

**From:** Patricia Borchmann <patriciaborchmann@gmail.com>  
**Sent:** Thursday, May 22, 2014 4:34 PM  
**To:** Conley, Maureen; McIntyre, David; Dricks, Victor  
**Subject:** Re: Urgent Request to Extend Public Comments for San Diego County NRC Docket 2013-0271

[maureen.conley@nrc.gov](mailto:maureen.conley@nrc.gov)  
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I'm RESENDING my email from an hour ago. Sorry the first attempt I didn't have the period separating first/last names.

Patricia Borchmann

On Thu, May 22, 2014 at 11:40 AM, Patricia Borchmann <[patriciaborchmann@gmail.com](mailto:patriciaborchmann@gmail.com)> wrote:  
Maureen Conley - NRC Office of Public Assistance,

Thank you for your followup phone call this morning (8:20 am), responding to the voice mail I left earlier this morning (6:45 am) with NRC OPA David McIntyre.

I'm sorry I was occupied (as a driver transporting dev. disabled adult to United Cerebral Palsy in Escondido) when you called. Even tho I pulled over to speak safely on the phone, our conversation was rushed, and not ideal. You confirmed you are still tracking my email message left on Monday (05 19 14) on NRC's public website link with Office of Public Affairs (OPA).

Besides the reasons already stated in my email on Monday to OPA, (declared emergency in SD County, and State) for multiple wildfires in SD County when NRC's comment deadline on Docket No. 2013-0271, I think there is an even MORE RELEVANT AND COMPELLING reason San Diego reactor community citizens deserve an extended public comment period !

Because tonight there is a second Community Engagement Panel (CEP) Public Info Meeting in Laguna Hills (6-9 pm), pertaining to SCE Edison's proposed Decommissioning Plans for San Onofre Nuclear Generating Station (SONGS Units 2 & 3).

Edison's choice of community members chosen as CEP Panel members excludes most citizen representatives from local community groups representing views of independent experts from outside the nuclear utility, and nuclear industry. So CEP's first meeting largely reflected SCE Edison's perspective(s) on their proposed Decommissioning Plan.

The vital 'missing piece' which needs to be more fully integrated into NRC's 'public processes' on Rulemaking for NUHOMS 32 PTH2 Design Amendment leaves out THE FACT that the same utility entity (SCE Edison) was just recently notified by NRC of a serious violation, through actions taken by SCE last September 2013, to essentially just terminate a total of 39 CRITICAL

onsite safety positions at San Onofre (SONGS) Units 2 & 3, which form the FUNDAMENTAL, most basic onsite emergency safety functions, upon which the Emergency Response Plans for both San Diego County, Orange County, (and possibly LA, and Riverside counties are ALL BASED !!

A conservative estimate is that a population of 8.4 million located within 50 miles of San Onofre are exposed to very realistic (not imagined, or speculative) threats posed by two (2) 'unprotected', or not fully protected nuclear reactors which may have been permanently retired premature in 2013, yet the SONGS reactor site will still be an indefinitely prolonged storage site for spent HLRW stored in overly dense spent fuel pools, and dry cask storage containers since approximately 2002- 2003 which were never designed for high burn up fuel, or cask containers which have no capability or instrumentation for 'real-time monitoring' on the condition of materials inside the casks, or to determine if they are even capable of being transported offsite (if there were a repository to go to), or transferred to more modern, more durable casks. This is an extremely dangerous condition, which SCE Edison has so far, successfully seemed to suppress from media coverage, or exposure.

So - THAT'S THE NEW, MORE RELEVANT AND COMPELLING REASONS THAT I ASSERT THE SAN DIEGO REACTOR COMMUNITY CITIZENS DESERVE AN EXTENDED PUBLIC COMMENT PERIOD ON NRC'S RULEMAKING FOR THE NUHOMS 32 PTH2 DRY CASK STORAGE CONTAINER DESIGN.

I am sorry that apparently I utilized an 'improper method' of notifying NRC that public comments from citizens in San Diego by the specified deadline of Thursday 05 15 14 WAS IMPOSSIBLE, due to the ongoing, growing multiple wildfires in SD County, where Emergency conditions were declared Countywide, and Statewide,!

Personally, I had evacuated voluntarily to my sister's home in Carlsbad on the evening of Wednesday 05-14-14, until I returned to my home in west Escondido on Friday evening 05 16 14. During the rushed effort to evacuate my home, I inadvertently left the relevant folder I had prepared with materials pertaining to NRC's Docket No. NRC ID 2013-0271, so I did not have the Federal Register notice with me, or the 'proper' contact information and specific instructions for responding with public comments by the 05 15 14 deadline.

This issue will be highly relevant to tonight's Community Engagement Panel (CEP) Public Info Meeting tonight (Thursday 05 22 14, 6-9pm) at the Hills Hotel in Laguna Hills, on SCE Edison's proposed Decommissioning Plans for San Onofre (SONGS) Units 2 & 3.

Please keep me updated regarding NRC's position, to respond to my request for extension of time for accepting public comments from San Diego County. I am NOT the only concerned citizen, believe me. So, timing is crucial. !! You suggested I submit my comments immediately for consideration. I will finalize my written comments in letter format this weekend if possible for submittal to NRC, as we discussed during our phone call. During the interim, I felt that it was important to update you more fully by email, (to supplement our brief (10 minute) phone conversation this morning at 8:20 am.)

Please respond by email if possible. [patriciaborchmann@gmail.com](mailto:patriciaborchmann@gmail.com)

Thank you for thoughtful consideration.

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