



1/25/2023

Texas Low-Level Radioactive Waste Disposal Compact Commission
Attn: Executive Director, TLLRWDC
919 Congress Avenue, Suite 830
Austin, Texas 78701

Texas Commission on Environmental Quality
Attn: Ashley Forbes
12100 Park 35 Circle, Bldg F
Austin, TX 78753

Compact Facility Operator – Waste Control Specialist LLC
Attn: Kelly Scruggs
17101 Preston Road, Suite 115
Dallas, TX 75248


Subject: Southern California Edison (SCE) San Onofre Nuclear Generating Station (SONGS), EnergySolutions (ES) Units 2/3 Import Application 1-0348-00

To the TLLRWDC, TCEQ and Compact Facility Operator-WCS:

Please let this letter and attachments confirm the requirements as set forth in 31 TAC §675.23 (f) that an import applicant is to deliver a copy of the import application and any supplements to the Texas Low Level Radioactive Waste Compact Commission (TLLRWDC), the Compact Facility operator (WCS) and the Texas Commission on Environmental Quality (TCEQ).

Attached to this letter for review and records are 1) TLLRWDC §675.23 – Importation Form AMENDMENT, 2) SCE SONGS Authorization Letter to EnergySolutions, 3) ES RVI 3-60 Liner CPP Summary, and 4) Copy of TLLRWDC online Importation Form submittal dated 6/14/2022 for Posted Application 1-0348-00.

On Behalf of SCE SONGS:

DocuSigned by:

By: 43F5DEDE4CB849A...

Name: Scott R Baskett

Title: Senior Vice President

Attachments

1 - Importation Form, 2 - SCE SONGS Authorization, 3 - ES RVI Liner Summary, 4 - Online Import Form



ATTACHMENT 1

TLLRWDC §675.23 – Importation Form

Figure: 31 TAC §675.23(e)(1)

ANNEX A

TLLRWDC §675.23—IMPORTATION FORM

TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION APPLICATION FOR IMPORTATION OF NON-PARTY LOW-LEVEL RADIOACTIVE WASTE (NOTE: PURSUANT TO TEXAS HEALTH AND SAFETY CODE, §401.207(j), THIS PETITION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE OR THE GENERATOR OF THE WASTE UNLESS THE GENERATOR IS A SMALL QUANTITY GENERATOR AS DEFINED IN 31 TAC §675.20(19), IN WHICH CASE THE PETITION MAY BE SUBMITTED BY AN APPROPRIATELY LICENSED BROKER) (Article III, Sec. 3.05(7) of the Compact)

I. Applicant Information:

Entity Name: EnergySolutions, LLC acting on behalf of San Onofre Nuclear Generating Station

Contact Person, Title: AJ Jahr, Waste Manager

Phone: 949-933-1635

Email: arjahr@energysolutions.com

Website: _____

Business Address: EnergySolutions, LLC acting on behalf of San Onofre Nuclear Generating Station

5000 Old Pacific Coast Hwy

San Clemente, CA 92672

Mailing Address: EnergySolutions, LLC acting on behalf of San Onofre Nuclear Generating Station

5000 Old Pacific Coast Hwy

San Clemente, CA 92672

Is applicant:

- Generator
- Broker
 - Licensed Waste Processor
 - Licensed Waste Collector
- Department of Defense

II. Generator Specifications:

A. Generator type:

- Industrial
- Academic/Research
- Medical
- Utility
- Government

B. Is waste from a "small quantity generator"?

- Yes
- No

III. Agreement Period:

Import applications generally will be granted only in single fiscal-year increments. If you are seeking a term that would extend beyond the end of a current fiscal year, please explain the unusual circumstances that would justify a deviation from this general rule?

September 1, 2022 through August 31, 2023

IV. Waste proposed for importation:

Waste Volume (Cubic Feet): 559.0

Waste Radioactivity (Curies): 14,000

Waste Classification:

- Class A,
- Class B, and/or
- Class C

Waste Form

- Stable
- Unstable

Does the proposed waste consist solely of sealed sources?

- No.
- Yes.

Compact and/or unaffiliated state, territory, possession, or district of the United States where the waste was generated (please list):

California - Southwestern Low-Level Radioactive Waste Disposal Compact

Waste Description: Segmented Irradiated Hardware

The total radioactivity and volume of irradiated hardware waste is contained within ten (10) 3-60 liners with an
external volume of 55.9 cubic feet each. There are four (4) Class C Liners.

V. Compliance

Does Applicant have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) with the Texas Low-Level Radioactive Waste Disposal Compact Commission?

- No.
- Yes. Please explain and attach applicable documents.

Does Applicant have any unresolved violation(s), complaint(s), unpaid fee(s), or past due reports associated with radioactive waste receipt, storage, handling, management, processing, or transportation pending with any other regulatory agency with jurisdiction to regulate radioactive material including, without limitation, the Texas Commission on Environmental Quality (TCEQ)?

- No.
- Yes. Please explain and attach applicable documents.

VI. Certifications

Applicant hereby certifies* the following:

- The information provided herein is complete, accurate, and correct.
- The waste proposed for importation is not waste of international origin.
- The low-level radioactive waste for which this Import Application is submitted will be packaged and shipped in accordance with applicable state and federal regulations and is acceptable for disposal at the Compact Facility.
- The person submitting this Import Application is authorized by the Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Non-Party Compact Waste. A copy of a written document containing such authorization must be attached to this Import Application.
- Applicant has delivered to the specified disposal facility and TCEQ a copy of this Application for Importation of Compact Waste (along with any supplement or amendment thereto).

* If any box is left unchecked, the Commission will assume that requirement was not met.

VII. Authorized Signatory:

Scott Baskett

AJ Jahr

Print or type name

AJ JAHR

Digitally signed by AJ JAHR
DN: cn=US, ou=Waste Management, cn=EnergySolutions, CN=AJ
JAHR, e=ajjahr@energysolutions.com
Reason: I am approving this document
Location: San Clemente, CA 92673
Date: 2023.01.24 16:45:12
Full Photo: 028-1000000-972

DocuSigned by:
Scott Baskett
43F5DEDE4CB849A...

Signature

Waste Manager

Title

January 24, 2023

Date

VIII. ATTACHMENTS:

(Attachments should include all applicable licenses, authorizations, and other materials needed or useful to fully explain the Import Application.)



ATTACHMENT 2

SCE SONGS Authorization Letter to EnergySolutions

SCE SONGS Authorization Letter

In accordance with the Decommissioning Governing Contract Agreement (DGCA), (PO 4500895498), Exhibit CC and the SONGS Permitting Plan Appendix A - Compliance Matrix (SDS-RA1-LST-0001), SDS Waste Management workgroup has ownership and responsibility for the submittal and obtaining approval of the Texas Low Level Radioactive Waste Disposal Compact Commission (TSSRWDC) Importation permit.

Obtaining a standalone authorization letter is not required.

Reference table below with breakdown of requirements identified in the SONGS Permitting Plan Appendix A - Compliance Matrix (SDS-RA1-LST-0001).

ID#	Permit Name	Action Requiring Permit/Approval	Law/Regulation	Regulatory Agency	Active Permit	Company Permit	Contractor Permit	Existing SONGS Permit	Modifications required for this source of the Work.	Description of Required Modifications	SDS Department	SDS Ownership	SDS Responsible Party	Source
95	Texas Low Level Radioactive Waste Disposal Compact Commission (TSSRWDC) Importation	Receive advance approval prior to placing any shipment of LLRW in transit	Title 30/chapter 336/Radioactive substance Rules	Texas Low Level Radioactive Waste Disposal Compact Commission (TSSRWDC)	Y	N	Y	Y	Y	Modifications required to cover decommissioning activities	Waste Management	Waste Manager	Waste Manager	SCE Transition Plans



ATTACHMENT 3

ES RVI 3-60 Liner Summary

ES RVI 3-60 Liner Summary

SCE SONGS ES RVI 3-60 Liner Summary			
Liner Number	Total Activity (Ci)	Container Disposal Volume (ft3)	Estimated Waste Class
MHF-3227-003	357	55.9	B
MHF-3227-006	235	55.9	B
MHF-3227-007	333	55.9	B
MHF-3227-001	1,868	55.9	C
MHF-3227-005	1,868	55.9	C
MHF-3227-004	1,867	55.9	B
MHF-3227-008	1,868	55.9	B
MHF-3227-009	1,868	55.9	B
MHF-3227-010	1,868	55.9	C
MHF-3227-002	1,868	55.9	C
Totals	14,000	559	



ATTACHMENT 4

Copy of TLLRWDC Online Importation Form Submittal

Dated 6/14/2022 for Posted Application 1-0348-00

Entity Name

EnergySolutions on behalf of Southern California Edison San Onofre Nuclear Generating Station Units 2/3

Contact Person

Michael Cuarenta

Email

macuarenta@energysolutions.com

Phone

(760) 672-8219

Website / URL

Empty

Business Address

EnergySolutions, LLC

5000 Old Pacific Coast Hwy, MS D3B

San Clemente, CA

92673

Mailing Address (if different)

Empty

Applicant is

Generator

Generator Type

Utility

Is waste from a "small quantity generator"?

No

Import applications generally will be granted only in single fiscal-year increments. If you are seeking a term that would extend beyond the end of a current fiscal year, please explain the unusual experiences that would justify a deviation from this general rule?

September 1, 2022 through August 31, 2023

Waste Volume (Cubic Feet)

447.2

Waste Radioactivity (Curies)

14000

Waste Classification

Class B

Class C

Waste Form

Unstable

Does the proposed waste consist solely of sealed sources?

No

Compact and/or unaffiliated state, territory, possession, or district of the United States where the waste was generated (please list)

California - Southwestern Low-Level Radioactive Waste Disposal Compact

Waste Description

Segmented Irradiated Hardware - The total radioactivity and volume of irradiated hardware waste is contained within eight (8) 3-60 liners with an external volume of 55.9 cubic feet each. There are four (4) Class C Liners.

Does Applicant have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) with the Texas Low-Level Radioactive Waste Disposal Compact Committee?

No.

Applicable Documents #1

Empty

Does Applicant have any unresolved violation(s), complaint(s), unpaid fee(s), or past due reports associated with radioactive waste receipt, storage, handling, management, processing, or transportation pending with any other regulatory agency with jurisdiction to regulate radioactive material including, without limitation, the Texas Commission on Environmental Quality (TCEQ)?

No.

Applicable Documents #2

Empty

Applicant hereby certifies* the following:

The information provided herein is complete, accurate, and correct.

The waste proposed for importation is not waste of international origin.

The low-level radioactive waste for which this Import Application is submitted will be packaged and shipped in accordance with applicable state and federal regulations and is acceptable for disposal at the Compact Facility.

The person submitting this Import Application is authorized by the Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Non-Party Compact Waste. A copy of a written document containing such authorization must be attached to this Import Application.

Applicant has delivered to the specified disposal facility and TCEQ a copy of this Application for Importation of Compact Waste (along with any supplement or amendment thereto).

Name

Michael Cuarenta

Title

Waste Compliance Manager

Date

06/14/2022

Other Comments

Empty

Other Applicable Documents

[Importation-Form-SIGNED.pdf](#)

ID

ID will be automatically assigned in the next 24 hours