

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
3337 Michelson Drive Suite 380
Irvine, CA. 92612-8894



May 5, 2005

Mr. Andrew Barnsdale, SONGS/CPUC
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

File: IGR/CEQA
SCH#: 2004101008
Log #: 1468A
SR: I-5

**Subject: San Onofre Nuclear Generating Station (SONGS) Steam Generator
Replacement Project DEIR**

Dear Mr. Barnsdale,

Thank you for the opportunity to review and comment on the **DEIR** dated April 2005, for the **SONGS Steam Generator Replacement** project. The project site is located on the Pacific coastline in North San Diego County adjacent to San Clemente and the Orange County line, Interstate 5, Camp Pendleton and San Onofre State Beach. The project consists of removal, deconstruction, transportation and disposal of the existing steam generators 2 & 3, and shipment, transportation and construction of the new replacement steam generators from five proposed alternatives.

Caltrans District 12 status is a reviewing agency on this project and has the following comments:

1. Our comments from the NOP review still stand. (Please see attached).
2. In addition, we acknowledge that Caltrans District 11 in San Diego would be the lead in permitting and guiding this project except where transport should cross into Orange County within State Routes at any time during staging, demolition, reconstruction, and transport of radioactive waste for storage. At that time Caltrans District 12 needs to be involved in order to study proposed routes and submit its own feedback. In addition, HQ Truck and Weight State, State Division of Extra Legal Trucks, and State Division of Variance Coordinator would also need to be consulted. The CHP may also need to be consulted regarding the nature of the cargo.
3. As soon as a final transportation route for disposal is set, a Traffic Control Plan should be filed and a Transportation Permit may be required. Please call (909) 383-4637 for information regarding a Transportation Permit.

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Please continue to keep us informed of this project and other future developments, which could potentially impact our transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maureen El Harake at (949) 724-2086.

Sincerely,



Robert F. Joseph, Chief
IGR/Community Planning Branch

c: Bob Joseph, Branch Chief - IGR/Community Planning
Terry Pencovic, HQ IGR/Community Planning
Raouf Moussa, Traffic Operations South
Mory Mohtashami, Permits Branch

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
3337 Michelson Drive Suite 380
Irvine, CA. 92612-8894



November 1, 2004

Mr. Nicolas Procos
California Public Utilities Commission
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

File: IGR/CEQA
SCH#: N/A
Log #: 1468
SR: I-5

Subject: San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project NOP

Dear Mr. Procos,

Thank you for the opportunity to review and comment on the **Notice of Preparation** dated 10/01/04, for the **SONGS Steam Generator Replacement** project. The project site is located on the Pacific coastline in North San Diego County adjacent to San Clemente and the Orange County line, Interstate 5, Camp Pendleton and San Onofre State Beach. The project consists of removal, deconstruction, transportation and disposal of the existing steam generators 2 & 3, and shipment, transportation and construction of the new replacement steam generators from five proposed alternatives.

Caltrans District 12 status is a reviewing agency on this project and has the following comments:

1. Caltrans District 12 will become a responsible permitting agency should the ultimate transportation of the decommissioned generators and/or the replacement generators pass over or onto State Right of Way in Orange County.
2. Transporting and/or maneuvering equipment to transport either replacement generators or disposal generators (and parts) over, under or onto State Right of Way or facilities would need an Encroachment Permit(s). Please see our Permit website for more details at: <http://www.dot.ca.gov/hq/traffops/developserv/permits>. Also, please see the standard Environmental and cultural requirements for an Encroachment Permit (attached). Care should be taken during construction to cover all loads for this project to prevent tracking onto State Right of Way and facilities. Construction Traffic should file a management plan to avoid peak travel periods on Ortega Highway and Interstate 5. In District 12, you may contact Mory Mohtashami, Encroachment Permits Branch Chief at (949) 724-2525.
3. Consider the option of transporting the replacement generators and/or the disposal parts by rail. The NOP states that the dimensions of the steam generators are approximately 65 feet in eight, 22 feet in diameter (at the steam dome), and approximately weighs 620 tons. It seems highly infeasible to transport these devices on State Highways. Vertical and horizontal clearances as well as weight would be a significant impact to the State facilities. For intact generators, gaining vertical clearance of the bridges would be impossible.

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4. The report states that the removal of the old generators would involve their destruction, and part of the dome would be cut up into pieces in order to reduce the volume of waste. The waste would be placed in shipping containers for shipment to a licensed low-level radioactive waste disposal facility. (Currently an unidentified facility in Utah is the tentative terminal for this waste). If this shipment needs to be transported on State Highways, CHP Hazardous Materials Unit would need to be consulted.
5. Notification must also be made to the Truck Services Managers in District 11 (San Diego) and District 12 (Orange County) and any other District through which this material may pass; for approval of the final truck routing should that alternative be selected.

Please continue to keep us informed of this project and other future developments, which could potentially impact our transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maureen El Harake at (949) 724-2086.

Sincerely,

Robert F. Joseph, Chief
IGR/Community Planning Branch

c: Bob Joseph, Branch Chief - IGR/Community Planning
Terry Pencovic, HQ IGR/Community Planning
Raouf Moussa, Traffic Operations South
Praveen Gupta, Environmental Planning A
Mory Mohtashami, Permits Branch