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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

Subject: Docket No. 50-361; NRC-2013-0070

I strongly oppose to the request by Southern California Edison (SCE) to amend its license to restart San Onofre at 70% power. SCE's license application claims that "the proposed change will not introduce any significant changes to postulated accidents resulting from potential tube degradation." This flies in the face of both honest engineering judgment and common sense.

During a scheduled replacement of the fuel rods in 2010, the steam generator tubes, which cool the core, were found to be defective. These devices had failed after 25 years of operation; their expected lifetime was 40 years. San Onofre had to be shut down to replace the steam generators, and the replacements failed in January 2012, after 16 months; one tube leaked radioactivity into the environment. It is my understanding that because the original steam generators were supposed to last the entire lifetime of the plant, the containment dome had to be broken open in order to replace the steam generators.

Here is the situation: Unit 1 at San Onofre was permanently shut down in 1992. Units 2 and 3 had faulty replacement steam generator tubes that failed after a year and a half. SCE wants permission to run the plant at 70% power for a two-year period ("Cycle 17"). Engineers do not know the cause of the failure. SCE has no credibility in its claim that operating this plant incurs no significant increased risk.

Around the world, after Fukushima in 2011, national governments are phasing out nuclear power. San Onofre is in a region subject to earthquakes and tsunamis, just like Fukushima, and there are 8 million people in a 50-mile radius of the plant. Operation of this crippled plant is a callous effort to extract a few hundred million dollars, risking the lives and health of 8 million people and untold property losses. In my view this is not just insane; it is criminal.

**SUNSI Review Complete**  
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