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Application and Amendment to Facility Operating License Involving Proposed No Significant Hazards Consideration Determination

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Comment On: NRC-2013-0070-0001

Application and Amendment to Facility Operating License Involving Proposed No Significant Hazards Consideration Determination; San Onofre Nuclear Generating Station, Unit 2

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General Comment

I believe that SCE's proposed plan is irresponsible, and shows a serious lack of conservative decision making principles. "Conservative decision making" is a nuclear fundamental that means the safest decisions should always be made to protect the health and safety of the general public, the plant workers, and the environment. If the NRC approves SCE's plan, workers in the Operations Department will be required to start up and run the reactor knowing that the Replacement Steam Generators have extensive design problems and significant wear which could lead to another tube rupture and radioactive release to the environment. As the wife of a reactor operator, I lived through many refueling outages and unit start-ups throughout the 1990's and early 2000's; and I believe that I have a comprehensive understanding of the level of stress that reactor operators experience during normal work conditions. The fact that SCE wants its workers to operate defective equipment shows the flagrant disregard that SCE and SONGS senior management has for the health and safety of nuclear workers at the plant, as well as the people living in the surrounding communities.

The design problems and the conditions which led to the first Steam Generator tube failure in Unit 3 have already been investigated and a root cause analysis has been performed by several industry experts. These analyses confirm that future Steam Generator tube wear and tube ruptures with a resultant radioactive release to the environment are inevitable. Why does SCE need to do a 5 month experimental test run with Unit 2; just to see if the conclusions of the root cause analyses are correct? At what point in time did we decide that doing an experiment with a full scale commercial nuclear reactor was a good idea? What SCE is proposing is unprecedented in the history of U.S. nuclear power. It was an equipment test experiment which led to the nuclear event at Chernobyl in 1986. Didn't we learn anything from that tragedy?

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