

2013 APR 29 PM 12:45

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Apr 27, 2013

Ms Cindy Bladey
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ms Bladey,

The comments that follow are regarding Docket ID NRC20130070.

We ask that the Nuclear Regulatory Commission (NRC) take no action that could lead to a restart of the San Onofre nuclear power plant before the Commission completes a comprehensive investigation and provides full opportunity for public participation and independent expert testimony.

Southern California Edison (SCE) is attempting to shortcut the license review process by calling on the NRC to make a fast-track restart decision. We and other environmental groups have joined with U.S. Senator Boxer and U.S. Representative Markey in urging the NRC not to follow such a course.

We were deeply disturbed when on April 10 the NRC staff disregarded numerous statements of concern and announced a "preliminary finding" that a San Onofre restart at 70% power posed no significant safety risk.

We join a wide range of concerned citizens and public officials in believing that a full and transparent review of the failed San Onofre generators is essential before the NRC considers any potential restart at either partial or full power of the failed generator.

We support Senator Boxer, Chair of the Environment and Public Works Committee, who stated on April 10, 2013: "The NRC staff proposal, which could pave the way for the restart of the San Onofre nuclear power plant before the investigations of the crippled plant are completed, is dangerous and premature."

Given the recent failure of tubes that carry radioactive water, speeding restart of San Onofre through a so-called "license amendment" that shortcuts procedures is totally inappropriate. SCE's request to weaken its license requirements was made despite evidence showing that there could be a significant hazard from the operation of the deficient steam generators.

San Onofre should unequivocally remain Inactive. San Onofre has suffered unprecedented levels of tube damage to its steam generators. Experts disagree with one another as to the cause of the damage, but agree that the reactor's steam tubes will be in danger of bursting in a matter of months.

Given the troubled history and current condition of the plant and the raised level of public concern, the public deserves a full review by the NRC of conditions at San Onofre before it ever considers a restart of either failed generator.

The California Coastal Commission is concerned about the potential damage to sea life. Those studies could ultimately reveal major retrofits are needed at San Onofre.

Another cost is the unresolved issue of where to store the nuclear waste. Thousands of tons of radioactive waste sit on our California coast. The NRC has no plans to get it off our coast, and we've been promised since 1982 that it would be removed to somewhere else "some day."

The absurd cost to redesign the plant's outdated cooling system, to meet new California regulations to protect marine life, will have to be addressed. So far, Edison and the Nuclear Reactor Regulator have failed to resolve the multiple safety issues with San Onofre.

I support the call by the Sierra Club for the NRC to block any restart of the failed San Onofre generators at this time, and to conduct a comprehensive and open review process.

4/16/2013

78 FR 22576

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Template = ADM - 013
E-RIDS = ADM -03

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Thank you for your attention to these concerns.

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