



LARRY AGRAN, Councilmember

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Allison McFarlane
Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16G4
Washington, DC 20555-0001

RE: Docket ID NRC-2013-0070

May 14, 2013

Dear Chairman Macfarlane:

In my capacity as an elected representative of the City of Irvine, I wish to express serious concerns regarding the proposed restart of the severely damaged San Onofre Nuclear Generating Station's (San Onofre) nuclear reactors. In addition, I fully support and agree with the submission made by the Friends of the Earth to Edison's License Amendment Request, including Friends of the Earth's opposition to the Nuclear Regulatory Commission's (NRC) "no significant hazards consideration" determination.

Irvine is a city with more than 225,000 permanent residents and a daytime population of nearly 400,000. Irvine is also only 22 miles away from San Onofre, which is well within the suggested 50-mile evacuation zone should a major nuclear accident occur at the site. Needless to say, with the livelihoods of so many who live and work within Irvine at risk, the ongoing safety proceedings concerning the use of San Onofre are of substantial interest. And given the far reaching consequences of a major nuclear accident, every precaution must be taken prior to restarting either of the damaged reactors, not only for Irvine, but for the nearly 10 million people in Orange, Los Angeles, San Diego and Inland Empire Counties who also live within 50 miles of San Onofre.

Based on the proceedings and evidence presented to date – and the fact that Southern California's energy needs will continue to be met without San Onofre – there seems to be no compelling reason for the NRC to allow Edison to take major safety risks in order to restart an aging, decrepit, and heavily damaged nuclear reactor. At the very least, it is imperative that the public be given a meaningful opportunity to provide input before any decision regarding the proposed restart of either reactor at San Onofre is made.

Despite the well documented and ongoing problems at the San Onofre Nuclear Generating Station, Southern California Edison – the operator of the San Onofre Nuclear facility – has proposed to restart the Unit 2 reactor for five months at reduced power. Yet, I have learned that significant uncertainties concerning the safety of the facility remain. The analyses submitted by Edison's own consultants in support of this restart plan contradict one another regarding the cause of the wear, and indicate that another accident may occur within months. Accordingly, it is unacceptable to put the lives of my constituents at risk when:

(1) the cause of the damage to the facility remains uncertain; (2) the basis for the restart is reliant upon an assumption that this critical equipment will progressively destroy itself; (3) it is unclear whether further degradation of the steam generator tubes will impact the emergency core cooling system; and (4) it is unclear whether the facility, and steam generator tubes in particular, will be able to withstand a significant seismic event.

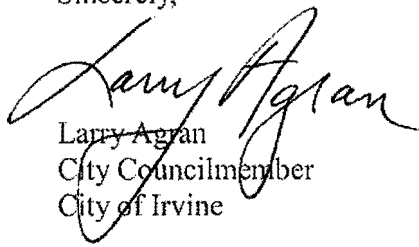
Considering these and other issues, it is troubling that Edison chose to submit a request for a narrow license amendment to the NRC that would relax the rules regarding the integrity of the degraded steam generator tubes, because that is the very issue that led to the unexpected shutdown of the reactors in the first place. This narrow License Amendment Request by Edison ignores the multiple safety issues that can only be addressed in a comprehensive license amendment process prior to any approval to restart the San Onofre reactor.

In addition, it is my understanding that the NRC has already issued a preliminary finding of "no significant hazards consideration," with a final determination to be made some time in the next 5 or 6 weeks. And should the NRC grant a no significant hazard consideration, any public hearing on the merits of the license amendment request will be held after the license amendment has been granted – essentially rendering the subsequent hearing meaningless. In light of the fact that several nuclear experts have raised serious questions about the safety of Edison's proposed License Amendment, a formal hearing process is absolutely necessary to examine the remaining concerns. It is inexplicable how the NRC could have made a preliminary determination based on Edison's own incomplete and contradictory safety analyses.

Finally, all ongoing investigations that are directly related to the replacement of the San Onofre steam generators, in particular the design of the system and cause of the severe wear, must be completed. In this regard, I agree with the views expressed by Senator Barbara Boxer.

In sum, Edison's requests for a narrow License Amendment Request and "no significant hazard consideration" should be rejected. My constituents and the rest of those who call Southern California home deserve the protections afforded by a fair and rigorous hearing that this issue warrants.

Sincerely,



Larry Agran
City Councilmember
City of Irvine

CC: Senator Barbara Boxer
Senator Diane Feinstein
Governor Edmund G. Brown
NRC Commissioner Kristine L. Svinicki
NRC Commissioner George Apostokalis
NRC Commissioner William D. Magwood IV
NRC Commissioner William C. Ostendorff
Eric Leeds, Director, NRC Office of Nuclear Reactor Regulation
Michele Evans, Director, NRC Division of Operating Reactor Licensing

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Joosten, Sandy

From: Larry Agran [lagran@ci.irvine.ca.us]
Sent: Wednesday, May 15, 2013 3:14 PM
To: CHAIRMAN Resource
Subject: Docket ID NRC-2013-0040
Attachments: Comments to Docket ID NRC-2013-0070.pdf

Attached are my comments on Docket ID NRC-2013-0070
Feel free to contact me should have any questions.

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