CALIFORNIA COASTAL COMMISSION
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October 4, 2010

Dr. David Kay
Southern California Edison Company
P.O. Box 800
Rosemead, CA 91770

Re: Compliance with Condition B of the SONGS Permit No. 6-81-330-A: SCE's 2008 Annual Marine Environmental Analysis Report

Dear David:

On October 12, 2000, the California Coastal Commission concurred with the Executive Director's determination regarding the fish behavioral barriers required by Condition B of the coastal development permit for the San Onofre Nuclear Generating Station Units 2 and 3 (No. 6-81-330-A, formerly 183-73). (See staff report entitled *Executive Director's Determination that Fish Behavioral Barriers Tested at SONGS are Ineffective*, dated September 22, 2000.) As part of that permit compliance action, the Executive Director specified continuing monitoring requirements, which included submission of a written report of the Fish Chase procedure used at the plant.

As required, SCE submitted the 2008 Annual Marine Environmental Analysis Report for the San Onofre Nuclear Generating Station. Chapter 4 of the report contains an assessment of in-plant fish, which includes data and analysis of the Fish Chase procedure.

Specifically we note the following (please also see Attachment 1):

(1) The impingement for 2008 was about 23,233 kg (1,084,082 individuals), which was somewhat less than the long-term annual average of 26,285.

(2) The Fish Chase procedure resulted in 2709 kg of fish returned live to the ocean, which was much less than the long term annual average of 6042 kg.

(3) For the year 2008 the Fish Chase effectiveness relative to impingement was 11.66%, slightly higher than the 10% target value. In addition, the long term average continues to exceed 20%.

(4) After two very low impingement years in 2006 and 2007, the biomass impinged in 2008 returned to a level very close to the long term average.

(5) There was a clear discussion concerning methods, results and interpretation of results.

(6) Species of special interest were impinged in 2008 (which is typical). [Note: numbers for fish are based on extrapolation of sampled impingement during normal operation + actual impingement during heat treatments. This was not done in reports earlier than 2007]. Species included:

Species	Status	Impinged and killed	Returned alive
California halibut	Important sport and commercial fish	191	10
Cabezon	Species of special concern	390	6
Bocaccio	Species of special concern	0	0
Giant seabass	Protected in CA	2	10
Kelp bass	Important recreational fish	15	25
White seabass	Import sport and commercial fish	11	33

Mammals and turtles affected by operations

Species	Mammals and Turtles	Found Dead	Returned Alive
California sea lion	Marine mammal protection act	28	5
Harbor seal	Marine mammal protection act	7	12
Green sea turtles	Endangered species act	0	0

(7) Mortality rates (defined as "the biomass of fish killed during a heat treatment divided by the biomass of fish entrained (fish impinged plus fish returned alive via the FRS)) during the fish chase procedures were not unusually high during 2008. Higher than normal mortality is defined as: (1) a sequence of three or more heat treatments where the mortality rate exceeds 50%, (2) more than 50% of heat treatments in a given year have more than a 50% mortality rate, or (3) mortality rate for the year exceeds 50%.

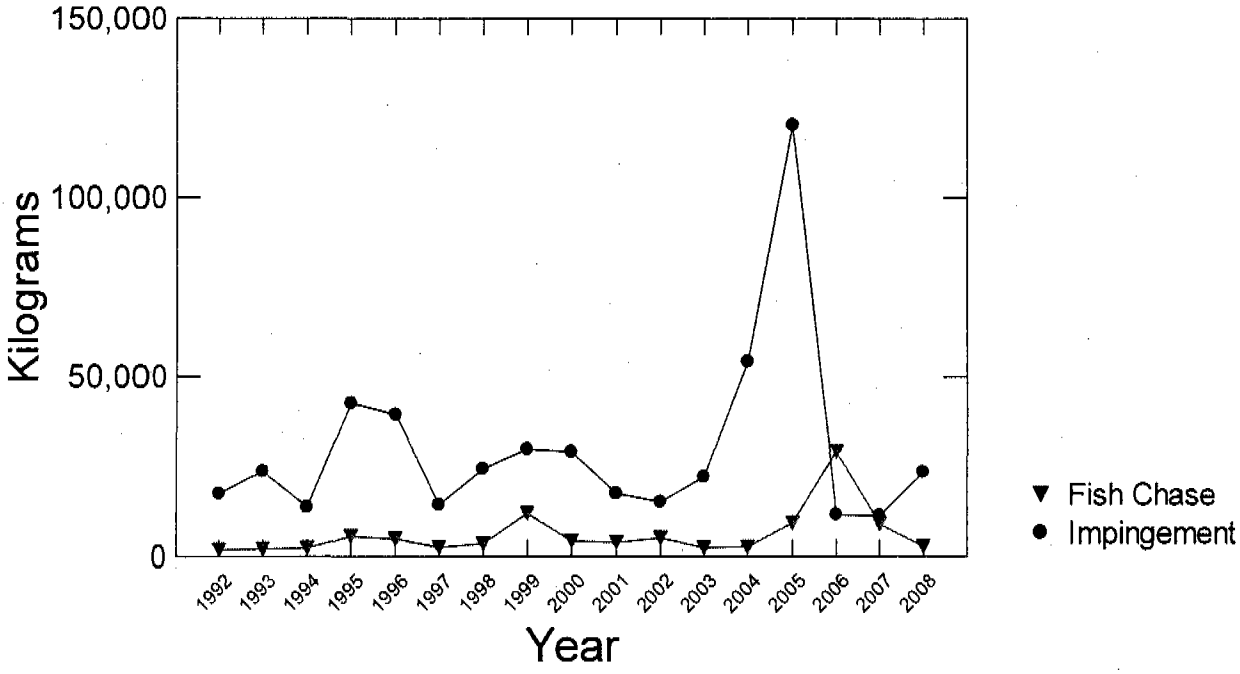
Hence, our assessment of the results of Chapter 4 indicate that the operation of the Fish Chase procedure during 2008 was consistent with the standards enumerated in the Executive Director's determination.

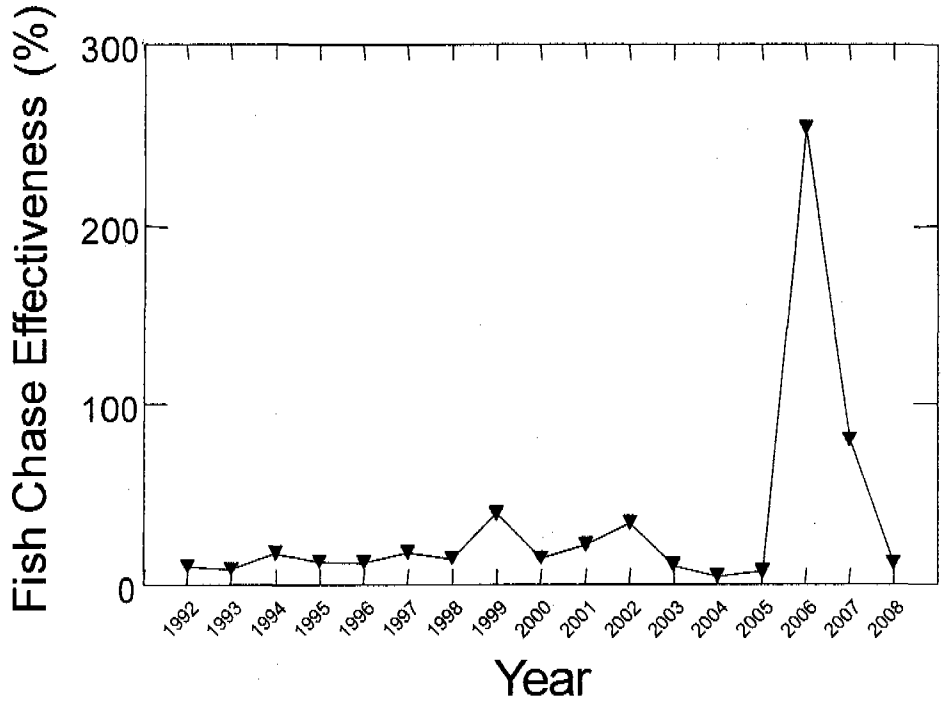
Thank you for your continuing cooperation with the Commission staff in addressing the Commission's behavioral barriers permit condition.

Sincerely,

Susan M. Hansch
Chief Deputy Director

cc: Patrick Tennant





ATTACHMENT 1