

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Tuesday, November 19, 2013 4:08 PM
To: Rulemaking1CEm Resource
Subject: FW: Pool storage at San Onofre

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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

COMMENT#: 00203

From: Bob Deshotels [<mailto:r.l.deshotels@cox.net>]
Sent: Friday, November 15, 2013 5:45 PM
To: RulemakingComments Resource
Subject: Pool storage at San Onofre

I would like assurance that the pool storage for spent fuel from San Onofre, especially the high burn-up fuel, is safe under credible tsunami conditions.

If a tsunami were to damage the pool storage in a way that would cause loss of pool water while shoving the waste containers into a corner of the pool (causing unsafe geometry for cooling) the results could be catastrophic, even if the emergency generators can perform their function of providing emergency cooling.

Typically, nuclear systems that could have a catastrophic failure are designed to withstand natural phenomena that could occur with an expected frequency of 1/1000 per year. In the case of tornadoes, because of the uncertainty in historical data, the design is 1/10,000. Because of poor documentation of past tsunamis, and the demonstrated inability of the scientific community to predict tsunami magnitudes (e.g., Fukushima), I think the pool cooling at San Onofre should be designed for the worst tsunami expected in 10,000 years. I do not see where this has been accomplished.

Historian Doris Walker, in the book "Dana Point Harbor/ Capistrano Bay" published by To-The-Point Press in Dana Point, reports on page 54 that an earthquake on December 12, 1812 caused the largest tidal wave ever reported on the Pacific coast -- the water rising 35 to 50 feet above sea level, washing away many shoreline encampments. This report by the Spanish friars from about 200 years ago (much less than 10,000) tells me that the spent fuel pool should be designed for at least a 50-foot tsunami. Of course the response will be that the friars were of doubtful reliability. On the other hand, modern attempts to predict tsunamis have been proven unreliable, not just doubtful. Remember that when the famous ship Titanic sank, all of the engineers testified at the official inquest that the ship went down in one piece, while other survivors reported that ship broke in half. The remains of the ship later demonstrated that the ship had broken on the surface. This should demonstrate to all of us that engineers and scientists resist accepting anything that they believe is not possible, even when that belief is based on incomplete knowledge. Let us not fall into that trap again.

Respectfully,

Bob Deshotels,
Retired quantitative risk analyst (Director of Health, Safety and Environment) Fluor Corporation

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