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**EDISON**

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February 24, 2003

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Re: Southern California Edison Company's Comments on the California Electricity Generation Facilities Standards Committee's Proposed Generating Facility Logbook Requirements

Dear Committee Members and ALJ Sullivan:

Southern California Edison Company ("SCE") hereby offers its comments on the California Electricity Generation Facilities Standards Committee's ("Committee") draft Generating Facility Logbook Requirements, issued on February 3, 2003 ("Logbook Requirements") (the "Standards"). SCE's comments are detailed in the document attached to this letter and summarized below.

Developing Logbook Requirements that are fair, balanced and flexible enough to be applied to all generators in California is a difficult task. The Logbook Requirements must recognize there are an infinite number of equally valid and appropriate ways for generating facilities to keep logbooks. SCE submits that the goal of the Logbook Requirements should ensure that each facility has an effective program to document facility operations rather than trying to specifically require each and every element be required in the logbook.

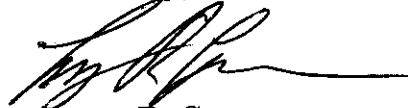
SCE is concerned that the Logbook Requirements mandate logs, entries and procedures in a one size fits all. It imposes logbook requirements in a manner far beyond what SCE currently does. For example, SCE does not have shift supervisors nor shift supervisors logbooks for its hydro operations.

SCE believes the proposed Logbook Requirements if mandated for public utilities will be a large imposition upon SCE's hydro and nuclear operations. Those impositions are set forth in our attached comments in greater detail.

SCE believes the Logbook Requirements must be revised to make clear that nuclear facilities are exempt (with the exception of limited reporting requirements) as clearly set forth in California Public Utilities Code § 761.3(d)(1). SCE submits the Committee must apply this same limitation to hydroelectric facilities licensed by the Federal Energy Regulatory Commission ("FERC"), in recognition of FERC's exclusive jurisdiction under Part I of the Federal Power Act. These facilities would make the appropriate filings with the Committee and the CPUC but not be mandated to comply with someone's abstract concept of what every generating facility's logbook should look like.

SCE would like to thank the Committee for the opportunity to comment on the draft Logbook Requirements. We hope the Committee will find the attached comments useful in adopting fair, workable standards that meet the intent of the California Public Utilities Code § 761.3.

Sincerely,



Larry R. Cope

cc: Electronic Service List, Rulemaking 02-11-039

LRC:as:LW030520012.doc

Enclosure

**BEFORE THE CALIFORNIA ELECTRICITY GENERATION FACILITIES  
STANDARDS COMMITTEE**

Rulemaking to Implement the Provisions )  
of Public Utilities Code §761.3 Enacted by ) R.02-11-039  
Chapter 19 of the 2001-02 Second )  
Extraordinary Legislative Session. )  
\_\_\_\_\_ )

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
ON THE PROPOSED GENERATING FACILITY LOGBOOK  
REQUIREMENTS**

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Dated: February 24, 2003

**BEFORE THE CALIFORNIA ELECTRICITY GENERATION FACILITIES  
STANDARDS COMMITTEE**

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**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
ON THE PROPOSED GENERATING FACILITY LOGBOOK  
REQUIREMENTS**

Southern California Edison Company (SCE) hereby submits these comments on the Committee's proposed Generating Facility Logbook Requirements ("Logbook Requirements").

**I.**

**SCE'S GENERATING FACILITIES**

SCE owns and operates a number of generating facilities in California and outside California. SCE has an interest in two nuclear generating facilities. SCE is the majority owner and operator of the San Onofre Nuclear Generating Station ("SONGS"), located in northern San Diego County, California and is a minority owner in the Palo Verde Nuclear Generating Station, located outside of Phoenix, Arizona which has Arizona Public Service Company ("APS") as the majority owner and operator. SCE also is the majority owner and operator of the coal-fired Mohave Generating Station in Laughlin, Nevada and is a minority owner of the coal-fired Four Corners Coal Plant of which APS is the majority owner and operator. In addition, SCE operates and maintains 36 hydro generating plants consisting of 79

generating units, 33 dams, 46 stream diversions, and 143 miles of tunnels, conduits, flumes, and flow lines. These hydro resources have an aggregate 1,156 MW of generating capacity. Most of the hydro units are operated under Federal Energy Regulatory Commission (“FERC”) licenses. The units were constructed over an extended period of time; some as early as 1893 and others as recently as 1999.

## II.

### **COMMENTS ON THE PROPOSED GENERATING FACILITY LOGBOOK REQUIREMENTS**

#### **A. Nuclear**

Public Utilities Code Section 761.3 acknowledges that the operation and maintenance of many types of generating facilities are already subject to regulation by the Nuclear Regulatory Commission (“NRC”), the Federal Energy Regulatory Commission (“FERC”), and the California Independent System Operation (“CAISO”).

In that regard, the Legislature has properly exempted nuclear facilities from the Generation Maintenance Performance Standards and Assessment Guidelines since they are federally regulated and subject to standards developed by the NRC. Moreover, each of these nuclear facilities are members of the Institute of Nuclear Power Operations (“INPO”), an organization devoted to promoting the highest levels of safety and reliability for nuclear facilities. The Committee should recognize this and not force a “one size fits all” Logbook Requirement on nuclear facilities. Nuclear facilities already document far more than any other steam station, but not necessarily in the form envisioned by the proposed Logbook Requirements.

SCE does not maintain its logs at San Onofre in the manner proposed by the Logbook Requirements and to do so could be in conflict of how we comply with NRC requirements, or at a minimum could require us to maintain an additional set of

logbooks. We have attempted to list a few of the conflicts which could result at a nuclear facility if the proposed Logbook Requirements were imposed on us.

1. The Logbook Requirements requires both electronic and hardcopy formats for 10 years. SCE did not keep electronic logs 10 years ago and so we can not retroactively comply with this requirement. The hardcopy logs should be sufficient. SCE logs are stored on microfiche, which is neither electronic or hardcopy. SCE would prefer the requirement be that the logs be stored in two separate places in either electronic or hardcopy media.
2. The Logbook Requirements require the SS LOG (which we would call the SM log) to be an overall facility record. The SM log at SONGS Units 2/3 has overall responsibility for Unit 1 but does not maintain an SS log for Unit 1. That is kept separately. It does not identify all the operating personnel on shift. That record is kept by the NOAs in a separate program. It does not record all communications with outside entities. Many other groups communicate with outside agencies constantly. These include the NRC, OES, FBI, Marine Corps, and etcetera. There is no way the SM log will document all of these communications.
3. The Logbook Requirements would require midnight entry of kV and Mega VAR readings. It would require identifying the type of fuel we are using and its availability. It would require logging AGC status as well as environmental monitoring requirement. That is simply impractical at SONGS. We have many environmental monitors and we always use uranium fuel which we only refuel every two years.

4. The Logbook Requirements would impose large, costly additions to what is currently recorded and maintained in our nuclear facility logbooks. For example:
- a. We don't log the status of environmental constraints.
  - b. We do log important equipment out of service but not all equipment.
  - c. The midnight entries do not reflect all outstanding work authorizations.
  - d. The midnight entries do not document status of facility demineralizers.
  - e. The midnight logs do not document on hand quantities of consumables.
  - f. The first entry in the CO log identifies some of the people taking over the new shift but does not include the details required by this draft.
  - g. The CO does not log starts and stops of all equipment but does log major equipment changes.
  - h. The CO does not log every load increment during startup. After a refueling the Unit will startup at 3% per hour so it will take well over a day to get to full power in small increments.
  - i. The CO log does not include all work authorizations issued and released nor the reason for the work.
  - j. The CO log does not log all equipment declared out of service.
  - k. The CO log does not log the results of performance tests.

This is only an indication of the many issues posed by the proposed Logbook Requirements.

As a Participating Generator under the CAISO, SCE's San Onofre Nuclear Generating Stations (SONGS) is required to submit to the CAISO, among other things, (a) an annual proposed maintenance plan updated quarterly each January, April, July and October, (b) written notification of any known changes to the outage plan, and (c) immediate notification of any forced outages. SCE believes that other than the filings to be made of nuclear facilities to the CAISO and CPUC, the Committee should exempt nuclear facilities from the proposed Logbook Requirements.

**B. Hydro**

The Committee must recognize that the proposed Logbook Requirements should not apply to federally licensed hydro-electric facilities. The Committee should interpret the statute in a manner that results in fair non-redundant logbook requirements while still achieving the objectives of the statute and of the Commission. SCE believes the application of the proposed Logbook Requirements to FERC licensed hydroelectric facilities must be limited to the same type of reporting and notification requirements applicable to nuclear plants in recognition of FERC's exclusive jurisdiction under Part I of the Federal Power Act ("FPA").

SCE requests the Committee to promulgate the Logbook Requirements in a manner that recognizes FERC's jurisdiction over the operation of FERC licensed hydroelectric projects. The manner and type of requirements included in the proposed Logbook Requirements is overly broad and burdensome and would require a massive undertaking to comply, particularly when many of the SCE's facilities are less than 10MW<sup>1</sup> and are operated in a manner consistent with the size and availability.

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<sup>1</sup> 61% of SCE's hydro plants are less than 10MW.



To mandate the compliance with the Logbook Requirements for the dozens of FERC licensed hydro projects, including the many small facilities, is not only overly burdensome, but exceedingly costly, and in the end does not achieve the objectives of either SB-39xx or the Committee. SCE believes that the appropriate application of the Logbook Requirements for FERC licensed hydroelectric facilities must be limited to the reporting requirements similar to nuclear generating facilities. SCE would provide the Committee, the Commission, and the Oversight Board the same outage planning information it currently provides the CAISO and any other information we provide pursuant to the CAISO Outage Coordination Protocol.

SCE believes the proposed Logbook Requirements would not be applicable to FERC licensed-hydro facilities. The Requirements were written and designed to serve as an oversight tool, to be certain that large oil and gas fired generators are properly maintaining and operating their facilities. The Logbook Requirements do not crossover to small FERC-licensed, utility owned hydro facilities. SCE has listed a few of the inconsistencies that evolve from imposition of the Logbook Requirements on a hydro facilities:

1. At SCE Big Creek hydro facility we have a station logbook at each plant and at the Dispatcher Office. SCE does not have shift supervisors and as such has no need for Shift Supervisors log books. The logs in the station capture events pertinent to the operation of that station and cover the items in the Draft Logbook Requirements in section II B. that are germane to Hydro. The Hydro Station operators' log covers events in the plants as they affect operation of the project as a whole and covers some of the Logbook Requirements in section II A. that pertain to Hydro.
2. The Equipment Out of Service log is covered in the abnormal status sheets in the plant log and/or in Hydro Station operators' log. The

Work Authorizations are captured in the station logs for station equipment and in the Hydro Station operator's log for project equipment (tunnels, dams, etc). There is no need for additional logbooks in each of the hydro facilities and the existing SCE logbooks provide generally what the Committee requires.

3. Other inconsistencies between existing hydro facilities and the proposed Logbook Requirements.
  - a. SCE hydro has no shift supervisor logs, but does use the Control Station log book.
  - b. SCE hydro log books are hard copy only.
  - c. In the midnight status log SCE does not record MVAR. We do not record expected return dates of equipment, only the date taken out of service.
  - d. At shift change the operator coming on shift is logged in. The person going off shift is logged off. They all are the same classification. They indicate status by initialing any outstanding clearances of the Control Station.
  - e. Being a run of the river operation, SCE does not record changes in KW/MW output.
  - f. SCE does not maintain off day ahead of schedules but we do report what generation is expected for the Region.
  - g. SCE records in the log if the water flow is restricted for any reason.
  - h. SCE records outages and returns of generation equipment into our Hydro Operator data base which shows the times on and off and the reason for any given situation.

- i. Most of the information pertaining to steam operation does not apply to Hydro facilities.

Although Section 761.3 does not explicitly address FERC-licensed hydroelectric projects, the Committee should nevertheless implement and interpret the statute in a manner that preserves its intent, which was to gain some control over the large gas fired generation that was manipulating the system to drive up electric prices. Accordingly, SCE submits that the Committee must implement Section 761.3 in a manner that recognizes FERC's jurisdiction over the operation and maintenance of FERC-licensed hydroelectric projects. It would be inconsistent with the intent of Section 761.3 to mandate nonconforming Logbook Requirements upon FERC-licensed hydroelectric facilities. FERC-licensed hydro must be limited to similar notification and reporting requirements applicable to nuclear generating facilities and any Logbook Requirements should be hydro specific, recognizing the size and manner of operation.

### **C. Mohave**

SCE owns the majority interest (56%) in an out of state coal-fired generating station (Mohave) and SCE is the operating agent for that facility. SCE would first note that Mohave is located in Nevada and, therefore, is outside the scope of PUC Code Section 761(3).<sup>2</sup> However, because Mohave delivers power into the CAISO, SCE believes it is important to raise several issues with the Committee.

The Committee should adopt Logbook Requirements that afford sufficient flexibility to allow the generating facility to provide the Committee and the CPUC

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<sup>2</sup> SB39(xx) Section 1.(a) and 1.(b) also see SB39(xx) Legislative Counsel's Digest (1)... "This bill would establish the California Generation Standards Committee, to adopt and revise standards for the maintenance and operation of facilities for the generation of electricity in California." (emphasis added)

the appropriate information without creating undue burdens on the individual generating facilities. For example at Mohave:

1. The Mohave Shift Supervisor log and the CO logs are electronic; however the Clearance Log is only paper with carbon copy. If the Committee mandates both hard copy and electronic format requirements, Mohave will need to develop a new computer program to handle the activity. Also, we do not make hard copies of the electronic logs. Our requirement is that we perform regular back ups to CD Rom. The back up creates a new file and does not write over the old one. In this manner, if someone should go back and make a change to the electronic version at a later date, we would have several historical files we could review to see what and when changes may have been made. All Mohave logs are currently kept for life of the facility.
2. Mohave is in Nevada and as such is not within Cal OSHA jurisdiction.
3. Mohave has a chemistry lab and the technicians keep a detailed database of all their readings. We do not currently log all the water chemistry data into the CO logs.
4. Mohave does not log environmental limits at midnight. Under the current operating requirements, Mohave is limited to 375 six minute periods in excess of 30% opacity per quarter. Mohave also has annual Nox and So2 limits that are tracked by the environmental department and the status is not logged at midnight.
5. Many other variations exist between the proposed Logbook Requirements and Mohave's current practices, such as:
  - Retention basin status is logged daily on the RCRA form and not on the midnight log.
  - Mohave currently captures all consumables except hypochlorite.

- Environmental equipment out of service would be carried forward everyday but not on the midnight log.
- Mohave only reports starting and stopping of large equipment, not every piece of equipment.

There are many other small variations between the Logbook Requirements and SCE's Logbook practices. The Committee needs to make their Logbook Requirements general in nature, not specific and mandatory. The purpose at the end of the process is to be able to follow the day to day plant operations to ensure that the generating facility is maintaining and operating the facility in a reasonable and prudent manner.

### **III.**

#### **CONCLUSION**

For the reasons set forth herein, SCE urges the Committee to move forward with the adoption of the proposed Logbook Requirements with care so as not to create problems and issues that either could or should be avoided. Nuclear units under NRC jurisdiction and hydro units operating under a FERC license must be exempted from strict compliance with the proposed Logbook Requirements except for limited filing requirements. The Requirements must be broad enough to provide the necessary flexibility to meet the logbook requirements of a diverse resource base which will even include renewable resources.

Respectfully submitted,

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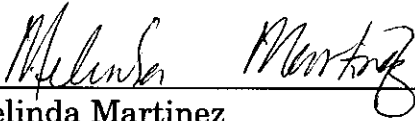
February 24, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE PROPOSED GENERATING FACILITY LOGBOOK REQUIREMENTS on all parties identified on the attached service list. Service was effected by one or more means indicated below:

- Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail);
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand to the offices of each addressee (Via Courier);
- Transmitting the copies via facsimile, modem, or other electronic means (Via Electronic Means).

Executed this **24th day of February, 2003**, at Rosemead, California.

  
\_\_\_\_\_  
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**R.02-11-039**

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