

10/14/2014  
79FR 61668

# PUBLIC SUBMISSION

①

<b>As of:</b> November 17, 2014
<b>Received:</b> November 14, 2014
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1jy-8fhy-5npd
<b>Comments Due:</b> December 22, 2014
<b>Submission Type:</b> Web

**Docket:** NRC-2014-0223

Southern California Edison Company; San Onofre Nuclear Generating Station, Units 2 and 3

**Comment On:** NRC-2014-0223-0001

Southern California Edison Company; San Onofre Nuclear Generating Station, Units 2 and 3; Post-Shutdown Decommissioning Activities Report

**Document:** NRC-2014-0223-DRAFT-0003

Comment on FR Doc # 2014-24356

## Submitter Information

**Name:** Marni Magda

**Address:**

460 Oak Street

Laguna Beach, CA, 92651

**Email:** marnimagda@gmail.com

RECEIVED

2014 NOV 17 PM 2:24

RULES AND DIRECTIVES  
BRANCH  
UNIT 10

## General Comment

I ask for an NRC vote of non-support of SONGS PSDAR and DCE as the plan is INADEQUATE to protect under the NRC Waste Rule both the lives and the property of the people living in a 50 mile radius of the decommissioning plant until ALL of the Spent Nuclear Fuel is removed from San Onofre. The Federal Government promised to remove it and must do so by creating an Interim California Solution away from the hazards of our California coast and 8.4 million people. Please enter my 4 page letter with the reasons for this request to be considered by the NRC and to be a part of the public record.

Thank you.

Marni Magda

## Attachments

NRC Oct 27 hearing response to deny SCE PSDAR 11 12 14

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= *J. Weugert (J5W2)*

*J. Burkhardt (JCB2)*

Docket Nos. 50-361 and 50 362

November 12, 2014

To: [Larry.camper@nrc.gov](mailto:Larry.camper@nrc.gov); [Thomas.Wengert@nrc.gov](mailto:Thomas.Wengert@nrc.gov) ; [chairman@nrc.gov](mailto:chairman@nrc.gov)

Response to the October 27, 2014 NRC Hearing to discuss SCE's Decommissioning of SONGS Plans

Concerning NRC approval of SCE 's PSDAR DCE, EIE, IFMP for SONGS and the need for the NRC to revise NuREG 1927 and NuREG 2157.

According to your NRC rules and regulations this letter is to ask that you enforce your rules and deny approval of SCE's PSDAR and their DCE. It is further, a demand that you follow the law and deny the petition of SCE filed on February 13, 2014 seeking NRC approval to use the Nuclear Decommissioning Trust Funds for all three categories of activities detailed in Section II of the PSDAR. One would hope that request could not be approved before an approval of the PSDAR but if it has been given, the NRC must rescinded allowing the Ratepayers' Trust Fund from any purpose other than its priority which is protecting the spent fuel until the DOE removes it from San Onofre.

The Ratepayer's Trust Fund is to be used as a first priority for public safety against accidents with spent nuclear fuel. SCE's PSDAR and DCE currently spend on Site Restoration and License Termination three-fourths of the \$4 billion dollars. That is against your regulations. By 2030 they will have used most of the Ratepayers Trust Fund and will have abandoned the deadly fuel without a back up on the cement pad on the bluff with 150 aging canisters and no system to protect or transport them. By 2050 there is no money and no plan if the government has not come for the fuel. Your rules and regulations, as bad as they are, do demand a back-up plan for Long Term storage for 240 years. The current PSDAR and DCE do not follow NRC rules for a proper Dry Transfer System (DTS) or an ISFSI with back up replacement costs as dangers of the current plan for the fuel become obvious.

Rule statement from NRC Generic Environmental Impact Statement (GEIS) NuReg 2157, page 56245

***The NRC analyzed three timeframes in the GEIS that represent various scenarios for the length of continued storage that may be needed before spent fuel is sent to a repository. The first timeframe is the short-term timeframe, which analyzes 60 years of continued storage after the end of a reactor's licensed life for operation....***

***Long-term storage is continued storage of spent fuel for an additional 100 years after the short-term timeframe for a total of 160 years beyond the licensed life for operation of a reactor. The GEIS assumes that all spent fuel has been transferred from the spent fuel pool to an ISFSI by the end of the short-term period. The GEIS also assumes that a repository would become available by the end of the long-term timeframe. By the end of the long-term timeframe, some spent fuel could be between 200 and 240 years old. Long-term storage activities include the following:***

***Continued storage of spent fuel in ISFSIs, including routine maintenance.***

***One time replacement of ISFSIs and spent fuel canisters and casks; and***

***Construction, operation, and one replacement of a dry transfer system (DTS)***

The NRC has created a deadly document for the safe future of the United States. Nureg 2157 The NRC Generic Environmental Impact Statement (GEIS) must be revised. I attended the NRC meeting in California after Fukushima and sent comments that it could not be based upon correct science and a look at our times in 2014. It had to be a throwback from the 1980's. With the lawsuits now pending attacking the GEIS for its Generic Waste Rule, I would like to add that the document does not hold to the truth of today's environmental and security dangers for protecting life and it must be a document of NRC rules and regulations that protect U.S. citizens from denial of property.

I would like to direct our three new Commissioners on the NRC to an email I sent on Sept 24, 2014 after listening in on the NRC/ SCE meeting about moving the current Main Control Room at SONGS. TAC NOS MF4779. I can resend the letter. It shows that SCE is moving forward with the expectation that Ratepayer's Funds will be available for purposes other than nuclear spent fuel protection. But more than that it revealed the non transparency and non-scientific approach to issues of 2014 as SCE and the NRC create a waste dump at San Onofre. What I heard was about twenty people looking back in time for a precedent at some other site to allow SCE to reduce security and rebuild a control room three times without any true information given to the public on the plan. SCE's EIE was the same way. It could not hold to today's issues of environmental or security safety from denial of property and safety of lives. And NuREG 1927 lets canisters on the ocean remain uninspected for 80 years with no details that are clear of cost and responsibility and authority.

Since the August 25, 2014 SCE CEP meeting where the public had a chance to comment on the PSDAR, SCE has continued to ignore public concerns and push fast for NRC approval of its flawed PSDAR. We demand SCE pay for a proper DTS while SONGS' Spent Nuclear Fuel is waiting for government off-site storage. That must include purchasing the number of transport casks necessary to move the current 50 canisters that could technically leave the bluff tomorrow. A transport cask would be the only hope if a cask starts to leak. These transfer casks will be needed in 8 years to inspect our current canisters that have been on the ocean in cement over pack for 10 years. How many of our 50 canisters will be pulled to check for corrosion? Right now we are told Nu REG 1927 will allow that none are inspected on site. Tom Palmisano of SCE has admitted the cement overpack in 10 years has needed repair from crumbling. How do you plan in the relicensing to check our specific casks and their location and their manufacturer? How can a GENERIC document meet the needs of SONGS? Your current NuREG 1927 is vague and plans to let relicensing of canisters on the second round go from 20 to 60 years. That would mean on the ocean at Diablo and at SONGS canisters could remain uninspected for 80 years in earthquake zones on the ocean. Your own studies show salt corrosion cracking can begin in two years on the ocean and could be dangerous in 30.

The SCE DCE and PSDAR must include the entire Dry Transfer System (DTS) that will be needed to move the current 50 canisters and eventually all 150 canisters at SONGS ISFSI with the vehicles, cranes, rail road tracks, parking lots for inspection and transfer of all SONGS spent nuclear fuel before any removal of these structures is allowed. Right now the PSDAR lets SCE pull out all the tracks, parking lots, and provides NO transfer casks or vehicles to transfer the dry storage. David Victor CEP chairman said a

vendor could be called in for an emergency if a cask needed fixing and the federal government will come and build the system to remove all the spent fuel. We have the system now, but the PSDAR spends the Ratepayers Trust Fund to remove all of that before the first canister is shipped to the DOE in 2030 which is its earliest optimistic plan for the fuel to start leaving SONGS. Life and property must be protected by NRC regulations from SCE's plan to remove non radiated structures before all spent fuel is removed. No one knows how much money that will take. The priority is spent fuel protection for 240 years before a dime goes to greenfield clean up. Do your job! Protect us against a nuclear accident. The SONGS waste has only been on site from Unit 1 since 1967, Units 2 and 3 since 1983 and 1884. We have only 47 years of experience with this deadly mess for trying to understand what to do with it. Keep the \$3 billion on hand until the spent fuel is removed from SONGS like a SAFSTOR instead of SCE's choice of DECON. No one cares if parking lots and fences and especially water tanks to put out fires remain on site until every drop of spent nuclear fuel is removed from SONGS.

Because of NRC tests, we know corrosion cracking can happen within 16 years and has potential to be dangerous in 30. The cement over-pack on the ocean didn't last 10 years without need of repair. Chernobyl's cement dome had to be replaced after just 28 years at \$1.4 billion. Fukushima's accident was off the probability models worst scenario charts. It was never supposed to be able to happen. At \$90 billion it is still not contained with an ice shield as the next experiment in containment of deadly zirconium fire with radiation going into the ocean. You put in the budget one ISFSI replacement in 240 years???!!!. We have no idea how many times the ISFSI on the ocean with global warming will need repair in 240 years. The Ratepayer's Trust Fund must be maintained as a priority to handle all possibilities until the spent fuel is removed from SONGS. Then the leftover funds can be used for site restoration and license termination.

The SCE PSDAR ISFSI plan is not even safe if the fuel were leaving in a few years. There is no defense in depth plan for the current ISFSI. We are not in the 1980's anymore. We have experienced 9/11 and ISIS. We want a building surrounding the 150 casks. Even if the first casks go out as planned in 2030, we are too vulnerable to sabotage and environmental hazards. We demand the Ratepayer's Trust Fund be used to protect the spent nuclear fuel and have it ready with a DTS for the DOE. It must protect public health, safety AND protect 8.5 million people from "denial of property" to prevent any accident that might keep California citizens from returning to their homes for tens of thousands of years. The SCE Environmental Impact Evaluation (EIE) is ridiculous stating there is no environmental impact beyond small for spent fuel left on the ocean at SONGS for 240 years. The NuREG 2157 GEIS is equally as flawed allowing fuel to be unprotected from sabotage from other than 5 enemy on the ground. The logic must have been based upon enemy wishing to steal the canisters to make weapons, but in today's world they would just blow it up to create economic chaos for the United States. Every time we asked SCE at public meetings about the danger of sabotage, the question was not answered. The 5 Interstate is yards away. The area is vulnerable from the public beach and from the air. If the government creates a repository, and takes the fuel as planned in the DCE, the last canisters are here under this terrible plan until 2050 AT THE EARLIEST. All \$4 billion dollars are gone!! And we in Southern California must just hope a catastrophe does not occur.

We need the DOE and the DOD and the NRC to work with California for an Interim CA spent fuel storage for nuclear fuel from California for our closed Nuclear Reactors' spent fuel. It will need streamlined Environmental Impact Reports. It could be on a military base in our desert where the fuel would be protected from sabotage. All stakeholders and organizations must weigh in. No one wants this horror fuel. We must get it away from the ocean and populations and to a secure location that will not rob the US taxpayer for the next 240 years.

And now about the unspoken Irradiated Fuel Management Plan( IFMP). The Docket Nos 50-361 and 50-362 that was handed to the public Oct 27, 2014 at the NRC Hearing states "The SONGS Units 2 and 3 IFMP and DCE are being concurrently submitted under separate cover letters." The DCE packet was available and discussed at the hearing. The IFMP was not discussed and I never saw a copy of it at the Carlsbad Hearing. I have two versions of it. It is 12 pages that say very little about an aging fuel management plan at SONGS. What is most disturbing is the reference to a contract between SCE and the DOE that is a *standard contract for spent fuel removal*. It states that once the government begins to take US reactors' spent fuel that oldest fuel goes first, but shut down reactors may get priority. And finally, utilities can exchange their priority in the US government DOE. queue. I looked into that and found 2,100 queue positions. SONGS had #3 and #9 for some oversized trucks to remove canisters. SCE's PSDAR says if the government starts taking the fuel in 2024 which is SCE's basis for its DCE that the first 4 canisters will be moved by the DOE in 2030 and the last of the 150 canisters will be removed by the DOE by 2049. A dedicated train to take all 150 canisters would be the safest and cheapest according to what I have read. As long as the spent fuel sits at SONGS on the Bluff, the US taxpayer pays Edison \$7.5 million a year to keep it there. How was this contract established? Who is making sure it is economic for the taxpayers let alone safe for 8.5 million people and not just best for the stockholders of SCE? How can the NRC approve SCE PSDAR and DCE without first forcing the details of the IFMP which is the PRIORITY for the Ratepayer's Trust Fund that SCE is supposed to manage for the people of Southern California with safety against a nuclear fuel accident as first financial priority? Stop the funds from going to any decommissioning activity other than spent nuclear fuel until all spent fuel is safely removed. You have made the Regulations and Rules. Help California create a California Interim Storage Solution.

Respectfully Submitted,

Marni Magda

[marnimagda@gmail.com](mailto:marnimagda@gmail.com)

Please send your comments to stop SCE and the NRC from leaving spent fuel unprotected on the bluff at San Onofre for as long as 240 years with only one planned dry canister replacement and no funds saved for executing this ridiculous plan.

Docket Nos. 50-361 and 50 362 [www.regulations.gov](http://www.regulations.gov), using Docket ID NRC-2014-0223

or mail to: Cindy Bladley, Office Administration, Mail Stop: 3WFN-06-A44M, U.S. Nuclear Regulatory Commission, Washington DC 20555-0001 Comments Accepted until December 22nd