONGS SNF to an offsite interim storage facility or permanent disposal facility.

Like the SP, SCE and North Wind continued to develop the CTP throughout 2020 with an anticipated release in the first quarter of 2021. The CTP was developed in parallel with the SP. It was anticipated that the CTP would focus on offsite transportation logistics, as well as actions that SCE can take to prepare for shipment.

#### e. Potential or Proposed Changes to the Exclusion Area

No reductions in the Exclusionary Area Boundary (EAB) have been completed at this time.<sup>3</sup>

The EAB is a requirement of operating nuclear power plants as one of several boundaries used to demonstrate compliance with off-site accident dose requirements. With SONGS no longer in service and the nuclear fuel relocated to the ISFSI, there is no longer any potential accidents with significant off-site dose potential.

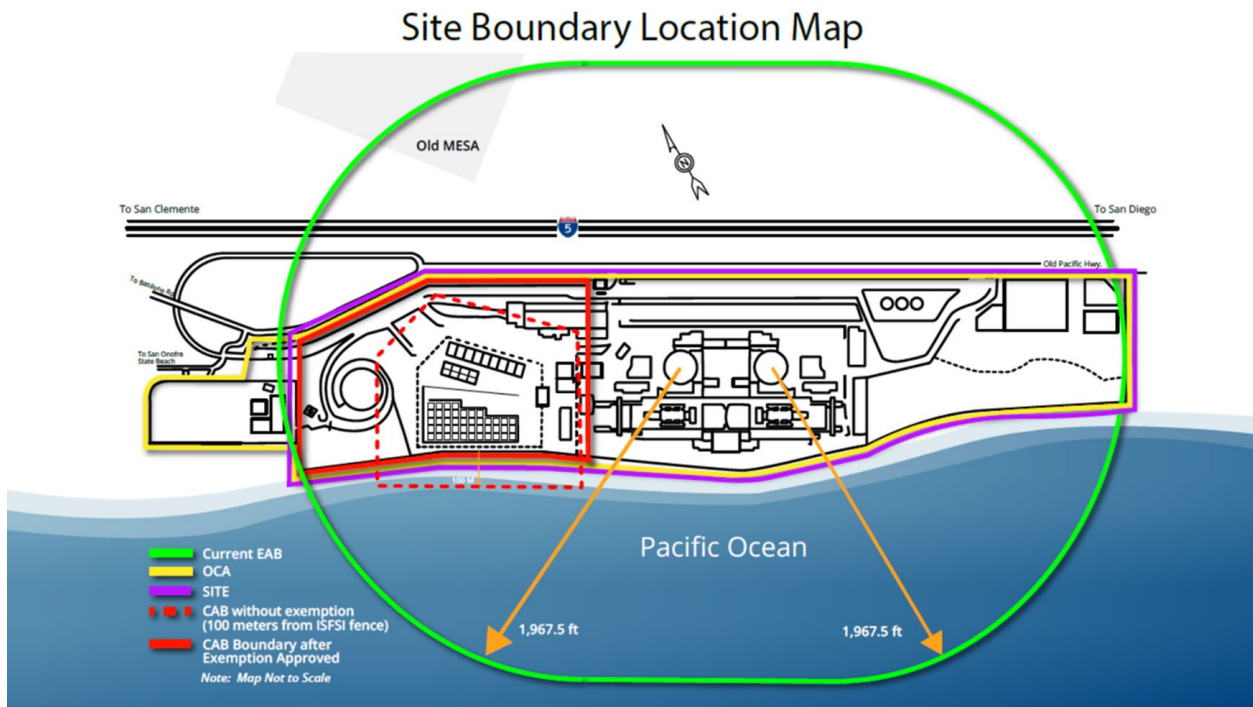
SCE reviewed the legal requirements for eliminating the EAB and determined it would not require Nuclear Regulatory Commission (NRC) approval. Therefore, while a License Amendment Request will not be submitted, consistent with Special Provision 32 of the CSLC’s Lease No. PRC 6785.1, SCE intends to eliminate the EAB.

Further, SCE intends to propose a license exemption request to the NRC to reduce the Control Area Boundary (CAB) to be consistent with ISFSI Only licensing requirements for off-site dose limits. The current CAB overlaps the EAB and this change will bring the CAB wholly within the NRC Licensed Boundary with physical barriers to control access. Please see Figure 1: Site Boundary Map Location, below.

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<sup>3</sup> Special Provision 32 of the California State Lands Commission’s (CSLC) Lease No. PRC 6785.1, provides “[a]t the conclusion of the transfer of the SONGS spent nuclear fuel to the Approved Independent Spent Fuel Storage Installation (Approved ISFSI), the Lessee shall seek approval from the NRC to decrease the size of the Exclusion Area Boundary to the minimum required by law. Lessee and Lessor shall jointly consult with the California Coastal Commission (CCC) to ensure that such an approval, if granted, will not interfere with Lessee’s compliance with CCC permit conditions.”

Figure 1. Proposed CAB and EAB Locations



f. Changes to Project Schedule Activities that Occurred or are Anticipated In 2021

After close to a year of work preparation, 2021 will see the first set of buildings and structures demolished. The site's pandemic protocol will remain in effect consistent with California Governor Gavin Newsom's 2020 Executive Order and any demolition work will continue to ensure the safety of workers, the public, and the environment.

See next page for major work activities are anticipated in 2021:

Table 1: 2021 Major Work Schedule Activities (schedules are subject to change)

Work Location	Major Work Activity	Q1 2021	Q2 2021	Q3 2021	Q4 2021
North and East Plant Side (i.e., Parking Lots 3 & 4)	Material Delivery, Staging, and Removal	✓	✓	✓	✓
North Industrial Area (N building foundations)	Demolition/Foundation Removal			✓	
Containment Buildings and Adjacent Buildings	Construct Containment Access Openings		✓		
Containment Buildings and Adjacent Buildings	Prepare and Remove Reactor Vessel Internals and Systems		✓	✓	✓
Containment Buildings and Adjacent Buildings	Hazardous Materials Removal	✓	✓	✓	✓
Turbine Structures	Hazardous Materials Removal	✓	✓	✓	✓
Turbine Structures	Equipment & Systems Removal			✓	✓
Turbine Structures	Demolition				✓
AWS	Hazardous Materials Removal	✓	✓		
AWS	Demolition/Slab Removal			✓	✓
MUDA Area	Hazardous Materials Removal	✓	✓	✓	
MUDA Area	Demolition		✓	✓	✓
Diesel Generator Buildings	Hazardous Materials Removal	✓	✓		
Diesel Generator Buildings	Demolition		✓	✓	✓
Main/Auxiliary/Reserve Transformers	Hazardous Materials Removal	✓	✓		
Main/Auxiliary/Reserve Transformers	Demolition/Foundation Removal		✓	✓	✓
B & K Buildings, Fire Protection Station/Tanks	Hazardous Materials Removal/Demolition	✓	✓	✓	
Intake Structure Area	Hazardous Materials Removal			✓	✓
Intake Structure Area	Dewater/Clean				✓
Site Wide	Site Characterization & Waste Shipments	✓	✓	✓	✓

**g. Assessment of Any Need to Amend This Permit – None**

Decommissioning work began February 2020 and focused on preparing for the 2021 start of demolition while adhering to the SONGS-specific Pandemic Protocol. The Pandemic Protocol provided additional safety measures to protect workers' health and safety. These site demolition preparation activities included the completion of the remaining pre-construction permit and survey requirements; mobilization and staging of equipment and personnel; rail spur modifications; asbestos abatement within the Containment buildings; shipment of the Unit 1 RPV offsite; the start of Containment structural tendon removal and enlargement of access openings; completion of the Units 2 & 3 spent fuel transfer operations; and implementation of the NRC license changes for ISFSI Only operations. The 2020

schedule milestones as conveyed in the 2019 Progress Report were met with no change to 2021 forecasted Project activities or approach. Therefore, there is no need for a CDP amendment at this time.

### 3 Conclusion

With demolition work on schedule to begin in 2021, all 2020 schedule milestones met, and no change to forecasted Project activities or approach, there is no need for a CDP amendment at this time.

In accordance with Special Condition 3, SCE will submit its 2021 Annual Progress Report on or about June 15, 2022.

# APPENDIX A

First Quarter 2020 Photos

# First Quarter 2020

Photo Credit: Mark Pettijohn



Removal of North Industrial Area north swing gate



Removal of Alimak platform lifts on Unit 3 Containment Dome



Preparation activities for RPV1 transport



Rail spur upgrade work



Preparation activities for RPV1 transport



Asbestos removal work in U2 & U3 Containment



Asbestos removal work in U2 & U3 Containment

# APPENDIX B

Second Quarter 2020 Photos



## Second Quarter 2020



Preparation for RPV1 transportation (photo credit: Mark Pettijohn)



Preparation for RPV1 transportation (photo credit: Mark Pettijohn)



Employee trailer assembly (photo credit: Mark Pettijohn)



Nesting bird protective measures (photo credit: Mark Pettijohn)



RPV1 move to rail spur for offsite transport (photo credit: Mark Pettijohn)



Employee trailer assembly (photo credit: Mark Pettijohn)



Preparation for RPV1 transportation (photo credit: Mark Pettijohn)



RPV1 move to rail spur for offsite transport (photo credit: Mark Pettijohn)



Preparation for RPV1 transportation (photo credit: Troy Girard)



Preparation for RPV1 transportation (photo credit: John Patterson)



Floor plug removal work in the Radwaste Building (photo credit: Mark Pettijohn)

# APPENDIX C

Third Quarter 2020 Photos

# Third Quarter 2020

Photo Credit: Mark Pettijohn



Containment Dome tendon removal



Diamond saw testing within the Unit 2 Crane Bay



Containment Dome tendon removal preparations



Rail line upgrades



Rail line upgrades

# APPENDIX D

Fourth Quarter 2020 Photos

# Fourth Quarter 2020

Photo Credit: Mark Pettijohn



Preparations for Unit 3 generator rotor offsite transportation



Preparations for Unit 3 generator rotor offsite transportation



Removal of friable asbestos containing material (ACM)



Preparation of Unit 3 generator rotor offsite transportation



Rail shipment to Utah