

UTILITY WORKERS UNION OF AMERICA

LOCAL NO. 246 AFL-CIO

10355 LOS ALAMITOS BOULEVARD • LOS ALAMITOS, CALIFORNIA 90720-2190
(562) 594-8881 • 1-800-228-2998 • FAX (562) 594-0829



November 14, 2012

Via U.S. Mail and Email

Pete Dietrich
Senior Vice-President/Chief Nuclear Officer
San Onofre Nuclear Generating Station
AWS Bldg.
P.O. Box 123
San Clemente, CA. 92672

Subject: San Onofre Unit 2 restart

Dear Pete:

The Union has reviewed the information that was provided by Mr. Gary Zwissler in his November 5, 2012 letter concerning the planned reductions of 241 UWUA represented employees at the San Onofre station. Local 246 and its membership remain concerned that the reductions will have an adverse effect on the safe and effective operation of the San Onofre station, including the safety of the employees themselves. SCE has identified significant reductions, some in critical classifications, at San Onofre but does not explain how it plans to safely operate the San Onofre facility with the reduced staffing. Additionally, there has been no indication on how SCE plans to proceed with training the employees that remain to perform jobs of the classifications that are being eliminated or significantly reduced. All of this leads to the conclusion that the plan was driven by a spreadsheet mentality rather than a careful, thoughtful plan to safely and effectively restart and operate the plant. Until SCE presents a detailed plan explaining how it will ensure that the remaining employees will have the training, expertise and experience to safely and effectively restart and operate the plant, either the layoffs or the restart should be deferred.

OPERATIONS

There are now approximately 174 UWUA represented employees in the operations department; SCE intends to reduce that number by 78 employees a reduction of approximately 45%. The reduction includes 30 primary and 24 secondary plant equipment operators. It also includes 11 non-licensed control operators, 3 assistant control operators (reactor operators), 6 nuclear operations assistants and 4 emergency services officers (fire fighters).

Plant Equipment Operators

Of the 174 UWUA represented employees in the operations department, there are approximately 108 primary and secondary plant equipment operators; eliminating 54¹ of these positions equates to a 50% reduction in the classification. The nuclear plant equipment operators monitor the operation of the plant, remove equipment from service for maintenance and return equipment back to service when maintenance is complete. In addition, the nuclear plant equipment operator is the pool that provides candidates for the nuclear control/reactor operator position.

San Onofre already has significant challenges in meeting the maintenance work schedule with the current complement of 108 nuclear plant equipment operators. That challenge will greatly increase if that workforce is cut in half. In addition, it would also likely impact the ability of operations to monitor the plant since the nuclear plant equipment operator is the classification responsible for performing that work. The Union is not aware of any plan to ensure that half as many people can perform the work that is already a challenge to complete with a full complement of employees.

Non-Licensed Control Operators

Of the 174 UWUA represented employees in the operations department, there are 11 non-licensed control operators. These non-licensed control operators plan and prepare the tag out procedures to remove equipment from service for maintenance and subsequently returning equipment to service after the maintenance. Currently there are 11 non-licensed nuclear control operators at San Onofre; and the plan is to eliminate all 11 positions. The employees currently in this classification have performed this work for a significant amount of time, in some cases decades. Planning and preparing the tag out procedures is a complicated and critical process. Any errors in this process can have severe nuclear safety, radiological and industrial safety consequences. Mr. Zwissler indicated in his letter that the job of preparing the tag out procedures post reduction would be delegated to nuclear control operators. This demonstrates the poor planning underlying these massive layoffs.

The primary responsibility of nuclear control operators is to monitor and manipulate the controls of the nuclear reactor. In addition, they instruct the nuclear plant equipment operators to implement the tag out procedure that the non-licensed control operator has prepared. In some cases they may do some minimal modifications to the tag out procedure, however, most of the nuclear control operators do not have the same experience or knowledge in preparing the tag out procedures as the non-licensed control operators.

Eliminating the non-licensed control operator position could increase the likelihood of significant errors occurring in the tag out process. The Union is not aware of any plan to ensure that nuclear control operators can safely and effectively perform the tag out procedures without affecting their primary responsibilities after all of the 11 non-licensed operators are laid off.

There are currently 3 assistant control operators at San Onofre, all of whom would be laid off. The assistant control operator classification is an NRC licensed reactor operator position whose primary function is to monitor and manipulate the controls of the nuclear reactor. Mr. Zwissler

¹ 30 primary plant equipment operators and 24 secondary plant equipment operators.

indicated in his letter that the job duties of the assistant control operator would be performed by the nuclear control operator (along with the jobs of the 11 non-licensed control operators). Currently there are approximately 50 nuclear control operators. While the job duties of the assistant control operator can be performed by the nuclear control operator, it is obviously shortsighted and wasteful to eliminate the position of the assistant control operator. It normally takes 3-5 years of intensive training to obtain a NRC reactor operator license. It is a rigorous program that has a high drop-out rate and costs the ratepayer a significant amount of money to train and qualify these individuals. In addition, there will be too few nuclear reactor operators if the plan to add the duties of the non-licensed operators are also added to the existing duties of the licensed operators. We are baffled and concerned by the thinking that concludes that at this critical and demanding time for San Onofre, SCE would dramatically increase the demands on the licensed reactor operators.

Nuclear Operations Assistants

Unfortunately, the misguided thinking does not end here. SCE plans to eliminate all of the nuclear operations assistants. These people ensure there is sufficient staffing of operations personnel to operate the plant, that all NRC required training and medical requirements are up to date and that all qualifications for emergency response personnel are current. They ensure that NRC work hour rules are followed to prevent operator fatigue and perform the job function as shift communicators during an emergency event to ensure off-site agencies are notified of the event. Mr. Zwissler has indicated the duties of the nuclear operations assistant will be performed by the nuclear plant equipment operator and the office assistant 2 classification. No information was provided on any additional training for the nuclear plant equipment operator or the office assistant 2² that would perform the nuclear operations assistant job function after the business transformation, and no indication that SCE has thought about how half as many equipment operators could absorb double their existing work along with the work of the nuclear operations assistant.

The nuclear operations assistant duties require a high degree of expertise and knowledge of NRC requirements to ensure the operators are qualified to perform their duties in operating the San Onofre station. In addition, their duty as shift communicators, require they remain available 24 hours a day, 7 days a week in case of an emergency. The skill and competencies of the job require a dedicated individual to perform these critical duties. The Union believes that delegating the duties to other classifications on a part-time basis that do not have the proper training and dedication will lead to significant problems with the NRC and may reduce the margin of safety at the station. Again, it appears that the planning was slipshod, if there was any planning.

Emergency Services Officers

The emergency services officers (firefighters) respond to fires, hazardous material spills and medical emergencies. The emergency services officer is also qualified as an emergency medical technician (EMT). Currently there are approximately 16 qualified fire fighters; the planned

² Currently there are 89 office assistant 2 positions but as part of the business transformation they will be reduced by 46 positions

reduction of 4 firefighters equates to a 25% reduction. The Union believes that the remaining 12 positions will be insufficient to allow the quick response to problems at the station and could have a significant impact on the margin of safety at San Onofre. The Union is not aware of any transition or change management plan to deal with these issues.

MAINTENANCE

Currently there are approximately 290 UWUA represented employees in the San Onofre maintenance department; SCE intends to reduce that number by 84 employees a reduction of approximately 29%. The reduction will be accomplished by combining classifications³ and eliminating or reducing other classifications.

Nuclear Maintenance Machinists, Boiler and Condenser Mechanics, and Maintenance Welders

The existing nuclear maintenance machinist, nuclear boiler and condenser mechanic, and nuclear maintenance welder classifications will be combined into a new classification the nuclear mechanical technician. There are currently 75 employees in nuclear maintenance machinist, nuclear boiler and condenser mechanic and nuclear maintenance welder classifications. The combination of these classifications will result in a reduction of 10 positions; the planned reduction equates to a 13% reduction. No information was provided by Mr. Zwissler on what additional training employees in the nuclear mechanical technician classification would receive in order for them to perform jobs in the expanded classification.

The classifications of nuclear maintenance machinist, nuclear boiler and condenser mechanic and nuclear maintenance welder are highly skilled craft classifications. Employees in these positions have spent years honing their skills in order to perform their job functions. The Union believes that combining classifications without sufficient analysis as to the effect of the combination could have consequences that would be detrimental to the margin of safety at San Onofre. Additionally, as mentioned previously, San Onofre has significant challenges in meeting the maintenance work schedule with the current complement of maintenance employees. The Union believes a reduction in these classifications will further exacerbate our problems with meeting maintenance work schedules. The safe and reliable operation of San Onofre requires that any repairs be promptly addressed. Delays in repairing components at the station would have a detrimental impact on the operation of the plant. The Union is not aware of any transition or change management plan to deal with these issues.

Nuclear Maintenance Crane Operator

The classification of nuclear crane maintenance operator is being eliminated. Currently there are 8 employees in the classification all of whom would be laid off. Nuclear crane maintenance operators operate the cranes at the San Onofre station to lift loads of significant size and weight. They must maintain state required certifications to operate the cranes necessary to perform their job function. These positions are highly skilled and highly trained and require extensive

³ This is information that was provided in Mr. Zwissler's letter and is not a waiver of the Union's position that combining or creating classifications is a subject of bargaining.

certifications. The Union believes eliminating these positions could place employees and the station at significant risk. Mr. Zwissler did not provide any information on who would perform the work of this classification after the business transformation. The Union is not aware of any transition or change management plan to deal with these issues.

Nuclear Maintenance Painter

The classification of nuclear maintenance painter is being eliminated. Currently there are 14 employees in the classification all of whom would be laid off. Nuclear maintenance painters provide and apply coatings to plant components to protect them from the salt air environment. Employees in this classification require the skill and knowledge of dealing with hazardous coating, both in the application and disposal of the coatings. The San Onofre station and its components are susceptible to continuous degradation from exposure to the salt air environment. Preserving components is critical to ensure the reliable operation of the station. Eliminating the nuclear painter position will reduce the reliability of San Onofre. Mr. Zwissler did not provide any information on who would perform the work of this classification after the business transformation. The Union is not aware of any transition or change management plan to deal with these issues.

Nuclear Computer Technician

The classification of nuclear computer technician is being eliminated. Currently there are 10 employees in the classification all of whom would be laid off. Nuclear computer technicians repair and update software programs for the plant monitoring system, the reactor Core Operating Limit Supervisory System (COLSS) and the core protection calculators.

The plant monitoring system and the COLSS system are critical systems that the reactor operators and senior reactor operators depend on to monitor the safety parameters of the reactor. The COLSS system also provides alarm function when reactor parameters are approaching or have exceeded the limits specified in the plant technical specifications. The nuclear computer technicians have extensive training and experience performing this work.

Mr. Zwissler's letter indicated that the work of the nuclear computer technician would be performed by the nuclear controls technician and the senior nuclear controls technician. The nuclear controls technician and the senior nuclear controls technician training and experience pertains to pneumatic and electronic controls and does not include computer and software training. Mr. Zwissler did not indicate in his letter what additional training the nuclear controls technician or senior nuclear controls technician would receive to perform the work of the nuclear computer technician. The Union believes nuclear controls technician and the senior nuclear controls technicians do not have the training or experience necessary to perform the work of the nuclear computer technician. The Union is not aware of any transition or change management plan to deal with these issues.

The critical nature of the computer systems that monitor the reactor require that we have highly trained employees dedicated to performing the work on these computer systems.

The Union believes the elimination of the nuclear computer technician could pose a significant nuclear safety risk.

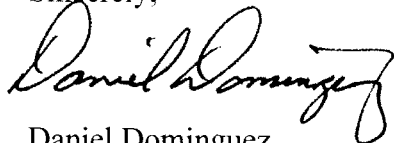
Other Positions

There were additional classifications in maintenance, radiation protection, chemistry, engineering, project management and site support services that were being reduced or eliminated, however, there was insufficient information for the Union to make a determination on the impact to the operation of San Onofre. We are in the process of requesting additional information regarding these classifications in order to determine the effect of the reductions on the operation of San Onofre.

CONCLUSION

The Union and its members continue to have concerns regarding the impact of the planned reduction of UWUA represented employees would have on the safe operation of the San Onofre station. Additionally, it appears that there has been insufficient planning or steps taken to mitigate or prevent problems that could result because of the reductions. We understand in making the determination for the employee reductions that SCE has benchmarked other nuclear plants on their staffing levels, however, none of the benchmarked plants face the significant challenges that San Onofre faces with their steam generators. Until SCE presents a detailed plan explaining how it will ensure the remaining employees will have the training, expertise and experience to safely and effectively restart and operate the plant, either the layoffs or the restart should be deferred.

Sincerely,



Daniel Dominguez
Business Manager
UWUA, Local 246

CC: Ron Litzinger
Ted Craver
Doug Bauder
Michael Langford
Marc Joseph
Pat Lavin
Carl Wood
Jerry Acosta