

SONGS

2021 Decommissioning Progress Report

15 June 2022



SOUTHERN CALIFORNIA
EDISON[®]

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
CAB	Controlled Area Boundary
CACA	Corrective Action Consent Agreement
CCC	California Coastal Commission
CDP	Coastal Development Permit
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
FEIR	Final Environmental Impact Report
IMP	Inspection and Maintenance Program
ISFSI	Independent Spent Fuel Storage Installation
IRMS	ISFSI Radiation Monitoring System
MMP	Mitigation Monitoring Program
NRC	U.S. Nuclear Regulatory Commission
NPDES	National Pollutant Discharge Elimination System
RCRA	Resource Conservation and Recovery Act
RVI	Reactor Pressure Vessel Internals
SC	Special Condition
SCE	Southern California Edison Company
SNF	Spent Nuclear Fuel
SONGS	San Onofre Nuclear Generating Station
SP	Strategic Plan
SWPPP	Stormwater Pollution Prevention Plan
WEAP	Worker Environmental Awareness Program

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 2021 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 (D&D) 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" listed above.

This Report describes progress made in 2021, the first full year of decommissioning work. The 2021 activities generally consisted of demolition of buildings and below-ground foundations; shipments of waste off-site, developing work plans for compliance with the California Department of Toxic Substances Control (DTSC) Corrective Action Consent Agreement (CACA) to close-out the facility's Resource Conservation and Recovery Act (RCRA) permit; preparations inside containment to move materials into storage containers; and continuing 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 2022. 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 2021 Annual Progress Report

SCE’s 2021 progress regarding the items identified in Special Condition 3 is set forth below.

a. 2021 Demolition Activities and Environmental Permit Compliance

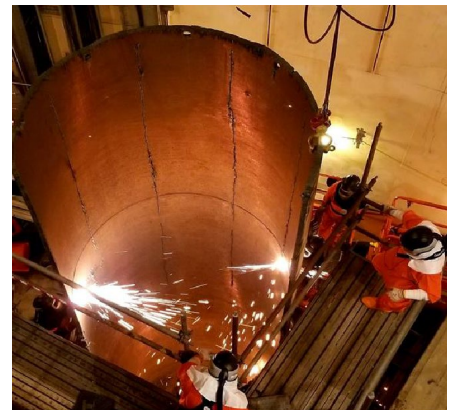
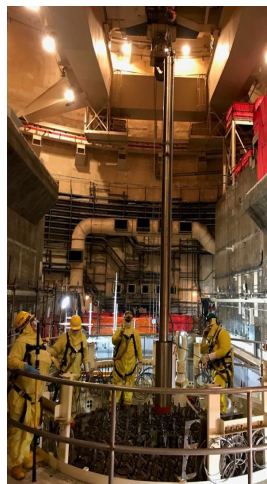
2021 signified the first full year of demolition activities highlighted by the expansion of D&D work and off-site waste shipments. Actions to support environmental compliance and the Project’s CACA with DTSC for non-radiological soil and groundwater investigation needed to close out the SONGS Resource Conservation and Recovery Act (RCRA) permit continued.

As a response to severe acute respiratory syndrome coronavirus 2 (SARS-COV-2/COVID-19), the SONGS pandemic protocol remained in effect during 2021.

i. Containment Dome Dismantlement

Within the containment domes, work proceeded to make room to remove the larger components in advance of future demolition of both structures. Activities in 2021 included modification to enlarge the access openings; installation of waste containers; removal of non-hazardous waste; abatement of asbestos containing materials (ACM); installation and testing of equipment in preparation for cutting up the reactor vessel internal (RVI) components; segmentation and removal of the safety injection tanks; start of work to cut up the Unit 2 RVI components; and preparation for transferring Greater Than Class C waste to the site’s Independent Spent Fuel Storage Installation (ISFSI). Outside, the removal of the cable tendons supporting the containment domes was completed.

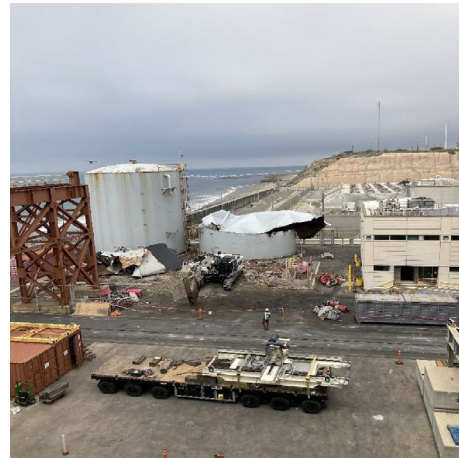
CONTAINMENT DISMANTLEMENT ACTIVITIES



ii. Building and Structure Demolition

In 2021, 27 out of 62 total buildings and structures were demolished. Activities included ACM abatement in administrative buildings, removal of hazardous and universal waste, and sorting of recyclables. Above-ground demolition of several buildings, including the Unit 3 Diesel Generator Building, administrative support buildings, the Unit 2 Turbine Building, and the reserve and main auxiliary transformers, was completed. Underwater dive work was performed to install intake structure dams in anticipation of draining seawater and isolating components scheduled for dismantlement.

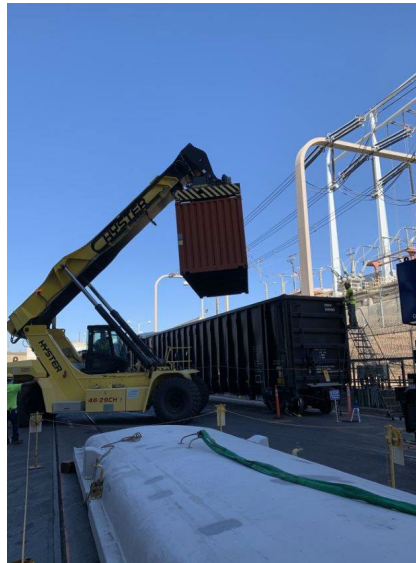
DEMOLITION ACTIVITIES



iii. Waste Shipments

Over the course of decommissioning, it is anticipated that over one billion pounds of waste will be transported off-site for recycling and disposal. To accomplish this, building debris is sorted and packaged for out of state disposal. Radioactive waste is transported by rail to Clive Utah, which will dispose of approximately 90-percent of the Project's radioactive waste, and the remaining is sent by truck to Andrews, Texas. Non-radioactive waste is transported by truck to La Paz, Arizona. To facilitate timely removal of D&D waste and debris, work began in 2021 to install a new railyard and additional rail lines on-site. Off-site shipments in 2021 by both rail and truck totaled over 60 million pounds.

WASTE SHIPMENTS AND RAIL EXPANSION WORK



iv. Environmental and Permit 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 CDP.

In 2021, 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 2021. The Project's Nesting Bird Management Plan provided protection through species-specific disturbance-free buffers. Protection measures and construction noise monitoring for the coastal California gnatcatcher previously approved by both United States Fish and Wildlife Service and California Department of Fish and Wildlife were implemented successfully during nesting season. Sensitive bat species surveys were conducted prior to building demolition with negative findings.

The ISFSI Gamma Radiation Monitoring System (IRMS) continues to provide 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 residents within a five-mile radius of SONGS and emailed to applicable agencies and stakeholders. Additionally, quarterly summaries of any public complaints, comments, and concerns received by the SCE Deconstruction Liaison were 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 regular site visits. Ten monitoring reports were generated, none of which indicated any instance of non-compliance with the MMP. Worker Environmental Awareness Program (WEAP) training for biological resources was provided to 506 new decommissioning personnel by a qualified biologist. Training sign-in sheets are provided to CSLC and Aspen and are available on-site for review.

SONGS is 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 wastewater 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 Construction General Permit (CGP) through the Project's Storm Water Pollution Prevention Plan (SWPPP) established in 2019.¹ The NPDES permit renewal application

¹ SWPPP Monitoring and inspections continued in 2021 with no non-compliances reported.

was submitted in 2020 and is under review with the San Diego Regional Water Quality Control Board and anticipated to be considered at a future meeting held in late 2022 or early 2023.

In 2019, the site entered a CACA with DTSC to close out the SONGS RCRA permit. Key deliverables to the DTSC for the CACA were developed and submitted with comments received, resolved, and incorporated for final approval. Sampling, air monitoring and reporting was provided throughout 2021 and four quarterly reports provided.

Coordination calls with all affiliated and interested Tribes under Assembly Bill 52 outreach continued throughout 2021. Tribal monitoring is provided by the Rincon Band of Luiseño Indians and conducted with cultural resource and paleontological resource monitoring for decommissioning onshore ground disturbance.

b. Results of Any Final Status Surveys

Decommissioning work has been and will continue to 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 D&D. For unrestricted use and the ultimate return of the property to the Department of the Navy (DoN), 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 4 December 2019) and per the requirements of the project's SWPPP (approved by the CCC for Special Condition 2 on 6 December 2019), respectively.

No Final Status Survey work was conducted in 2021 and thus, results of any such Final Status Surveys are not available.

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

No Final Status Surveys were conducted prior to or in 2021 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 25 August 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 ISFSI at SONGS. As set forth in the Settlement Agreement, pending the availability of a licensed offsite facility for the spent nuclear fuel (SNF), SCE will use “Commercially Reasonable” efforts, as defined by the Settlement Agreement, to relocate the SNF 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.² The final such Status Report was issued on 1 April 2021, following publication of the *Strategic Plan for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or a Repository and a companion Conceptual Transportation Plan* on 15 March 2021.

SCE’s efforts regarding opportunities for the long-term storage/disposal of SNF 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 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, including a proven method to implement repairs.

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

SCE has committed to inspections of the stored canisters every five years. 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.

² 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 rejected by the other owners and no further action was taken.

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 Strategic and Conceptual Transportation Plans, as referenced below. The Experts Team includes one or more expert(s) 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.³

iii. Strategic Plan

To assess alternatives for relocating SONGS SNF to an offsite storage/disposal facility, SCE developed a *Strategic Plan for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or a Repository* (SP) with the support of SCE’s Experts Team and a consortium of consultants headed by North Wind, Inc. (collectively “North Wind”). The SP evaluates 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.

The draft of the SP was continuously refined and developed throughout 2020 with and released on 15 March 2021, in conjunction with a public meeting of the SONGS Community Engagement Panel. At the virtual meeting, North Wind representatives outlined the SP’s framework, findings, and recommendations.

iv. Conceptual Transportation Plan

In addition to the SP, SCE developed a *Conceptual Transportation Plan for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or Repository* (CTP) supporting the eventual removal of SNF from SONGS. The CTP focuses on offsite transportation logistics, as well as actions that SCE can take to prepare for shipment.

Like the SP, SCE and North Wind continued to develop the CTP throughout 2020 and SCE released the CTP on 15 March 2021. The CPT was developed in parallel with the SP.

³ 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.

v. Dissolution of the Experts Team

With the SP and CTP completed and released in March 2021, SCE disbanded the Experts Team. North Wind also completed its scope of work in the spring of 2021.

vi. Ongoing Strategic Advice

SCE continues to retain the former Chair of the Experts Team, Thomas Isaacs, who now serves as Independent Advisor for Spent Fuel Management. SCE also continues to maintain a contractual relationship with North Wind such that SCE may call upon key North Wind staff on an as-needed basis.

vii. Action Plan

Based on findings and recommendations in the SP and CTP, SCE prepared an *Action Plan for the Relocation of SONGS Spent Nuclear Fuel to an Offsite Storage Facility or a Repository* (AP). The AP was released together with the SP and CTP on 15 March 2021.

Concurrent with release of these plans on March 15, 2021, SCE announced the formation of the Action for Spent Fuel Solutions Now coalition, whose mission is to advocate for federal solutions to offsite SNF storage and disposal. In addition to SCE, co-founders included the County of Orange, County of San Diego, San Diego Gas & Electric Company and the City of Riverside. By the end of 2021, the coalition had grown to include approximately 200 members representing diverse stakeholder groups, from Native American and organized labor, to business groups and environmental organizations.

viii. Federal Spent Fuel Management Program

In December 2021, the federal government – the United States Department of Energy (DOE), in particular – effectively restarted the federal SNF management program with the issuance of a request for information (RFI) on federal consolidated interim storage facilities for commercial SNF. Input on the RFI was due by 4 March 2022. SCE and the Action for Spent Fuel Solutions Now coalition were among 220 entities and individuals who provided input to DOE.

Appropriations and direction from Congress have facilitated the renewed efforts. Senior DOE officials have stated that significant work can be done to advance consolidated interim storage under existing authorization.

Moving forward, DOE staff have indicated an intent to issue a funding opportunity announcement later in 2022, to provide communities that are interested in considering serving as a host to consolidated interim storage facilities with access to resources and expertise to make informed decisions.

e. Potential or Proposed Changes to the Exclusion Area

During 2021, no reductions in the Exclusionary Area Boundary (EAB) were performed.⁴

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 for an accident with significant off-site dose potential.

SCE reviewed the regulatory requirements for eliminating the EAB and has determined it would not require 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 after the completion of the ongoing effort of moving the Greater Than Class C waste into the site's ISFSI, which is expected in 2023.

Relatedly, on 16 December 2021 SCE submitted a license exemption request⁵ to the NRC to reduce the Control Area Boundary (CAB) to be consistent with "ISFSI Only" licensing requirements for off-site dose limits. The CAB, which limits personnel access to control and restrict radiation exposure, currently overlaps the EAB. This change, if approved by the NRC, will bring the CAB wholly within the NRC Licensed Boundary with physical barriers to control access.

f. Changes to Project Schedule Activities that Occurred or are Anticipated In 2022

With major D&D activities underway, work in 2022 will focus on continuing segmentation and removal of components inside the containment domes; above-ground building and structure demolition; completion of isolating the intake structures; off-site transportation of project waste; and sampling, monitoring, and reporting for the DTSC CACA.

See Table 1, below, for major work activities are anticipated in 2022:

⁴ 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 reduce the size of the Exclusion Area Boundary to the minimum required by law. SCE and CSLC shall jointly consult with the California Coastal Commission (CCC) to ensure that such an approval, if granted, will not interfere with SCE's compliance with CCC permit conditions."

⁵ Request for Exemption from 10 CFR 72.106(b) for the San Onofre Nuclear Generating Station (SONGS) Independent Spent Fuel Storage Installation (ISFSI). Link to document: [NRC ADAMS record number ML21355A241](#)

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

Work Location	Major Work Activity	Q1 2022	Q2 2022	Q3 2022	Q4 2022
North and East Plant Side (i.e., Parking Lots 3 & 4)	Material Delivery, Staging, and Removal	✓	✓	✓	✓
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	✓	✓	✓	✓
MUDA Area	Demolition	✓	✓		
Intake Structure Area	Hazardous Materials Removal	✓	✓		
Intake Structure Area	Dewater/Clean/Survey	✓	✓	✓	✓
Site Wide	Site Characterization & Waste Shipments	✓	✓	✓	✓

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

Demolition work and off-site transportation of waste was the focus of 2021 activities while adhering to the SONGS-specific Pandemic Protocol. The Pandemic Protocol, first implemented in 2020, continued to provide additional safety measures to protect workers’ health and safety. Site activities included biological surveys; continued mobilization and staging of equipment and personnel; rail spur modifications; asbestos abatement; preparation and removal activities inside the containment domes; and sampling, monitoring and reporting to support the DTSC CACA. The 2021 schedule milestones, as conveyed in the 2020 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 D&D work the focus for 2021, all 2021 schedule milestones met, and with 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 2022 Annual Progress Report on or about 15 June 2023.