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

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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Comment on FR Doc # 2013-08888

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Organization: Council Member

Government Agency Type: Local

Government Agency: City of Redondo Beach

General Comment

See attached file....

Attachments

BrandRBCouncil

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= B. Benney (bjb)

Brian Benney, Senior Project Manager
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Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket ID NRC-2013-0070

May 15, 2013

Dear Mr. Benney:

As a City Councilmember of Redondo Beach, I write to express my deep concerns regarding the proposed restart of the severely damaged Unit 2 of the San Onofre Nuclear Generating Station. Given the potential for a major nuclear accident here, which risks causing serious harm to millions of people in Southern California, including my constituents, every precaution must be taken prior to restarting either Unit 2 or Unit 3. A major accident at SONGS could have far reaching consequences. It is, therefore, all the more imperative to me that any decisions regarding the proposed restart of either SONGS reactor be made with maximum deliberation and meaningful opportunity for input from the public.

Southern California Edison, operator of the SONGS reactors, has proposed to experiment with a restart of the Unit 2 reactor at reduced power for five months. However, significant uncertainties remain. The analyses submitted by Edison's own consultants to support this restart plan not only conflict with one another regarding the cause of the wear, but do not provide assurance that another accident may not occur within months of restart.

To restart a severely damaged nuclear reactor when the cause of the damage is uncertain, the time until another accident unclear, and the basis for the restart is reliant upon an assumption that this critical equipment will progressively destroy itself – even during reduced power operation – puts the lives and livelihoods of my constituents at unacceptable risk.

I am further troubled that Edison chose to submit to the Nuclear Regulatory Commission a request for a license amendment that would relax the rules regarding the integrity of the degraded steam generator tubes –the very issue that led to the unexpected shut down of the reactors.

This license amendment request unfortunately ignores the multiple safety issues that should be addressed in a comprehensive license amendment process prior to any approval for restart of San Onofre reactor unit 2. These include:

- ▲ steam generator tube integrity; the fact that future degradation and damage is predicted even by Edison's own experts, and the possible consequences for reactor safety;
- ▲ the potential consequences of operating damaged unrepaired steam generators for other vital key safety functions of the San Onofre reactor, including reactor emergency core cooling systems;
- ▲ the increased risk of accident, including release of significant radiation into the environment of Southern California, and the consequences for human health, including radiation dose rates, and the ability of emergency services to manage such a crisis;
- ▲ the earthquake risk to the degraded steam generators, including their ability to retain integrity in the event of a seismic event, and the consequences of an accident and release of radioactivity to the environment.

Edison has further asked the NRC to determine that this amendment involves "no significant hazards consideration." Before the NRC allows any proposed changes to San Onofre's operating license, the public deserves the safety questions to be fully addressed in a transparent hearing that allows testimony by local communities and third party experts.

The Atomic Energy Act, which governs the NRC and these issues, guarantees the public the right to a full adjudicatory hearing during licensing proceedings. The no significant hazard determination is to only be used for routine license amendments. It would be wholly inappropriate for the NRC to make such a determination in this case --which then circumvents the required thorough process --given the issues outlined above and the unique and severe damage in San Onofre's nearly brand new replacement steam generators.

I understand the NRC staff has already issued a preliminary finding of no significant hazards consideration, with a final determination to be made some time in the next 5-6 weeks. I am deeply concerned about this proposed determination, because it would, based on incomplete, contradictory safety analyses by Edison, allow the restart of the Unit 2 reactor before any hearing was held. Thus the hearing would be rendered essentially meaningless. That the NRC is currently considering issuing a final determination of "no significant hazard consideration" is to disregard the safety concerns of millions of people in Southern California, including the citizens I represent.

I am concerned that several nuclear experts have raised serious questions about the safety of Edison's proposed license amendment. These questions should be fully and formally examined and subjected to robust adjudicatory hearings. In addition, all on-going investigations that are directly related to the replacement of the San Onofre steam generators and in particular their design, and root cause of the severe wear must be completed. I agree with the views expressed on these issues by Senator Barbara Boxer. There is no compelling reason to take major safety risks to help return an aging, heavily damaged nuclear reactor located in a seismic zone to 70% capacity. Our lights in

Southern California have stayed on for over a year without San Onofre, and the state has plans in place to ensure this continues.

Edison's license amendment request and the NRC's proposal would deprive the public an opportunity for a hearing before the NRC decides whether to issue the license amendment by issuing a "no significant hazards consideration" determination. The NRC should eschew these actions.

I additionally wish to associate myself and express my full support for and agreement with the submission of Friends of the Earth to this license amendment request, including their opposition to the NRC's determination of a no significant hazard consideration.

Regards,

Bill Brand
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CC: Senator Barbara Boxer
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