



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

APR 26 2002

Harold B. Ray, Executive Vice President
Southern California Edison Co.
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: MEETING SUMMARY FOR END-OF-CYCLE PERFORMANCE ASSESSMENT

Dear Mr. Ray:

This refers to the end-of-cycle performance assessment meeting conducted at the San Clemente Inn, San Clemente, California, on April 16, 2002. Enclosed are the meeting attendance list; a copy of the slides presented; a letter from Patricia Borchmann to Breck Henderson, dated April 16, 2002, with an attachment from San Luis Obispo Mothers for Peace; a message from the Coalition for Responsible and Ethical Environmental Decisions, with 10 practical protective actions; and general public questions and concerns.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/nrc/adams/index.html> (the Public Electronic Reading Room).

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

A handwritten signature in black ink that reads "Claude E. Johnson".

Claude E. Johnson, Chief
Project Branch C
Division of Reactor Projects

Dockets: 50-361
50-362
Licenses: NPF-10
NPF-15

Enclosures:

1. Attendance List
2. NRC Presentation
3. Letter from Borchmann to Henderson
4. Message from Coalition for
Responsible and Ethical
Environmental Decisions
5. General Public Questions and Concerns

cc w/enclosures:

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San Juan Capistrano, California 92675

George Scarbrough, City Manager
City of San Juan Capistrano
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San Juan Capistrano, California 92675

Mike Parness, City Manager
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Dana Point, California 92629

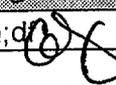
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Dana Point, California 92629

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Presidio of San Francisco
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 DRP Director (KEB)
 DRS Director (ATH)
 Senior Resident Inspector (CCO1)
 Branch Chief, DRP/C (CEJ1)
 Senior Project Engineer, DRP/C (vacant)
 Staff Chief, DRP/TSS (PHH)
 RITS Coordinator (NBH)

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RIV C DRP/C	C DRP/F	Signature		
CEJohnson; d 	KMKennedy 	CEJohnson 		
4/26/02	4/26/02	4/26/02		

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax

END-OF-CYCLE MEETING ATTENDANCE

LICENSEE/FACILITY	Southern California Edison San Onofre Nuclear Generating Station
DATE/TIME	April 16, 2002; 7:00 p.m.
LOCATION	San Clemente Inn Meeting Room 2600 Avenida del Presidente San Clemente, CA 92672
NAME (PLEASE PRINT)	ORGANIZATION
PATRICIA Borchmann	(None) - AM JUST A CONCERNED CITIZEN
Billie Sumner Lovmark	concerned
Wes Lovmark	Ret USMC
EUGENE CRAMER	Self
Marilyn J. O'Brien	American Association of University Women
Ronald R. August	AAUW
Lawrence R. McKeough	City of San Clemente Emergency Planning Officer
Joan Dice	AAUW-
Jimmy Nichols	AAUW
DAVID CONNOLLY	SHARE HOLDER
Tom McCreless	RET. USNRC.
BOB FISHER	
Stephanie Dorey	San Clemente City Council

END-OF-CYCLE MEETING ATTENDANCE

LICENSEE/FACILITY	Southern California Edison San Onofre Nuclear Generating Station
DATE/TIME	April 16, 2002; 7:00 p.m.
LOCATION	San Clemente Inn Meeting Room 2600 Avenida del Presidente San Clemente, CA 92672
NAME (PLEASE PRINT)	ORGANIZATION
Steve Setherby	snetherby@aol.com
Wayne Lohyk	
DIANE THOMAS	AAUW dylthomas@earthlink.net
STEPHANIE THOM	CONCERNED CITIZEN
Sheryl Lindsey	City of Dana Point
BARBARA FOX	SC
Russell Hoffman	Self
Jim DRAKE	NRC RIV
Marc Roddin	Self
CRAIG BEAUCHAMP	CREED
John Dorey	Self

END-OF-CYCLE MEETING QUESTION & ANSWER SIGN UP

LICENSEE/FACILITY	Southern California Edison San Onofre Nuclear Generating Station
NAME (PLEASE PRINT)	TOPIC
✓ PATRICIA BOPPELMANN	PUBLIC SAFETY, THE PUBLIC INTEREST
✓ Karen Speros	Public Safety, ^{Citizen's Oversight Committee} ^{Paladium} ^{Isotope table}
✓ BILL SPEROS	Public safety ^{distribution}
✓ GENE CRAMER	Response
✓ Ray Swanson	Fuel Storage & future plans.
✓ Bob Lindgren	Public Safety
✓ Richard Andersen	Personnel Testing
✓ Stephanie Dorey	Public Safety
✓ STEPHANIE THOM	SAFETY ISSUES
✓ Sharon Hoffman	Lack of safety
✓ Russell Hoffman	Safety issues
✓ DON MAY	(LACK OF) SAFETY ISSUES
✓ Blanche Thomas	Specific re-material discussed
✓ Paula Hayward	Provisional lumber appearing at Gate agreed. // // at San Onofre Freeway off-ramp

END-OF-CYCLE MEETING QUESTION & ANSWER SIGN UP

LICENSEE/FACILITY	Southern California Edison San Onofre Nuclear Generating Station
NAME (PLEASE PRINT)	TOPIC
✓ BARBARA FOX	AIR SPACE SAFETY
DON MAY	SAFETY SPOKE ON PG 1.
✓ RICARDO NICOLO	STORAGE, SEISMIC ETC.
Karen Speros	Safety, Citizen Oversight Comm., Patricia Jodie
PATRICIA BOCHMANN	
✓ Steve Nethony	Location
✓ Frank E Denison	Melt Down
✓ Lyn Harri Harris	security
✓ Craig Beauchamp	Shoreline protection
✓ SUS BROWN	SOURCE OF CONSULTANTS (SEISMIC)
John Dorcy	Inspection issues
Wayne Keshyt	" "

LEFT

ANNUAL ASSESSMENT MEETING



**Nuclear Regulatory Commission
Region IV**



Meeting Guidelines

- **Meeting with Southern California Edison Company**
- **Inform Public of Plant Performance**



NRC Meeting Guidelines

- **Registration Table**
- **Questions and Answers**
- **Handouts**
- **Feedback Forms**



Meeting Agenda

- **Regulatory Oversight**
- **Findings and Assessments**
- **Additional Focus Areas**
- **Questions and Answers**



NRC Personnel

Kriss Kennedy Chief, Branch F
Division of Reactor Projects

Claude Johnson Chief, Branch C
Division of Reactor Projects

Clyde Osterholtz Senior Resident Inspector
San Onofre Nuclear
Generating Station

John Kramer Resident Inspector
San Onofre Nuclear
Generating Station



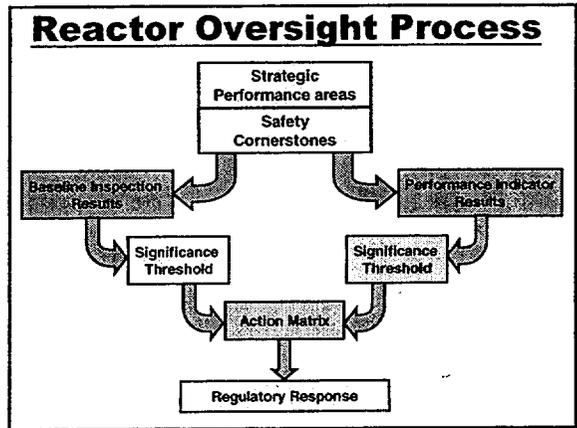
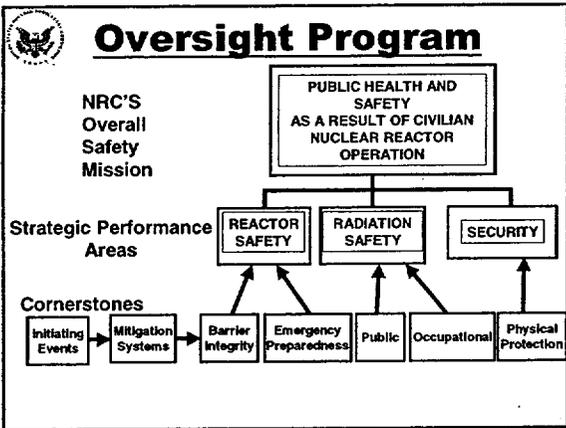
SCE Introduction

NRC Performance Goals

- Maintain safety and protect environment
- Enhance public confidence
- Improve
 - Effectiveness
 - Efficiency
 - Realism of processes and decision making
- Reduce unnecessary regulatory burden

NRC Oversight Activities

- Provide assurance plants are
 - Operating safely
 - Complying with regulations
- Based on a logical and sound framework
- Objective indicators of performance
- Assessment program triggers regulatory actions



Reactor Oversight Process

SAFETY SIGNIFICANCE

GREEN	- very low
WHITE	- low to moderate
YELLOW	- substantial
BLACK	- high

■ Headquarters - 1626
 ■ Regional - 2787
 ■ Resident - 2006



Baseline Inspection Program

- Gathers objective evidence of plant safety
- Conducted at all plants
- Focuses on safety-significant
 - Systems
 - Components
 - Activities
 - Events



Event Follow-Up and Supplemental Inspections

- Review events for significance
- Follow-up significant inspection findings
- Determine causes of performance declines
- Provide for graduated response



Resident Inspectors

- Live in Community
- Stationed at Plant
- Prompt Response Capability



Regional Inspectors

- Specialized
- Team Inspections
- Reactive Inspections



Inspection Program

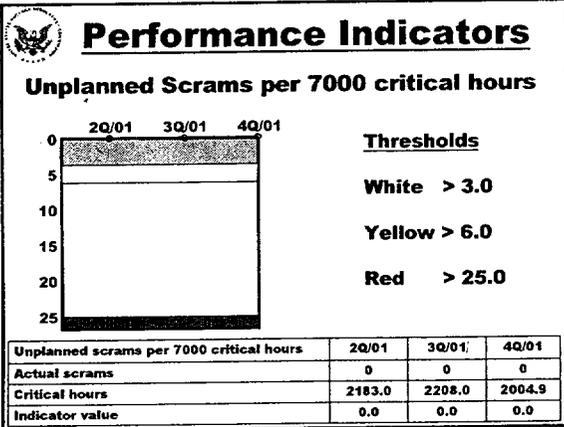
- Inspection reports describe inspection activities and findings
- Inspection reports are publicly accessible

www.NRC.gov/reading-rm/adams.html



Performance Indicators

- Provide objective measures
- Indicators for all Strategic Areas
- NRC verifies through inspections



Performance Indicators

Performance indicator results and other assessment information available on the NRC's public web site

www.NRC.gov/NRR/OVERSIGHT/ASSESS/SANO2/sano2_chart.html

www.NRC.gov/NRR/OVERSIGHT/ASSESS/SANO3/sano3_chart.html

-
- Assessment Program**
- Objective review of licensee performance
 - "Action Matrix" to determine agency response in three areas
 - Inspection
 - Management Involvement
 - Regulatory Actions
 - Plant specific assessment letters
 - Information on NRC public web site

Plant Safety Performance Summary

-
- Inspection Results**
- Inspection findings were of very low safety significance
 - No special or supplemental inspections necessary

Performance Indicators

All performance indicators within the Licensee Response Band



Assessment Conclusion

- **SCE effectively managed**
 - Reactor Safety
 - Radiation Safety
 - Plant Security
 - **Strategic Area Objectives Met**
- SONGS operated in a manner that protected the health and safety of the public**



SCE RESPONSE



Additional Focus Areas

- **NRC Responds As-Needed**
- **Mandated Licensee Actions**
- **Implemented Emergency Response**



Nuclear Industry Issue

- **Reactor Vessel Head Penetration Inspection**
 - NRC Bulletin 2001-01 "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles"
- **Security at Nuclear Power Plants**
 - Substantial security measures in place prior to terrorist attacks
 - Federal, State, Local and Licensee integrated response to terrorist threat



Summary

- **Comprehensive Oversight Program**
- **San Onofre Nuclear Generating Station maintained public health and safety**
- **Capability and resources to respond and impose additional requirements**



Contacting the NRC

- **Report an Emergency**
(301) 816-5100 (collect)
- **Report a Safety Concern**
(800) 695-7403 or Allegation@nrc.gov
- **General Information or questions**

www.nrc.gov

Select "What we do" for Public Affairs



**SCE CLOSING
REMARKS**

Q's and A's



**Nuclear Regulatory Commission
Region IV**

2nd draft final
April 16, 2002

Patricia Borchmann
176 Walker Way
Vista, CA 92083

Breck Henderson – Region IV
Randy Hall – Spent Fuel Project Office
Nuclear Regulatory Commission
Washington DC 20555-0001

RE: Comments/Questions for Public Meeting by NRC/SCE for review of security breaches/public safety threats during period reported from 04-01-01 to 12-31-01.

I'd like to submit this in an essay form, in it's entirety to NRC officials here tonight, and officials from Southern California Edison, who is the Licensee for San Onofre Nuclear Generating Station, commonly known as SONGS Units 1, 2 and 3.

Since the limit for public speakers to present specific questions/comments is very brief, I know that my podium time limit would not permit that I present these comments orally in their entirety. So I'll try to summarize.

My first comment is on **THE BURDEN OF PROOF.**

In this case, based on my perception as a concerned citizen living in southern California, it seems that the entire burden of proof (to prove that the "public health, safety and welfare can be fully maintained" for citizens in southern California, the State, and beyond even State borders, and even US borders) has been grossly misplaced.

The burden of proof has been inappropriately placed on the citizens, members of the Public. Yet, it is the duty of Nuclear Regulatory Commission and the Licensee, Southern California Edison, to fully prove that "the public health, safety and welfare can be fully maintained". That is the the burden of proof, as I understand the existing Rules which regulate activities by both employees of the NRC, and activities/permits regulated by NRC, and permits held by Licensees.

As understood, the burden of proof is set by specific standards under 10CFR, Section 72.212, which specifies an entire spectrum of specific technical studies a Licensee must be developed and provided to NRC, as a basis upon which NRC could consider in developing a Certificate of Compliance for a certain cask design for dry cask storage of spent fuel. That's what I understand the rules say, as I, or any reasonable citizen would also understand.

Yet, the timeframes for accepting Public Comment to NRC on the current proposed Rulemaking to add NUHOMS 24PT1 casks to the already approved list of cask designs and fabricators in the United States will expire April 29, 2002. NRC has rejected my earlier request to extend the Public Comment period, until the entire scope of technical

studies and analysis required under the 10CFR, 72.212 Report Requirement are complete, and made fully available to the public.

Yet, as understood, neither NRC has these reports, or has SCE even likely prepared them yet or hired consultants to prepare them, and even if they existed and were in the possession of SCE, the Licensee would not be compelled to make them fully available to the public, because they are treated as "proprietary" information, belonging only to the Licensee.

To me, there's seems something drastically wrong with the existing Rules, and the existing system.

My short question for NRC and SCE tonight is - Please respond and confirm just what is the burden of proof for both the regulatory agency NRC, and the Licensee Southern California Edison (SCE)?

Is that burden based on "reasonable doubt", or "preponderance of the evidence", or any other usual evidentiary standard?

If not, why not?

And why are the burdens of proof for the regulatory agency and utility so small, and the burdens of proof for the citizens in the local area of impacts, and the State so high, and why has that burden reversed?

In my recent experience communicating with officials at NRC at many levels, asking questions, and getting answers from NRC, and asking more questions about the last response, I've uncovered what appear to be some major gaps, in the existing rules, and NRC's role as a regulatory agency, and the burden of proof that "the public health, safety and welfare of the public" will be fully maintained.

I cannot merely wait to Petition under section 2.208 of existing rules, to reform the rules. There isn't time.

In the meantime, I understand from officials at NRC, that the current work schedule for Southern California Edison (SCE) is to start pouring concrete pads for the proposed NUHOMS 24PT1 casks in April 2002. Although I have already asked, for a reply from Southern California Edison (through messages with spokesperson Ray Golden), there has been no reply yet. That's why I'd like to ask for reply from Southern California Edison tonight.

It's time to stop this runaway train. It's entirely premature, and not only foolish from the financial/economic stability for citizens in the State, it's extremely dangerous. The risks from spent fuel either in pools, or in dry cask canisters are tremendous and catastrophic (Footnote 2), and casks have not yet ever been proven capable of safely storing HLRW

for the entire lifetime that casks and canisters may be required to store spent fuel.
(Footnote 1).

Also, I'd like both the regulatory agency (NRC) and the Licensed utility (SCE) to go on record at this Public Meeting, and respond to this citizens' demand to affirmatively KNOW, the spent fuel to be stored onsite at San Onofre in proposed dry casks will be temporary, or will it, or could it become permanent.

While the recent drama and dialogue with the regulatory agency has been interesting, I also find it is very disturbing, and frightening. The reality doesn't seem to quite match up with press releases, and articles published, where employees of the regulatory agency are often quoted, saying things like after the recent Davis-Besse plant near catastrophe, reassurances that "everything's just fine", we're doing a top-to-bottom review of our own internal procedures, and all permit activities of Licensees in the U.S., and there's not anything removed from the table."

Well, take this letter, and the concerns I have, and the concerns of many technical experts in the scientific community, and the many physicians in the health care and medial fields, concerns by public employees who work in the emergency response roles, including firefighters who don't have all the proper training and equipment to respond to a radiological emergency at San Onofre Nuclear Generating Station.

Put this on the table at NRC and SCE. These are not being put into the public record for the purpose of "scare tactics" (although a reasonable person should be scared). The purpose of entering these comments into the public record is to further advance the public interest, and elevate the public's awareness, and my every effort to cause truth to be revealed.

Cease and desist any all additional construction, concrete pouring for pads at San Onofre for dry cask storage of spent fuel immediately.\

Cease and desist continued operation of Units 2 @ 3, and generation of more lethal waste, which further compounds problems, and unanswered questions and myths about "safe storage" of spent fuel, either in pools, or dry cask storage containers/casks, including the proposed NUHOMS24PT1 proposed for use at San Onofre Nuclear Generating Station (SONGS).


Patricia Borchmann

Attachments:

1. draft letter dated 04-16-02 from San Luis Obispo Mothers for Peace (by permission from Rochelle Becker – SLO MFP 04-15-02)
2. article by J. Alveraz, published in January/February 2002 Bulletin for Atomic Scientists/Physicists, titled "What about the spent fuel?"

SAN LUIS OBISPO MOTHERS FOR PEACE
PO 164
Pismo Beach, Ca 93448

Nuclear Regulatory Commission
Office of Secretary
Washington, DC 20555-0001

(draft dated 04-16-02
W/permission by Rochelle Becker)

COMMENTS OF THE SAN LUIS OBISPO MOTHERS FOR PEACE
REGARDING THE LICENSE APPLICATION OF
SOUTHERN CALIFORNIA EDISON REGARDING THE
STORAGE OF HIGH LEVEL RADIOACTIVE WASTE

The San Luis Obispo Mothers for Peace (SLOMFP) strongly oppose the storage of high-level radioactive waste onsite at the San Onofre Nuclear Generating Station (SONGS). We have thoroughly researched the licensee's application and segmented our responses by topic. The SLOMFP find the following issues remain unaddressed or inadequately answered by the licensee or the Nuclear Regulatory Commission (NRC):

SEISMIC

- 1) A thorough and independent study must be requested and completed by USGS on seismic information brought to the NRC's attention in a 2.206 Petition filed (date) by Ms. Patricia Borchman. The SLOMFP feel compelled to remind the NRC that the last time seismic issues were not independently verified by an independent agency in our state, the ratepayers of California were saddled with \$2 billion of additional costs at the Diablo Canyon project.
- 2) Did the NRC retain independent experts to analyze seismic issues for SONGS proposed HLRW site? If so, where are the results of that independent verification located for public review? If not, how can you guarantee the public that Edison's proposed HLRW site is not subject to earthquake degradation?
- 3) Have seismic issues regarding an earthquake during transfer of radioactive fuel from pools to casks, from casks to transportation modes been addressed? If so, where is this analysis to be found? If not, how can the NRC guarantee that Edison's proposed HLRW site will not be subject to earthquake damage during transfer of fuel from pools to casks and from casks to transportation vehicles?
- 4) All future NRC/Edison meetings regarding HLRW storage on site or the transportation of irradiated fuel casks offsite must be held near the area of impact (San Clemente or Oceanside).
- 5) While bolting NUHOMS casks to the pad may prevent tipping, what will keep the concrete pad from cracking leading to possible offsite radioactive exposure?

The San Luis Obispo Mothers for Peace recommend that no NUHOMS cask be brought onsite at SONGS, much less loaded with HLRW, until all the above points have been addressed by the NRC.

CASKS

- 1) Who has approved cranes, other moving equipment, and casks at the NRC? What independent verification process was used?
- 2) What has been changed in the NRC's independent verification process for the proposed NUHOMS casks, while onsite for 10-100 or more years, to assure the residents who live by SONGS that the following will not occur:

a) In 1993, the NRC certified the VSC-24 cask design even before issuing its Certificate of Compliance. Over a dozen of these casks had been loaded and utility employees had noticed bubbles in the "spent" fuel pools during these loadings, yet had failed to understand that they were flammable hydrogen gas and did not report them to the NRC.

b) In 1996 a ventilated VSC-24 storage cask holding 24 pressurized water reactor irradiated fuel assemblies exploded in the reactor at Point Beach, WI. A two ton shield lid was dislodged several inches on the edge of the storage pool. Although first year chemistry students are aware that zinc plus acid generates flammable hydrogen gas this possibly was missed with nearly catastrophic results. This cask system had NRC approval, but the unforeseen chemical reaction had been missed by the cask manufacturing company (Sierra Nuclear Corporation based in CA), the utility and the NRC. In January 2002 welders at Point Beach did not follow procedures. "Control wires for the automatic welding system got hung up on the vent and purge manifold of the cask and caused the automatic welder to slow down and deposit excess wire into the weld area. Due to the inattentiveness of the welders, this eventually pulled the welding machine off its track. The weld torch went into the weld, which melted the torch cup into the weld"¹. So the welders put the welding on auto-pilot and went off to do who knows what. After the welding machine literally crashes and burns the NRC concludes that the cask team demonstrated a thorough understanding of the procedures.²

c) Unfortunately, a three year halt on the loading of VSC-24 in the US so that the NRC could investigate the confusion, inadequate testing and poor quality control of the manufacture did not result in a safer cask.

d) In 1999 at the Palisades nuclear plant the VSC-24 cask that had been used at used at Point Beach, experienced two hydrogen burns. The NRC thinking all was in order had gone home for the day, when a welder ignited a "burn" but did not report it, which led inevitably to a welder on the next shift ignited a second "burn". Days passed before the NRC was notified. A week later, a suspicious

¹ NRC Report

² Union of Concerned Scientist memo 2/19/02

fired in the dry cask storage administrative office trailer destroyed many documents, including those of the recent "burns". In 2001 Palisades officials admitted to the NRC that the very same irradiated fuel that was involved in the hydrogen "burns" had actually cooled for less than five years in the storage pools. It had been cooled less than 5 years and been unevenly distributed between a number of casks. No NRC violation was issued.

e) In early 2000 at the Trojan nuclear plant in Oregon the cask loading of the VSC-24 type cask had to be suspended when so many hydrogen bubbles were generated in the fuel pool that workers could not see well enough to complete the job.

f) Over the past several years the NRC has identified serious problems in other dry cask systems. Three NUHOMS casks, manufactured by VECTRA Technologies and fully loaded at the Davis-Besse nuclear plant in Ohio, were discovered to have been built below technical specifications. This is the same plant that had a near meltdown last month when a 6" hole was discovered....

g) In May of 1995 a loaded TN-40 cask became stuck in the hoisted position above the Prairie Island reactor's irradiated fuel storage pool for 16 hours. This incident occurred just after the NRC had granted Northern States Power (now Xcel Energy) an exemption from regulatory requirements for reviewing cask loading procedures.

h) In January 2000, the NRC reported that a Transnuclear TN-32 cask containing 32 irradiated fuel assemblies at the Surrey nuclear plant in Virginia had developed 6" long cracks in its outer concrete shield, loose welds, and a helium leak.

i) In May 2000, the NRC discovered unreported flaw with the neutron shielding material supplied to New Jersey-based cask manufacture Holtec International. Holtec hopes to deploy no less than 4,000 Hi-Storm dry casks for use at the proposed Private Fuel Storage on an impoverished Indian Reservation in Utah. The Holtec Hi-Storm cask is being proposed for Diablo Canyon's high level radioactive waste storage.

j) In April of 2001 the Sacramento Municipal Utility District (SMUD) halted loading its first Transnuclear West NUHOMS dry cask storage cask at the Rancho Seco reactor due to an unexpected mishap. A faulty O-ring leaked air underwater in the irradiated fuel storage pool during loading operations, threatening to contaminate the fuel-holding inner canister with radioactive pool water.

k) In August of 1994 Consumers Energy, which had assured a federal court judge that its casks could be safely reopened after loading, discovered that its 4th VSC-24 dry cask had weld flaws. When the 400 degree Fahrenheit cask was reintroduced back into the 100 degree Fahrenheit pool water would result

in a radioactive steam flash hazardous to workers, and would thermally shock the fuel assemblies threatening to further degrade them. Also, the welded-shut inner canister would have to be cut open in a timeframe of less than 50 hours. In addition there was not procedure yet developed to remove steel shims that were pressure fit inside the cask lid. Seven years later the defective cask still sits fully loaded on the Lake Michigan shoreline, alongside 17 more fully loaded VSC-24's.³

2) The public must be assured that the NRC's rush to license ISFSI's around the United States to meet the needs of a growing number of utilities whose irradiated fuel pools are reaching capacity. The NRC must guarantee the public that the following will not occur if NUHOMS casks are allowed for storage of high level radioactive waste at SONGS:

- a) design flaws
- b) vents cut off from air flow due to debris
- c) faulty parts and equipment
- d) cracking
- e) casks will not be approved without the NRC's Certificate of Compliance
- f) no exemptions from NRC policies will be granted to any casks or cask siting, loading, transferring or transportation procedures.

3) Is there video footage demonstrating an actual fuel removal into NUHOMS casks at any other nuclear facility? If so, where can the public view a copy. If not, we request that one be required and sent to all communities that will use NUHOMS casks to store high-level radioactive waste onsite for 10-100 years, if not permanently.

4) All information demonstrating the NUHOMS casks are capable of withstanding 7.5 magnitude earthquake should be made available to communities within a 50 mile radius of SONGS. This request includes the NRC's independent verification of Edison's studies on this issue.

5) What state of the art testing has been done to assure residents within 50 miles of SONGS that NUHOMS casks chosen for storage of high-level radioactive waste to be stored at SONGS can withstand earthquake, faulty welds, corroded welds, fuel leakage, and/or terrorism for 10-100 years, if not permanently?

6) Our understanding is that Castor casks are the safest cask available today (although they are not certified to withstand terrorist acts such as 911. Why is it that residents of Southern California (a known seismic zone) do not deserve to have Edison provide the safest cask technology available?

7) How will damaged fuel assemblies will be handled at SONGS. What independent verification has the NRC done to assure Southern California residents that this is the safest method of handling damaged fuel assemblies and where can the public view this independent verification?

8) What risk analysis studies did the NRC do to assure that HLRW at SONGS will be safely transferred to barges, trains and/or trucks for eventual transportation. If no risk analysis was done one must be completed before HLRW is allowed to be transferred from irradiated fuel pools to NUHOMS casks, much less transferred to transportation modes.

- 9) If this is to be "temporary" storage of HLRW, why has Edison applied to construct a site to hold (?) casks (each containing 28 fuel assemblies) instead of just what is necessary to empty spent fuel pools when they are full in 2007?
- 10) The NRC has issued a report admitting that irradiated fuel assemblies can still spontaneously combust even after cooling 5 years in pools. What assurance Southern California residents have that fuel being transferred into dry casks has been cooled for the minimum 5 years?
- 11) The NRC must demonstrate that a Edison's proposed HLRW storage casks can be safely opened after loading, if necessary, before allowing the cask to be filled with radioactive waste.
- 12) Casks are licensed (approved) for 20 years, which is the criteria that must be met. But many utilities, including Edison, have stated in their applications that the casks may remain onsite for up to 100 years. Without the 103 communities that contain nuclear power plants, working with the nuclear utilities and the federal government to find a REAL solution to the production of HLRW, it is likely that this lethal material will remain on our coastline forever.
- 13) The design basis for the proposed casks must be verifiably certified to withstand 911 style terrorist attack (a minimum of one kiloton). To our knowledge NUHOM casks do not meet this criteria.
- 14) Southern California officials must demand that any casks stored on our coastal bluffs be hard covered and sunk to meet the same criteria as nuclear weapons in missile silos.
- 15) No casks have been tested for their anticipated lifetime onsite at nuclear plants.
- 16) At Maine Yankee the residents have sued the NRC for failing to provide adequate protection, demanding that the nuclear plant stop producing waste and move the vulnerable spent fuel into the containment building.
- 17) We will urge that Southern California representatives demand that Edison use the safest design of dry casks for its storage. We understand this is the Castor cask, but even this cask may not be able to withstand a 911 design basis attack.
- 18) Southern California does not need to rush to meet either Edison's or the NRC's timetable, all oversight and approval agencies must take the appropriate time to assure that the health, safety, property values and economic prosperity of our state is protected before any license to store HLRW is granted or a recommendation for transportation out of away from SONGS is passed.

The San Luis Obispo Mothers for Peace recommendation is that NUHOM casks not be allowed unless it meets the criteria to withstand a 911 terrorist attack. Furthermore all questions regarding independent verification of any dry cask system used be addressed by the NRC.

COSTS

- 1) What are the actual costs to ratepayers of licensing, siting, constructing, providing security for a HLRW storage site at SONGS?

TRAINING

- 1) How does training for SONGS employees at the proposed ISFSI differ from training & indoctrination for HLRW sites?
- 2) Number of additional personnel necessary to prepare for ISFSI
- 3) The application states "() will participate in the initial development and presentation of the supplemental training material" As (-----) obviously has a vested interest in this training an license process, who independently verifies that NRC criteria has been met and that safety will be assured?
- 4) How does this training differ from nuclear plants that have had problems in constructing, operating, and transferring of irradiated fuel at other nuclear plants? For example, the welding procedure issues at Point Beach, WI

The San Luis Obispo Mothers for Peace recommend that all training of personnel be reviewed and independently verified by experts outside the cask designers and the utility.

PROPOSED TRANSPORTATION TO ULTIMATE STORAGE DESTINATION

- 1) What agency approves transportation methods? How are transportation methods independently confirmed to be safe? For instance in late March a truck hauling radioactive waste blew over in Wyoming. This was supposedly due to high winds. What would happen in an earthquake? Are high winds considered when licenses for transport are granted? If so, how did this happen? If not, why?
- 2) What are the exact proposed transportation route(s) to remove HLRW from SONGS to its ultimate storage site? Have the residents along this route be appraised of HLRW being transported through their communities?
- 3) Will local officials and/or the public be notified when shipments of HLRW is traveling through their communities? If yes, how? If not, why not.
- 4) Number of transportation shipments that will be required to remove (---) casks?
- 5) What is the total population that will be exposed to HLRW casks along the transportation route?
- 6) Transportation of HLRW has been postponed several times since 911 due to possible terrorist threats. How will transportation out of our earthquake prone coastal zone ever be assured by Edison, by DOE, or by the NRC? One shipment, in the planning stages for years, to ship 125 spent fuel rods on a 2,360 mile journey was delayed due to 911. The casks, unable to be certified in temperatures below 10 degrees Fahrenheit had to be removed from the train and stored inside for the winter.⁴
- 7) So far the NRC has approved casks for storage and transportation unable to hold up to wind and temperature, what assures Southern California that Edison's proposed storage/transport casks will ever leave our state? A risk analysis is needed.
- 8) In Haddam Connecticut the nuclear utility has proposed to move the dry casks off site to a different location in the state. What assurances does Southern California have that Edison will not try to move its HLRW to an interior location in our earthquake prone state for permanent storage in order to sell its coastal property

⁴ NIRS Fact Sheet, Kevin Kamps June 2001

and rid itself of liability? And if this occurs what will keep other nuclear plants from sending waste to California?

- 9) The Dept. of Transportation (DOT) Report in January of 2002 stated that "the DOT is not fully prepared" to deal with these types (radioactive waste) of shipments, which are expected to increase in the near future. The (who) recommended that the DOT designate a focal point to timely and effectively address budget, resource, regulatory, coordination, infrastructure, routing, environmental and safety issues that may increase with shipments of nuclear waste."⁵
- 10) If Edison is allowed to continue production for its full license, it is likely that it will begin to dismantle its nuclear plant and spent fuel pools. If that is that case and an onsite dry cask begins leaking and emitting radiation they will be no pools available in which to quickly address this leak becoming a major radioactive catastrophe. "If the pool was still available the cask could be placed back under the water while the damage is repaired or the cask replaced. At present no such contingencies are deemed necessary because the dry casks are considered indestructible. As the owners of the Titanic may have thought, why provide life boats for an unsinkable ship?"⁶
- 11) Has the design basis for the outer cement covering for NUHOMS casks been approved for transportation?
- 12) If Yucca Mountain is unable to open and Southern California Edison, decides to try and send its HLRW to the Goshute Reservation in Utah, and the dry cask is found leaking it will have to be returned to SONGS, as the site in Utah has not pools to transfer the leaking cask for repair or replacement.

The San Luis Obispo Mothers for Peace recommendation is that there should be no transportation of HLRW without limitation or phase out of the production of this radioactive material that remains deadly for tens of thousands of years.

ADVANTAGES/DISADVANTAGES TO SOUTHERN CALIFORNIA

- 1) Property taxes or other funds created and sustained by creation and long-term storage of HLRW
- 2) Jobs created (1 yr, 5 yrs, 10 yrs....)
- 3) Property value decreases (ex. New Mexico)
 - a) In 1992 the New Mexico state Supreme Ct. upheld a lower court ruling that a Santa Fe couple can collect \$337,000 in damages, because the government might haul radioactive waste on a new road that remains on their land. We can only imagine the possible loss of property value to residents of San Luis Obispo County due to storage or transportation of HLRW.⁷
 - b) Additionally homes adjacent to the transportation routes may apply for compensation due to loss property values. The issues of property value

⁵ 2002 American Trucking Associations, Inc

⁶ "Nuclear Disposal Crisis" David Lochbaum, Union of Concerned Scientists 2002

⁷ Albuquerque Journal North, 6/27/92

loss must be addressed in a risk analysis by Southern California's elected officials and all counties along the transportation route.

- c) A poll by Dan Jones and Associates in September 2000 regarding the proposed temporary above ground storage at the Goshute Reservation in Utah, resulted in the following information:
 - 85% of Skull Valley residents were aware of the proposal for Private Fuel Storage to store waste on the Skull Valley reservation
 - 79% of them opposed it
 - 64% stated transportation of waste would have negative impact on residents
 - 64% stated it would have a negative impact on property values
 - 85% stated it would have an impact on whether or not they bought property within a mile of the route and 74% more than one mile.
 - 63% stated it would cause a drop in property values
 - 75% living near the railroad said it would have a negative impact on their ability to sell their homes⁸
- d) 50,000 Coloradoans filed a class action suit against Rockwell International for \$550 million in lost property values.
- e) Lawsuits have also been filed by the neighbors of the Oakridge plant in Tennessee, the Hanford plant in Washington state, and the Mound plant in Ohio.
- f) In 1990 the community around the Fernald plant in Ohio received \$78 million from the government.⁹
- 4) Southern California's elected representatives must demand a date certain that HLRW will be removed
- 5) Southern California residents must be informed that neither homeowners nor health insurance covers problems caused by radiological accidents.
- 6) If the NRC allows Edison to build a HLRW site in our fragile coastal zone without demanding that the utility begin to phase out radioactive producing waste by replacing it with renewable energy sources or increased conservation programs, it will be giving up its power to protect the health, safety and economy of California's citizens now and for generations to come. Once energy is no longer produced at SONGS, Southern California is left with an uneconomic legacy of HLRW.
- 7) X years of energy production at SONGS has produced X tons of highly radioactive spent fuel. If Edison is allowed to continue production of HLRW until 2023 the amount of irradiated in our earthquake prone coastal zone will (triple?) More importantly the increased tonnage of HLRW will likely remain in Southern California for X years after the last kw has been produced and the jobs have been all but eliminated. The time to begin to wean ourselves from this deadly energy source is now. The NRC must seriously consider that Edison cease production of HLRW when the capacity of its current spent fuel pools is reached (2006)

⁸ White paper regarding Opposition to the High-level Waste Storage Facility Proposed by Private Fuel Storage On the Skull Valley Bankd of Goshute Indian Reservation, Skull Valley Utah November 28, 2000

⁹ Nuclear Information Resource Service

- 8) Who will bear the additional costs to Southern California should there be a terrorist attack at vulnerable spent fuel pools, especially after termination of operations at SONGS when irradiated fuel must remain in pools for at least 5 years for cooling?

The San Luis Obispo Mothers for Peace recommend that the health, safety and economic impacts of continued production of HLRW be seriously considered before a license is granted to store HLRW at SONGS for XX years.

EMERGENCY PLANNING

- 1) Updated demonstration of emergency evacuation plans using current state of the art technology in 50 mile evacuation zone. When last updated?
- 2) NRC Criteria for maximum time allowable to evacuate 50 mile evacuation zone
 - a. what traffic speed assumed to meet this time?
 - b. has increase in county population since plant licensing been taken into consideration in this timetable?
- 3) Number of trained emergency workers in Nevada?
- 4) Number of trained emergency workers in Utah?
- 5) Number of trained emergency workers in California?
- 6) What will be the additional costs and requirements of county personnel should there be terrorist attack of vulnerable irradiated fuel pools?
- 7) In Connecticut once a month all television stations go off the air for one hour with the announcement that this is an emergency broadcast check and if this was an actual emergency the appropriate information. A similar monthly announcement should be required at SONGS.

The San Luis Obispo Mothers for Peace recommend that updated training for all emergency personnel in 50 mile evacuation zone and the entire transportation route be verified before any dry cask storage is allowed at SONGS. Monthly emergency broadcast announcements should be aired on radio and television for one hour a month.

SECURITY/TERRORISM-as terrorist have openly admitted nuclear power stations are near the top of their lists as targets for attacks on civilians in the US

- 1) What is the proposed security at HLRW site (both reactor and irradiated fuel pools) when SONGS is operating and after retirement?
- 2) Who will be responsible for security of HLRW, when SONGS is no longer operational?
- 3) On September 13, 2001 (exactly 2 days after 911) PG&E submitted a license request seeking NRC approval to take credit for soluble boron in the spent fuel pools in order to maximally use the existing storage capacity and thus provide spent fuel storage with full core offload capability through approx. 2006. As the public has learned spent fuel pools are extremely vulnerable to terrorism and allowing these pools to maximize capacity only increases that danger. In Jan, 2002, the NRC issued a request for additional information regarding the "Credit

for Soluble Boron in the Spent Fuel Pool Criticality Analysis". This procedure should not be allowed in light of last September's terrorist attacks. **NOT SURE IF THIS IS APPLICABLE TO SONGS**

- 4) Capacity was dramatically increased for these spent fuel pools in the late 1980's. Any further increase in capacity in non-secure pools is irresponsible and undeniably not in the best interest of Southern California residents. **NOT SURE IF THIS IS TRUE FOR SONGS**
- 5) There is information to the effect that the NUHOMS casks (both steel liner and concrete) could be penetrated by 757 and 767 aircraft. How has Edison and the NRC addressed this concern?
- 6) As the (???) casks proposed at SONGS increase terrorists targets by a minimum of (?) football fields, how does Edison and the NRC provide assurance to the public that terrorism cannot occur or cause a radioactive release?
- 7) A September 2000 Report by the National Council on Radiation Protection and Measurements dealing with the threat of nuclear terrorism warns that "Targeting nuclear spent fuel elements kept in a storage facility would be an easier target than an operating plant." A successful attack on such a facility using 1,000 pounds of high explosives could cause radiation contamination over a wide area, the report concludes. How is this concern dealt with in Edison's proposed dry cask storage and the NRC possible approval?

The San Luis Obispo Mothers for Peace recommend that the NRC recognize that HLRW stored onsite on Southern California's coastal zone dramatically increases the risks of offsite radiation from 911 style terrorist attacks and take the appropriate measures to assure the public that dry casks used on site meet 911 terrorism design basis criteria.

HISTORY OF BROKEN PROMISES

- 1) Before songs began operation, Edison made assurances that HLRW would only be stored temporarily on site.
- 2) During NRC hearings for a license extension (or license recapture as the utility prefers to call it), Edison provided testimony that its HLRW would be removed from the SONGS site by (????). Shortly afterward (date) Edison applied for and was given permission by the NRC to double the amount of irradiated fuel it could store in pools on site. **IS THIS TRUE FOR SONGS?**

PHASING OUT NUCLEAR POWER IS POSSIBLE AND NECESSARY

- 1) A review undertaken by the British Cabinet's Performance and Innovation Unit (PIU), and chaired by Brian Wilson, an advocate of nuclear power resulted in a surprise recommendation. Britain's New Scientist magazine lead editorial provided this summary: "The specter of catastrophic climate change is forcing nations around the world to question how they make their energy...Logically, one solution could be nuclear, because it emits no carbon. [But] that logic is flawed...the British governments energy review shows the

cost assumptions of the past were over-optimistic: nuclear power is relatively expensive." The PIU review says that nuclear technology has an "uncertain role since concerns about radioactive waste, accidents, terrorism, and proliferation may preclude its use." It states that the costs of insuring against accidents and disposing of radioactive waste should be born by nuclear stations rather than the government. This would make nuclear even more expensive. Nowhere in the world have new nuclear stations been financed within a liberalized electricity market" the report points out. Rather than nuclear power, the review says that renewable energy is the most flexible way to reduce carbon emissions and recommends producing at least 20% from renewable resources by 2020.¹⁰

- 2) Estimated amount the US spends each year safeguarding oil supplies in the Persian Gulf: \$50,000,000,000
- 3) Estimate value of US crude-oil from the Persian Gulf last year: \$19,000,000,000¹¹
- 4) "...renewables are highlighted in the National Energy Policy for the potential for strengthening America's energy security. Today we are celebrating move a mature, renewable technology from the lab to the marketplace. While renewables remain a small percentage of our electricity generation portfolio, we look forward to increasing this share through continued federal leadership." stated Secretary of Energy Spencer Abraham.¹²
- 5) Southern California has the opportunity to require that Edison phase out and replace all the energy produced at SONGS with a renewable energy source or a more aggressive conservation program in exchange for allowing the storage of HLRW in the Coastal Zone of our state. A precedent for this requirement is the Minnesota case at Prairie Island where a condition of dry cask storage was that Northern States Power (now Exelon) replace some of the nuclear energy produced with wind power.
- 6) "...the disturbing blueprint of terrorist intent which has recently emerged dramatizes that America can no longer afford to contribute to the continued proliferation of nuclear material through the waste generated by electric production at nuclear power plants. Neither can it continue its unprincipled dealings with corrupt governments in order to maintain the nation's access to oil, when safe, cleaner alternatives are both technologically feasible and commercially viable."¹³

The San Luis Obispo Mothers for Peace recommend that the NRC and the State of California require Edison to replace and phase out energy that increases production of high-level radioactive waste with increased renewable sources and conservation technologies ideally before irradiated fuel pools are full in 2006

¹⁰ Timeline March/April 2002

¹¹ Harper's Magazine April 2002

¹² US Department of Energy, <http://www.energy.gov/HQpress/releases01/junpr/pr01104.htm>

¹³ Sustaining Energy Briefing Paper, GRACE Public Fund, December 2001

In conclusion, the San Luis Obispo Mothers for Peace, feel compelled to ask that the NRC and the State of California fully answer, verify and certify all of the above issues before any license to transfer irradiated fuel into dry cask storage that may remain on our earthquake coastal zone for decades, centuries or possibly forever. Our nation has the opportunity to wean itself from finite energy sources that increase greenhouse gases and high-level radioactive waste that will negatively impact our health, safety and economic welfare for generations to come.

Edison, the nuclear industry and the NRC have offered reactor communities across our country a Sophie's Choice for what to do with high-level radioactive waste already sitting in areas that would never meet criteria for permanent radwaste storage. And yet, it is not unlikely that this will be the case. We must move away from this lethal energy source and move towards an energy future that will leave a legacy of which the United States can be proud and lead the world in a cleaner more economic future.

URGENT MESSAGE FROM CREED

Gov. Ridge's Homeland Defense initial plan cites nuclear power plants as "critical infrastructure," and "most vulnerable potential targets."

The message from the White House carried in national media during the recent "credible terrorist threats" specified San Onofre and Diablo Canyon nuclear installations as credible targets. It also included Commander in Chief George W Bush commitment to "do everything I can to protect the people who live near our nuclear power plants."

CREED offers the enclosed ten practical protective actions.

We ask you, our elected official/and /or emergency planning staff person to communicate one or some or all of these action recommendations to our Homeland Defense Director Ridge for consideration in deliberations on the \$billions in funding for homeland protections.

Please send copies of your letters to us. We need to know your response to our plea.

Sincerely,

Lyn Harris Hicks for CREED Focus Committee

These proposals have been produced and released by the CREED liaisons identified here, in consultation with other CREED key leaders, emergency planners and nuclear industry consultants. CREED leaders serve as "liaisons to" and do not "represent" their present or past organizations and governmental entities.

Lois Berg: former San Clemente City Council member and mayor of the City of San Clemente.
Donis Davey: educator; former director of child-education programs of the Ocean Institute, Dana Point
Lyn Harris Hicks: Soroptimist Int'l; former News Editor, Daily Sun Post, Capistrano Bay newspaper
Steve Netherby: community activist; nationally published journalist
Ricardo Nicol: architect; Rotary Club Director; former San Clemente Planning Commissioner
Marilyn O'Brien: educator; president, American Association of University Women, San Clemente-Capistrano Bay Branch, 1972-74, first intervenor organization opposing San Onofre II&III

CREED

Coalition for Responsible and Ethical Environmental Decisions
205 Calle De Anza, San Clemente, CA, 92672 Tel/Fax 949- 492 5078 creedmail@cox.net

RESPONSE TO TERRORIST SAN ONOFRE THREAT

Warning that a terrorist strike on San Onofre's nuclear reactors could lay waste to much of southern California, an Orange County based citizen group proposes 10 protections to guard against terrorist disaster.

CREED (*Coalition for Responsible and Ethical Environmental Decisions*) urges residents of the 50 mile emergency planning zone of San Onofre to request State and Federal Government implementation of the suggested responses. CREED drafted the action items in recognition of:

1. San Onofre/Camp Pendleton, as dual symbol of bin Laden targeted US global military-industrial power.
2. Vulnerability of nuclear plant containment, components and waste facilities. The International Atomic Energy Agency warned that modern nuclear power generating facilities have not been designed to withstand impact of the magnitude of the World Trade Center attack. U.S. Department of Energy calculations of commercial jet impact probabilities concluded that the containment dome would be penetrated, at highest jet speeds, and that jet fuel inside the dome could lead to explosion.

Purpose of these safeguards is to provide reasonable protections for residents and visitors to nuclear power target areas until nuclear electric generation can be replaced by benign power sources. CREED seeks to initiate the process of safe caretaking of thousand-year-lethal nuclear waste now accumulating on the nation's 103 nuclear power sites. CREED calls for citizens, organizations, business and government leaders to work together to achieve these 10 safeguards:

1. **OPEN FEDERAL NUCLEAR WASTE REPOSITORIES TO COMMERCIAL POWER GENERATORS**—now storing thousand-year-lethal wastes from 36 nations—to accept wastes from commercial nuclear power generators in highly populated nuclear reactor emergency zones. Contracts between nuclear power corporations and the federal government provide that the government owns the wastes and will transport and maintain the wastes in "permanent repositories." The government has reneged on this responsibility at San Onofre since the mid-1980s, creating a stockpiling of the hazardous waste.

CREED urges temporary storage in these established repositories, since San Onofre does not meet federal repository requirements, i.e. underground installation, distance from populations, safe seismic zones and remoteness from invasive water sources. Our goal is to reduce the stockpile, on-site San Onofre—vulnerable to terrorist attack—on the relatively unshielded oceanfront, near densely populated areas.

2. **PROMOTE BENIGN ALTERNATIVE ENERGY SYSTEMS** including wind, solar, co-generation, ethanol, co-generation. Avoid vulnerability to skyrocketing energy profiteering and dependency on foreign oil import. **DIVERSIFY ELECTRICITY GENERATION** to reduce terrorist hazards inherent in large, centralized oil and nuclear generation. A project (co-sponsored by CREED) to facilitate purchase and installation of solar roof-top systems to **GENERATE OUR OWN ELECTRICITY ON OUR ROOFS** is promoted by Soroptimist International of Capistrano Bay. Call: 949 492-5078 for information.
3. **REQUIRE LOAD-AND-SHIP OF RADIATED WASTE** Revise California Coastal Commission's, March, 2001, permit that allows stockpiling thousand-year-lethal radiated waste on the San Onofre site—amend to require storage in dry-cask containers outside the coastal zone, and outside high risk seismic areas.
4. **MINIMIZE POTENTIAL FOR TERRORIST DAMAGE TO ESSENTIAL RESOURCES** Spur U.S. Government action to require interim storage of the wastes outside populated areas and remote from reservoirs, major water and oil pipelines, valued croplands, military bases and other prime targets.
5. **STATE LEGISLATURE OR VOTER INITIATIVE TO LIMIT STORAGE OF IRRADIATED MATERIALS ON SITE.** Current California State law requires availability of off-site waste repository before construction of new nuclear power generation facilities. The proposed new law would **ADD TO ANY NUCLEAR INITIATIVE OR STATE LEGISLATION: PROVISION THAT NUCLEAR PLANTS IN CALIFORNIA MAY OPERATE UNDER FEDERAL EXTENSION OR RENEWAL**

PROVIDED PERMANENT REPOSITORY IS AVAILABLE AND THE SITE MEETS NUREG 50-100 POPULATION LIMITS. Patterned after landmark Minnesota Initiative, it should also limit the number of loaded dry casks—and of years they are allowed to remain on site. See: Minnesota Nuclear Initiative on CREED web-page created by Richard Redfield <http://www.nuclearwitness.org/creed.htm> Comments, questions and participation welcomed!

6. Appeal to California environmental Protection Agency, Department of Toxic Substances Control to **DENY or REVISE PERMIT TO STOCKPILE TOXIC CHEMICALS AND IRRADIATED WASTE** (inflammatory and explosive irradiated waste) on the San Onofre site—62,500 gallons proposed.—189 times the 330 gallons that has been estimated by Edison Company spokesperson Brian Metz as the approximate quantity of lethal wastes generated annually by San Onofre.
7. Encourage local pharmacies to carry potassium iodide drops for radiation antidote during a nuclear emergency. Urge California governor and local legislators to **ACCEPT FEDERAL OFFER of POTASSIUM IODIDE**, for protection of residents of the nuclear power plants' evacuation zones.
8. Ask Governor Davis to **REQUEST MARINE CORPS TROOP ASSIGNMENTS TO SAN ONOFRE** to protect San Onofre (perhaps as a training exercise).
9. **FEDERAL AVIATION AUTHORITY DEVELOP PROTECTION FROM AIRBORNE ATTACK AND STRIKES FROM THE SEA** until phasing-out of Units II and III Current FAA 10 mile no-fly-zone and resulting warning time is inadequate. Enforce no-fly and prohibit imposition of new international airport traffic in the 50 mile emergency planning zone of San Onofre. CREED notes that France has installed ground-to-air missile launchers on its nuclear generating sites.
10. **REVIVE THE RECOMMENDATION BY THE SAN ONOFRE STATE BEACH PARK CITIZEN ADVISORY COMMITTEE** (see : Licensing Safety Hearings SOII-III) **TO INSTALL A LOUD-SPEAKER SYSTEM ALONG CAPISTRANO BAY AREA BEACHES** for alert and notify of emergencies— nuclear and other—in the 10 mile San Onofre Evacuation Zone. Creed warns that current sirens are inadequate notification, and that if an attack came during a siren practice day, beachgoers would be on the sand and in the water, without any protection, having been told to disregard the sirens.

CREED declares that the federal government, as it allocates billions of dollars of tax funds for protections from terrorism, should provide some prudent protections for residents and visitors within the 50-mile San Onofre emergency planning zone. President Bush has declared, on national television, "I will do everything possible to protect our citizens who live near nuclear power plants." These Homeland responses to the terrorist threat are certainly possible. Enacted nationwide, where relevant, they would increase the security of millions of Americans who face the potential of a Twin-Tower magnitude conflagration.

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Luis Berg: former San Clemente City Council member and mayor of the City of San Clemente.

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Ricarda Nicol: architect; San Clemente Rotary Club Director; former San Clemente Planning Commissioner

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CREED

Coalition for Responsible and Ethical Environmental Decisions

205 Calle De Anza, San Clemente, CA, 92672 Tel/Fax 949-492-5078 creedmail@cox.net

ENCLOSURE 5

QUESTIONS & CONCERNS

HEAD INSPECTIONS

Citizen feels that only approximately 70 percent of the head surfaces at SONGS have ever been inspected and that both units should be shut down immediately to do a 100 percent inspection of the heads.

Concern about the Davis-Besse issue and the upcoming inspections at SONGS.

DRY CASK STORAGE

Citizen is not satisfied with the rules concerning objections to approval of the dry cask storage facility at SONGS.

CITIZENS' OVERSIGHT COMMITTEE

Citizen is concerned about safety issues and would like to know why we cannot have a citizens' oversight committee.

YUCCA MOUNTAIN WASTE STORAGE

Citizen is concerned about nuclear waste and recommended that all people write their congresspersons to encourage work toward a solution to the waste disposal issue.

Concerned about storage at Yucca Mountain and feels that dry cask storage is necessary, but not at the local plant, beaches, or community.

Person stated that Yucca Mountain would not solve the problem and that we would still have to worry about transportation of the waste. Referred to the number of auto accidents and train derailments.

Are there any federal sites which could be used for storage of waste?

ONSITE WASTE STORAGE

Is the NRC providing the same amount of oversight to the issue of onsite waste storage that they are to the operation of the plant?

FITNESS FOR DUTY

What is the drug testing policy for operations and security personnel?

PLANT SECURITY

Concern about terrorism and the location of the plant in relation to the earthquake fault line, and concerned about planes crashing into the plant.

How can you prevent an individual from stealing a small plane, loading 300 to 400 pounds of explosives on it and flying it into containment?

What changes were made in the plant security plans since 9-11?

Is it possible for a truck loaded with explosives to storm the security gate and reach the plant?

What prevents a small boat from launching a missile at the plant?

A second rail line is planned to run past the SONGS plant, what impact will that have on plant security and access by terrorists?

CREDIBILITY OF SONGS

Person stated they were concerned about the credibility of the SONGS management due to the way they handled the reporting of the fire at the plant.

Individual brought up the issue of a study performed prior to plant startup which addressed impacts on marine biology. Stated that SCE dismissed the study based upon their review of the data.

SPENT FUEL POOLS

Concern about contamination levels of the water in the spent fuel pools.

Individual was concerned about water levels within the spent fuel pools during an earthquake. Related the concern to what happens in a swimming pool during an earthquake.

ACTION MATRIX/INSPECTIONS

Asked if the Action Matrix had been expanded to include emergent events.

How many other noncited violations were identified other than the two examples stated during the meeting and how did they compare in severity?

CONDUCT OF END-OF-CYCLE MEETING

Individual asked why the handouts could not be made available prior to the beginning of the meeting?

Public notices of upcoming end-of-cycle meetings are inadequate.

PLANT EMERGENCIES

What changes in personnel evacuation methods have been made since 9-11?

Individual stated that the freeway system would be unusable in the event of an earthquake and commented on the need to perform an evacuation of the community.

Citizen would like to know if supplies of potassium-iodide tablets could be made available for citizens around the plant.

Concern about seismic activity and effects on the plant.

Individual stated that the seismic risks have increased since beginning construction of the plant.

Why was the monitoring from the incident response center stopped after 3 months?

MISCELLANEOUS COMMENTS

When can this site be dismantled and the area returned to its original condition?

Given the high terrorism threat level and the accessibility of the plant and that the plant is in a highly populated area, could SONGS be licensed under today's requirements?

Who are the NRC's consultants for seismic issues?