From: Dricks, Victor
To: myla.reson@gmail.com
Subject: Response to Questions
Date: Monday, May 20, 2013 4:10:01 PM

Dear Ms. Reson:

Art Howell asked me to respond to your February 14, 2013 e-mail on his behalf. You asked several questions concerning San Onofre, all focused on how the NRC determines that a plant is safe. Specifically, you asked three questions to which I am providing a response.

1. *What is your definition of "safe?"*

The NRC is a federal regulatory agency, charged with ensuring the safe use of nuclear materials and, in particular to your question, the safe use of nuclear materials in the construction, startup, operation, shutdown, and permanent decommissioning of commercial nuclear power plants, like San Onofre.

One of the strategic goals of the NRC[1] is: Safety: Ensure adequate protection of public health and safety and the environment. Our Strategic Outcomes are to:

- Prevent the occurrence of nuclear reactor accidents.
- Prevent the occurrence of inadvertent criticality events.
- Prevent the occurrence of acute radiation exposures resulting in fatalities.
- Prevent the occurrence of releases of radioactive materials that result in significant radiation exposures.
- Prevent the occurrence of releases of radioactive materials that cause significant adverse environmental impacts.

The NRC achieves its safety goal by licensing individuals and organizations to use radioactive materials for beneficial civilian purposes and then ensuring licensees perform at acceptable safety levels. In particular, the agency maintains vigilance over safety performance through licensing reviews,
inspections, assessment, enforcement, investigations, expanded oversight (when needed), rulemaking, and incident response. In addition, the NRC continually seeks to promptly identify and resolve any potential safety issues, including those with generic implications for multiple reactors or licensees.
The agency conducts its activities using sound science, risk insights, the principle of defense-in-depth, and operating experience to ensure that licensed facilities have adequate safety margins.[2]

2. *When you make your determination about whether or not the San Onofre nuclear power plant can be operated safely, will the impacts of beyond design basis events like super quakes and tsunamis be factored in?*

   Following the terrorist attack events of September 11, 2001, the law [specifically 10 CFR 50.54.hh(2)] was changed to require licensees to consider specific beyond design

basis events, including large scale fires and plant damage, and to ensure equipment remained available to safely shut down the plant and maintain the reactor fuel, both in the reactor as well as in the spent fuel pool and/or dry storage, cooled and secure. Following the Fukushima reactor accident in March 2011, additional requirements have been imposed and changes to the law are being proposed, along with multiple additional inspections associated with flooding, seismic design, and loss of offsite power. Those actions are continuing and will be a factor in our ongoing evaluation of safety at all of our nation's commercial nuclear power plants.

3. *Has there been or will there be a seismic evaluation of the damaged replacement steam generators prior to making a determination about the safety of Edison's restart plan?*

   In my emails to you on March 28 and April 4, 2013, I informed you that Southern California Edison (SCE) did complete a seismic evaluation as part of their Return to Service Report. Section 5.2.1 describes that the design basis seismic event was analyzed and was determined not to be limiting. The SCE Return to Service Report can be found on the SONGS Public Website at http://pbadupws.nrc.gov/docs/ML1228/ML122850320.html. Refer to the first document listed: "ML12285A263 - San Onofre Nuclear Generating Station, Unit 2 - Confirmatory Action Letter - Actions to Address Steam Generator Tube Degradation. (134 page(s), 10/3/2012)." NRC is continuing our assessment and inspection of the licensee's evaluation, the results of which will be publicly available when our inspection and technical evaluation reports are issued and discussed during our next public meeting near SONGS.

Victor Dricks
Public Affairs Officer
U.S. Nuclear Regulatory Commission / Region IV
1600 E. Lamar Blvd.
Arlington, Texas 76011
(817) 200-1128 (Office)
(817) 983-1992 (Cell)

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[1] See NRC Strategic Plan Fiscal Years 2008-2013, NUREG 1614, Volume 5, February 2012. http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/

[2] Id.