#### RULES AND DIRECTIVES BRANCH USNRC

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**Docket:** NRC-2013-0070

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78 FR 225 76

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-0214 Comment on FR Doc # 2013-08888

### Submitter Information

Name: David Zito Address: 635 S Hwy 101 Solana Beach, CA, 92075 Government Agency Type: Local

#### **General Comment**

I write to express my deep concerns regarding the proposed restart of one of the severely damaged San Onofre nuclear reactors. Due to the proximity of this facility to major urban areas and the potential of an accident to cause serious harm to millions of Southern California residents, including my constituents, every precaution must be taken prior to restarting either damaged reactor. The process being proposed by Southern California Edison to move toward a restart does not provide for the necessary public input and debate nor does the existing analysis appear to be comprehensive enough to ensure safe operation and thus will put the lives and livelihoods of my constituents at unacceptable risk.

I support nuclear power as part of our overall energy portfolio in the United States and California, at least until we can replace much of the existing dirty fossil fuel based utilities with cleaner alternatives. However, with the use of nuclear technology the public puts much trust and faith in our utilities and regulatory agencies to ensure a truly safe and reliable operating environment which does not put undue risk on our cities and natural resources. For nuclear power to have a solid future the public must not only be safe, but they must also believe that they are safe and that the oversight and controls in place will ensure continued safe operation for years to come. With the recent nuclear accidents and historical appearance of the industry to attempt to cover up the true extent of troubles in numerous nuclear events, it's imperative that public trust be re-established in the process of possibly bringing San Onofre back online. We are nowhere near that yet. Please ensure that this potential restart goes through the full public review process without any shortcuts being taken.

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

https://www.fdms.gov/fdms-web-agency/component/contentstreamer?objectIc

### Attachments

#### $DavidZitoLetter\_SanOnofre$

https://www.fdms.gov/fdms-web-agency/component/contentstreamer?objectId=09000064812e84e7&for... 05/17/2013

Brian Benney, Senior Project Manager SONGS Project Branch Division of Operator Reactor Licensing Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 RE: Docket ID NRC-2013-0070

May 16, 2013

Dear Mr. Benney:

As a City Councilmember of Solana Beach, I write to express my deep concerns regarding the proposed restart of one of the severely damaged San Onofre nuclear reactors. Due to the proximity of this facility to major urban areas and the potential of an accident to cause serious harm to millions of Southern California residents, including my constituents, every precaution must be taken prior to restarting either damaged reactor. The process being proposed by Southern California Edison to move toward a restart does not provide for the necessary public input and debate nor does the existing analysis appear to be comprehensive enough to ensure safe operation and thus will put the lives and livelihoods of my constituents at unacceptable risk.

I support nuclear power as part of our overall energy portfolio in the United States and California, at least until we can replace much of the existing dirty fossil fuel based utilities with cleaner alternatives. However, with the use of nuclear technology the public puts much trust and faith in our utilities and regulatory agencies to ensure a truly safe and reliable operating environment which does not put undue risk on our cities and natural resources. For nuclear power to have a solid future the public must not only be safe, but they must also believe that they are safe and that the oversight and controls in place will ensure continued safe operation for years to come. With the recent nuclear accidents and historical appearance of the industry to attempt to cover up the true extent of troubles in numerous nuclear events, it's imperative that public trust be re-established in the process of possibly bringing San Onofre back online. We are nowhere near that yet. Some relevant points that need to be addressed and resolved through a public process:

- The analyses submitted by Edison's own consultants to purportedly support their 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.
- Edison's own experts have predicted future degradation and damage of the steam generator tube integrity
- Proper analysis of the enhanced risk due to the damaged tubes in the event of an earthquake or tsunami at the site.

Edison has chosen 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 is not appropriate and further creates public distrust of the entire industry as well as placing millions of people in unacceptable risk. 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. Please ensure that this is the case.

Regards.

David Zito, Solana Beach CA