

## CHAIRMAN Resource

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**From:** Chris.Thompson@edisonintl.com  
**Sent:** Wednesday, October 15, 2014 12:34 AM  
**To:** marnimagda@gmail.com  
**Cc:** Wengert, Thomas; CHAIRMAN Resource; david.victor@ucsd.edu; garry@coastkeeper.org; dstetson@ocean-institute.org; pat.bates@ocgov.com; Tom.Palmisano@sce.com  
**Subject:** Fw: Irradiated Fuel Management Plan  
**Attachments:** Irradiated Fuel Management PlanConcerns oct10 2014.docx

Ms. Magda-

We are committed to performing the work of decommissioning SONGS in a transparent way and welcome the opportunity to explain the process to the public. Southern California Edison took the initiative to establish the Community Engagement Panel to serve as a two-way conduit for information about decommissioning from Edison to the community and feedback from the community to Edison. As part of that two-way communication, we have sought feedback from the Panel and public on the major decommissioning regulatory filings with the NRC, including the Irradiated Fuel Management Plan.

The draft IFMP was provided to the CEP on May 15th and was posted on [SONGScommunity.com](http://SONGScommunity.com).

Below is a timeline of CEP actions related to the IFMP and spent fuel issues. Not included in the timeline below is today's special meeting of the CEP at which Areva TN and Holtec presented information on their dry storage systems.

Date	Action
05-03-14	<b>Background on Spent Fuel Management</b> sent via e-mail to CEP members as pre-read material for CEP Workshop on 05-06-14
05-06-14	<b>CEP Workshop</b> held with a focus on Spent Fuel Management to build a depth of knowledge in advance of the CEP Regular Meeting on 05-22-14 which was to focus on the IFMP
05-15-14	<b>San Onofre draft IFMP</b> sent via e-mail to CEP members as pre-read material; Draft IFMP posted to <a href="http://www.SONGScommunity.com">www.SONGScommunity.com</a>
05-22-14	<b>CEP Regular Meeting</b> with an in-depth review of the San Onofre IFMP and a request for feedback on the draft submittal
07-10-14	<b>SCE response to questions</b> regarding the IFMP and related matters that were posed by CEP members on 05-22-14 that were not addressed during the 05-22-14 meeting; Q&A posted to <a href="http://www.songscommunity.com/docs/Responses_IFMP_Feedback_May22MeetingComments.pdf">http://www.songscommunity.com/docs/Responses_IFMP_Feedback_May22MeetingComments.pdf</a>
09-23-14	<b>Latest draft of San Onofre IFMP</b> submitted to NRC, sent via e-mail to the CEP, and posted to website at <a href="http://www.songscommunity.com/docs/051514_IFMP.pdf">http://www.songscommunity.com/docs/051514_IFMP.pdf</a>

I hope you find this information useful.

Best,

Chris

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Chris Thompson  
Vice President, Decommissioning  
Southern California Edison  
(626) 302-1363

----- Forwarded by Chris Thompson/SCE/EIX on 10/14/2014 09:04 PM -----

From: Tom Palmisano <Tom.Palmisano@sce.com>  
To: Chris Thompson <Chris.Thompson@edisonintl.com>,  
Date: 10/14/2014 08:01 AM  
Subject: FW: Irradiated Fuel Management Plan

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Tom Palmisano  
Vice President and Chief Nuclear Officer  
San Onofre Nuclear Generating Station  
Southern California Edison  
Office: 949-368-6575  
Tom.Palmisano@sce.com

From: Marni Magda [<mailto:marnimagda@gmail.com>]  
Sent: Sunday, October 12, 2014 10:42 PM  
To: thomas.Wengert@nrc.gov  
Cc: chairman@nrc.gov; Tom Palmisano; David Victor; Garry Brown; Dan Stetson;  
Pat.Bates@ocgov.com  
Subject: Irradiated Fuel Management Plan

October 12, 2014

Thomas Wengert  
Office of Nuclear Reactor Regulations  
[Thomas.Wengert@nrc.gov](mailto:Thomas.Wengert@nrc.gov) <<mailto:Thomas.Wengert@nrc.gov>>

Re: Irradiated Fuel Management Plan

SCE released its Irradiated Fuel Management Plan (IFMP) to the public on Oct. 2, 2014 online. It has never been discussed at a public meeting but is a "Final Draft" document sent to the NRC for their approval on September 23, 2014 without the knowledge of the Community Engagement Panel established by SCE. Where is public transparency? The NRC just announced its public meeting about SCE's final plans for decommissioning SONGS to be held on October 27, 2014. Over 400 pages of documents have already been decided, the IFMP included. Where is meaningful public input?

The IFMP document is unacceptable. California never agreed to become a nuclear waste dump. Leaving 1632 tons of spent nuclear fuel on site is unacceptable with the realities of 2014 compared to 1980 which include a newly discovered earthquake fault nearby, a tsunami zone defined as possible risk, no plans for the advanced abilities of terrorists, and canisters for dry storage that cannot last as long as the nuclear fuel within them is deadly.

But particularly distressing as to new knowledge of NRC and SCE plans is found in the Irradiated Fuel Management Plan (IFMP) document about DOE Contracts for accepting spent nuclear fuel from Industry reactors. The SONGS timeline of DOE acceptance of SONGS spent fuel is established. The Department of Energy says it will be ready by 2024 to begin taking spent fuel from the industry reactors. San Onofre gets none removed until 2049 because of its place on a queue.

What is the DOE Standard Contract for acceptance and disposal of spent nuclear fuel that SCE for SONGS is using? The IFMP is confusing on page three. It says the initial ranking of industry-wide spent fuel acceptance obligations is based upon the date of permanent removal of the spent nuclear fuel from service ("oldest fuel first")

allocation). What is SONGS place in the queue? How was that place determined? Please list the location and amount nuclear spent fuel in either spent fuel pools or dry storage casks that is older than SONGS and list their dates of removal from service.

Since priority for retired units over-rides "oldest fuel", why is Songs not one of the first DOE contracted for DOE acceptance and removal? The DOE begins taking the industry's nuclear fuel in 2024 and Songs doesn't get any removed until 2049? How is that possible? Twenty-five years? By then 50 of SONGS dry storage casks placed in dry storage in 2004 will be 45 years old and will have needed two re-certifications. Will those casks be too brittle to be moved in 45 years? NRC studies show that remaining on the ocean is likely to make them too dangerous to move.

Has SCE sold Southern California out? "Those Standard Contracts (DOE) also contain provisions allowing for "exchanges" of acceptance obligations." Has SCE sold the SONGS spent fuel position in the queue? Have they exchanged something to take a later removal date? What? When? Authorized by whom? They are endangering 8.4 million people and the ocean of Southern California.

On October 14, 2014 at the SCE CEP meeting, the public expects and deserves written and publicly announced answers to these questions that will be shared with California elected officials.

Respectively submitted by

Marni Magda

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949 230-9181

October 12,2014

Thomas Wengert

Office of Nuclear Reactor Regulations

Thomas.Wengert@nrc.gov

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