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Appendix F

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Marine Safety Plan

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SECTION FOURTEEN - MARINE SAFETY PLAN

14.1 Overview

This Marine Safety Plan (MSP) has been developed specifically to support the marine operations that will take place in dispositioning the SONGS 1 intake and discharge conduits. The purpose of this plan is to provide a precise set of procedures and protocols that will be used by the APC when executing the marine portions of the dispositioning work. The primary concerns addressed by this MSP are personal safety, environmental safety and vessel safety. The final draft of this plan, to be provided with the final work execution plan just prior to the start of offshore work, will address applicable permit conditions and marine mammal monitoring requirements.

14.2 Plan Elements

This MSP is composed of the following elements:

- Distribution of MSP
- Training and Implementation
- Marine Project Location
- Marine Operations Protocols
- Critical Operations and Curtailment Plan
- Marine Communications Plan
- Marine Transportation Plan
- Navigational Marking and Lighting Plan

14.3 Distribution of MSP

This MSP will be distributed to all pertinent regulatory agencies, the U.S. Coast Guard Group San Diego, the SCE Project Manager, the APC project manager, all environmental monitors, all APC marine foremen, and APC support vessel operators and radio operators. In addition, a copy of this MSP will be placed on each support vessel utilized in this project.

14.4 Training and Implementation

The APC project manager, APC field supervisors, and agency environmental monitors will review the contents of this MSP at a pre-dispositioning kick-off meeting that will take place after the environmental permits have been issued but before any marine field work takes place on this

project. Pertinent comments or suggestions made during this kick-off meeting may be inserted into revised versions of this MSAP. A final draft of this MSP will be produced and included in the final Work Execution Plan that will be produced and approved by the California State Lands Commission prior to start of onsite work.

14.5 Marine Project Location – USCG Jurisdiction

The marine dispositioning work will take place offshore of the SONGS 1 just south of San Clemente, California. The marine activities will take place as far as approximately 3,200 feet offshore of the coastal facility and as nearshore as 5 feet of water. This work site is well removed from any ship traffic areas but may be accessed by commercial fisherman and recreational boaters. This offshore work site is exposed to open ocean swells and may experiences heavy sea states and surf during the fall, winter, and spring months or during storm events that come ashore from the southwest. The water visibility at this site is generally in excess of 5 feet during the summer months.

The U.S. Coast Guard controls the marine work site. The marine work site is not a U.S. Coast Guard Vessel Traffic Service area and there are no restrictions on vessel operations or vessel anchoring at this site. However, the marine work site is within a U.S. Coast Guard special security zone and requires notification to and permission from the U.S. Coast Guard to work at this site.

14.6 Marine Operations Protocols

The following operational protocols are intended for use by the APC offshore crews during the marine dispositioning work. The purpose of these protocols is to provide a precise set of operational requirements and duties that will ensure that all marine operations are conducted safely.

14.6.1 Pre-Dispositioning Notification

APC will notify the U.S Coast Guard Group San Diego in writing 15 days prior to the start of offshore operations at the site. This will provide written notification of the project start date and the intent to conduct marine operations at the site. With the exception of the filing of the Local Notice to Mariners and daily security clearances, no other notifications will be given.

14.6.2 Daily Security Clearance

APC will notify SCE on a weekly basis, or more frequently if necessary, of the marine operations taking place at the offshore work site. SCE or APC will notify the U.S. Coast Guard on a daily basis of the marine operations taking place at the offshore work site.

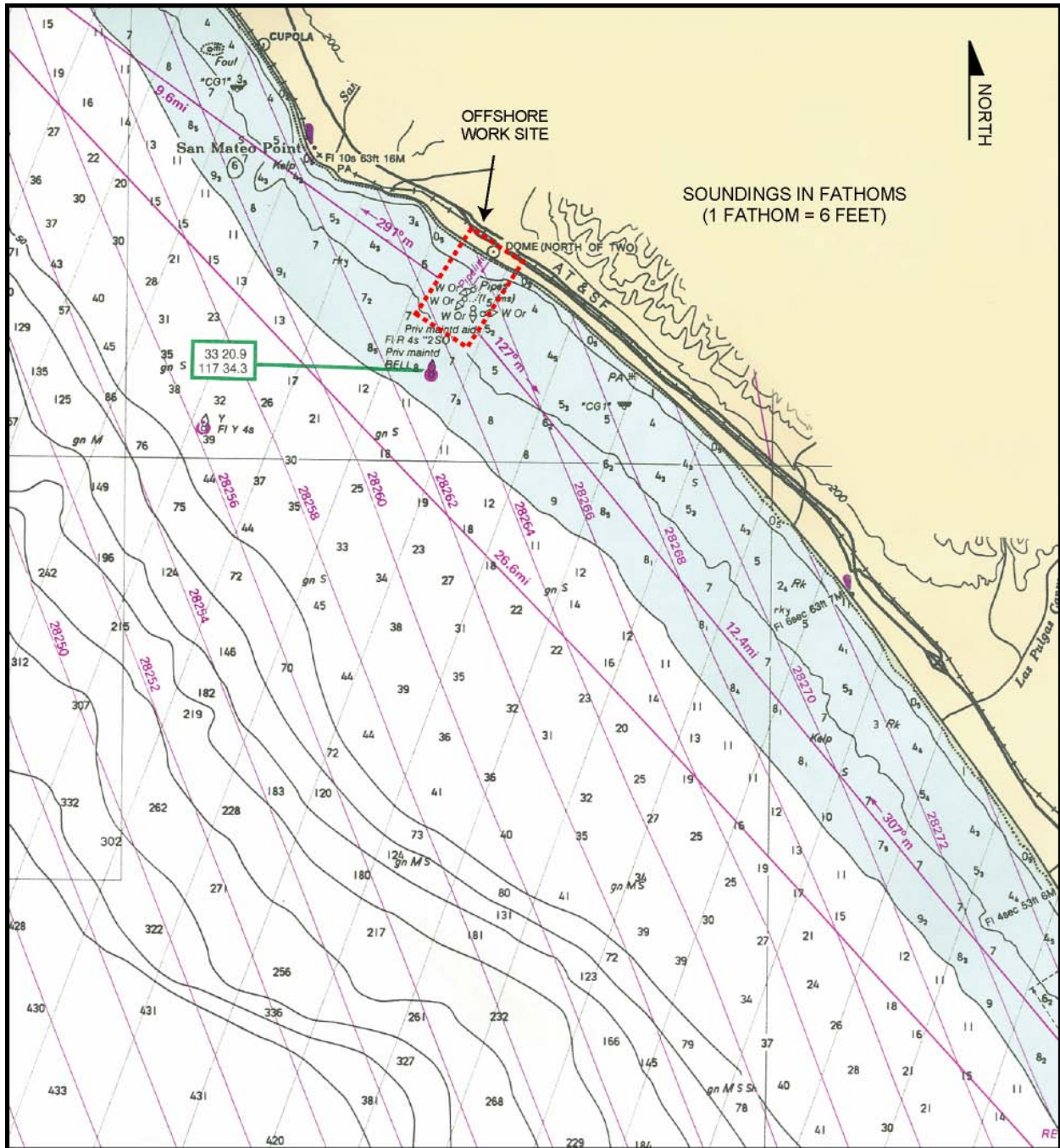


Figure 14-1 Nautical Chart of Marine Work Site

14.6.3 Contact with Commercial Fishermen or Recreational Boaters

In the event commercial fishermen or recreational boaters approach the offshore work site during periods of dispositioning operations, APC will notify the boaters by radio of the operations and required safety clearances. In the event commercial fishermen or recreational boaters violate the minimum safety clearances, APC will shut down its marine operations until the safety hazard has been remedied. The U.S. Coast Guard may be called for assistance, if necessary.

14.7 Critical Operations and Curtailment Plan

Following are critical operations and planned responses specific to this project:

14.7.1 Qualified Individual

The qualified individual for this project shall be the APC Project Manager. Contact information for this individual is provided in the Contact List located in Section Three of this Work Execution Plan. This individual has the ultimate responsibility and authority for maintaining a safe offshore work site and responding to any oil spills or other emergencies.

14.7.2 Offshore Safe Working Conditions

Unsafe sea states are any sea states or weather conditions that create unsafe working conditions for personnel or equipment.

Response: In the event of unsafe sea states or weather conditions, the APC project manager will shutdown or not permit any operation that effected by these conditions. In addition, APC will maintain a third-party professional marine weather forecaster to provide the project with daily weather and sea state predictions. These forecasts will have a 5-day look-forward report as well.

14.7.3 Offshore Refueling

The support vessels and equipment mounted on the deck of the derrick barge or support vessel will require periodic refueling. As with any refueling requirement, the possibility of spillage exists.

Response: All refueling of support vessels will take place at the shore base or at approved fueling docks. Refueling of the equipment mounted on the deck of the support barge will take place from integral fuel tanks built into the support barge, or from deck

mounted fuel totes. If necessary, U.S. Coast Guard approved fuel totes will be used and transported to site where they will be placed on the deck of the support barge with the derrick barge crane. No cross-vessel refueling will be allowed. All refueling operations will follow U.S. Coast Guard regulations and oil spill containment equipment will be onsite in accordance with the Oil Spill Contingency Plan contained in this project description.

14.7.5 Rigging and Lifting Operations

This project will require extensive rigging and lifting of heavy objects. Rigging failure or dropped loads could create hazards to personnel and equipment.

Response: All critical rigging and lifting requirements will be pre-determined and pre-planned. Critical rigging and lifting requirements including lifting of the surf sled vehicle, pulling of the surf sled vehicle, rigging and lifting of the MAPS riser structures, rigging and lifting of the velocity cap sections, and rigging and lifting of the VCTS riser sections. All of these lifts will be engineered and all rigging will be specified in task-specific rigging and lifting plans.

14.7.6 Anchoring Operations

Anchoring operations present special safety hazards to the offshore crews as well as other boaters who pass through the marine site during anchoring operations.

Response: All anchoring operations will take place as specified in the attached Anchoring Plan. All anchors will be flown to their respective locations and lowered in place via each anchor's crown line. No anchors will be allowed to drag on the seafloor. All anchor handling crews will be trained and experienced in operating the anchor winches, flying anchors to location, releasing anchors, and recovering anchors. Anchor setting operations will not commence or will be halted, if already started, until all commercial or recreational boaters are clear of the marine work site.

14.7.7 SSV Beach Winch Operations

The surf sled vehicle will be pulled to the nearshore I-1 and D-1 MAPS locations with a beach winch during the course of the MAPS disposition operations. The beach winch will be established on the beach just west of the seawall and footpath. A soft-line hawser will be used to the winch the SSV shoreward. The hawser could present a tripping hazard to members of the public crossing the beach, as well as a hazard to boaters who attempt to cross over it and become fouled in it.

Response: Onshore, APC will station two beach security personnel on either side of the hawser as it crosses the beach. In addition, the beach will be closed off with stakes and warning tape at each end of the beach in front of SONGS 1. Warning signs will also be posted at either end of the beach, in English and Spanish, advising the public that the beach is closed (except the public access walkway between the northern State Park and the southern State Park), and the hazard source. All pull operations will be halted if members of the public enter the beach and come within 200 feet of the hawser. Offshore, the hawser will be marked with orange plastic buoys every approximately 50 feet to mark the hawser. These beach winch pull operations will also be noticed in the Local Notice to Mariners.

14.7.8 SSV Storm Contingency

Storm surf could damage the SSV and cofferdam when operating in the nearshore environment.

Response: In the event of predicted storms, or in the event of high surf, APC will pull the SSV onto the beach until the storm passes or surf subsides. The SSV will be pulled back offshore to its worksite by the SSV support vessel and the pull back wire.

14.8 Marine Communications Plan

This marine communications plan will be used by the marine work vessels to communicate with each other, to communicate with vessel traffic in and around the marine work site, and to communicate with the U.S. Coast Guard and SCE SONGS security.

14.8.1 Work Site Radio Communications

Radio communications will be conducted using VHF-FM marine band radios. The marine work crews will monitor channels 11 and 16.

14.8.2 Cellular Telephone Contact

The APC Project Manager, the APC marine foreman, and other APC operators or managers will be available by cellular telephone. These individuals and their contact numbers will be found in the Contact List that will be included in Section Three of the Work Execution Plan.

14.9 Marine Transportation Plan

The offshore operations will be supported by a derrick barge, a tugboat and a crewboat. Additional vessel support may include a deck barge and a deck barge tugboat.

14.9.1 Derrick Barge – D/B JC Freese

The derrick barge will be towed to the marine work site from Morro Bay, California. The transportation route will be a coastal route that culminates in the San Pedro Channel. After arriving onsite, the derrick barge will remain moored offshore until its work is complete.

14.9.2 Tugboat – T/B Moe

The tugboat will be used to tow and tend the derrick barge. The tugboat will tow the derrick barge to the marine work site and then standby with the derrick barge at the marine work site. The tugboat will also be used to set and retrieve the derrick barge anchors and to provide support vessel services to the marine field operations as needed. The tugboat may also be used to ferry light equipment and supplies from the local APC shore base.

14.9.3 Crewboat

A crewboat will be employed by APC to haul APC personnel to and from the local APC shore base on a daily basis. The crewboat will travel the most direct route between the marine work site and the selected local shore base.

14.9.4 Deck Barge and Support Tugboat

A deck barge and support tugboat may be used to transport recovered materials to the APC Long Beach shore base. APC plans on providing this deck barge at the end of the project to transport all recovered materials in one load.

14.10 Shore Bases

APC intends to establish and utilize the following shore bases to support the project:

14.10.1 Long Beach Shore Base

APC anticipates establishing a shore base somewhere in Long Beach, California. The exact location has not been selected at the time of this writing. However, this location will

provide dockage for offloading support vessels and barges, and dock space for temporary storage or processing of recovered materials.

14.10.2 Local Shore Base

A local shore base will be established at Oceanside Marina or Dana Point Marina for departure and landing of crews, light equipment and supplies for the offshore operations. The exact location has not been selected at the time of this writing.