

RULES AND DIRECTIVES  
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USNRC

As of: May 17, 2013  
Received: May 16, 2013  
Status: Pending\_Post  
Tracking No. ljsx-85cs-rjhw  
Comments Due: May 16, 2013  
Submission Type: Web

# PUBLIC SUBMISSION

2013 MAY 17 AM 9: 35

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**Docket:** NRC-2013-0070

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

**Document:** NRC-2013-0070-DRAFT-0188

Comment on FR Doc # 2013-08888

4/16/2013  
78 FR 22576  
(282)

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## Submitter Information

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## General Comment

While I am a City Councilmember in the City of Malibu, I am submitting the attached file as an individual, not a representative of the City.

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## Attachments

NRC SEC letter

**SUNSI Review Complete**  
Template = ADM - 013  
E-RIDS= ADM-03  
Add= B. Benney (bjb)

JOHN W SIBERT · 6665 Zumirez Drive Malibu, CA 90265

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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 15, 2013

Dear Chairman Macfarlane:

I am a City Councilmember in Malibu, California and the former Mayor. I am not speaking for the City or the Council, but strictly for myself. I am also a scientist, having been a professor and administrator at Yale, Caltech and the CSU system. In addition, I managed the corporate research laboratories for a major US oil company. Let me state that I am not opposed to nuclear power, as long as we take great care in building, operating and regulating the facilities. While the risk for any major power generating facility is significant and they need to be safely sited and operated, nuclear power plants require even greater precautions.

I write to express my deep concerns regarding the proposed restart of one of the severely impaired San Onofre nuclear reactors. Given the potential damage of a nuclear accident at San Onofre, which risks causing serious harm to millions of people in Southern California, including my constituents, every precaution must be taken prior to restarting either of these identical damaged reactors. The district I represent is home to 26 miles of coastline that are a local and international treasure. A major accident at San Onofre has the potential to severely damage this precious, irreplaceable resource. It is, therefore, all the more imperative to me that any decisions regarding the proposed restart of either San Onofre reactor be made with maximum deliberation and meaningful opportunity for input from the public and qualified experts.

Southern California Edison, operator of the San Onofre reactors, has proposed to restart Unit 2 reactor for five months at reduced power. However, from what I have been able to ascertain, significant uncertainties remain. To restart a damaged nuclear reactor when the cause of the damage is uncertain, 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 narrow 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 narrow license amendment request unfortunately ignores a number of safety issues that should be addressed in a comprehensive license amendment process prior to any approval for restart of San Onofre reactor unit 2. Tube integrity is a critical element for any steam generator, but it is even more important for a nuclear facility, given the scale of the potential harm that could result from failure. While I am not an expert in power generation, I believe I do understand risk management. Edison has asked the NRC to determine that this amendment carry “no significant hazard.” I do not believe that that finding can be made without fully addressing the causes of the previous failure and the mitigation procedures that must be taken. 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 should be completed before even a limited re-start.

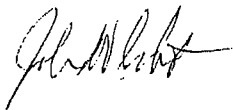
JOHN W SIBERT 6665 Zumirez Drive Malibu, CA 90265

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I agree with the views expressed on these issues by Senator Barbara Boxer. There is no convincing reason to take safety risks to help return an aging, damaged nuclear reactor to 70% capacity. While I understand that we do need secure, reliable power in California, I do not believe that there is a compelling need to rush this reactor back into operation without addressing the serious issues that have been raised.

Neither Edison's license amendment request nor its request for a no significant hazard determination provides the prudence or protection of the public's right to a fair, rigorous hearing that this issue warrants. I urge you to reject these requests.

Best Regards,



John Sibert, City Councilmember  
City Of Malibu

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