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**Joosten, Sandy**

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**From:** George Watland [george.watland@sierraclub.org]  
**Sent:** Wednesday, May 15, 2013 8:14 PM  
**To:** Bladey, Cindy  
**Cc:** CHAIRMAN Resource; CMRAPOSTOLAKIS Resource; CMRSVINICKI Resource; CMROSTENDORFF Resource; CMRMAGWOOD Resource; US Senator Barbara Boxer; Glenn Pascall  
**Subject:** Docket ID NRC20130070, Comments to the NRC: Do Not Restart San Onofre Unit 2

May 15, 2013

4/16/2013  
78 FR 22576  
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Cindy Bladey, Chief  
Rules, Announcements and Directives Branch  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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RULES AND DIRECTIVES  
BRANCH  
USNRC

Re: Docket ID NRC20130070

Dear Ms. Bladey:

Through its San Onofre Task Force, the Sierra Club is on record in extensive communications to the Nuclear Regulatory Commission urging that any restart of the plant should require a license amendment process before a judge, including public hearings, sworn testimony from expert witnesses, and rules of evidence. Some 3,500 citizens in the San Onofre region have written their own letters to the Commission on this point as a result of the Sierra Club's position on the issue.

We have been concerned about the degree of risk at a plant that has had a disturbing record of operational safety violations and unprecedented technology failures. We have also been concerned that fast-track approval of restart would imperil if not undermine the stated intent of Chair Lisa Macfarlane and other NRC officers to assure the public a high and consistent level of transparency in decision-making.

Both these concerns have been significantly increased as a result of a decision this Monday, May 13, by the U.S. Atomic Safety Licensing Board granting a petition by Friends of the Earth and ruling that the plant cannot restart operations before the NRC holds a formal license amendment proceeding with full public participation. While the NRC has legal authority to spurn an ASLB ruling, the consequences of doing so in this case would be devastating both to public concerns regarding safety and to the NRC's process credibility.

The Sierra Club, through its San Onofre Task Force, wishes to associate itself with, and to express full support and agreement with, the submission by Friends of the Earth of its petition opposing both Southern California Edison's request for restart without a public hearing process and the initial determination by NRC staff of no significant hazard in restart. The granting of this petition by the ASLB adds enormously to its weight and we urge you to respond with due consideration in order to forestall the potential for highly negative environmental and public policy consequences.

Thank you for consideration of our views.

Glenn Pascall

Chair, San Onofre Task Force

Sierra Club Angeles Chapter

3435 Wilshire Blvd. Suite 660

Los Angeles, CA 90010

Cc: NRC Commissioners

U.S. Senator Barbara Boxer

U.S. Representative Ed Markey