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General Comment

To The NRC:

You are in the midst of yet another leadership shuffle.

But surely each of you can see plain as day, that nuclear power is a failed technology -- just as we see it -- if not better.

The world has already gone mad once, twice, and again (if not more so). Two World Wars and today's threats of terrorism add up to: Stop making more of this waste! If leaving it here, amidst tens of millions of people, is the best you can do (and the final decision for which casks Southern California Edison (SCE) will use will not last forever, but we know you'll keep it here until forever, because you have no place to put it.

As to the rest of the reactor complex, perhaps some (nonnuclear) tests need to be run to establish why "In Plane Fluid Elastic Instability" (IPFEI) occurred in Unit 3 but not in Unit 2, whilst Flow Induced Vibration (FIV) occurred in both units. Also, the software programs were largely found innocent because they were given bad data, but really, they should have red-flagged that data and alerted operators. Furthermore, it's now believed by some experts that the computers were in fact, unable to predict IPFEI even if their input data had been accurate.

The point is, that this failure of the system is systemic in the nuclear industry. San Onofre was operating on "fix-

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on-fail" schedule, letting known problems wait until they became big problems before they would shut down and fix them. That's why we saw plastic bags and mops directing secondary coolant into plastic buckets, and rust nearly all the way through major piping systems that run throughout the plant. Pinched electrical wires that had worked for 30 years finally shorted out in the last few years of life at the plant. Fix-on-fail is the only way to cost-effectively operate an aging nuclear power plant. San Onofre did that for many years, and would have continued if the cost of a third set of steam generators was absolutely prohibitive.

So maybe you should run some tests, and see what sorts of bounds the software programs the computer industry uses would have identified the problem that actually occurred. Don't tear down San Onofre at all. Run it into the ground (without radioactive fuel; use alternate heating sources).

These tests should be paid for by the nuclear industry's insurance company, of course.

Meanwhile, it's about time the NRC and the nuclear industry takes a serious look at the waste problem. You're not seriously planning to leave it on site for even 10 years, are you?!?! Seriously? Why? The cost to America of an accident which caused a fire at a spent fuel facility is astronomical no matter where it happens, but in the middle of Southern California?

Everyone ignored the waste problem nuclear power was creating when it was introduced because you (or your predecessors, the Atomic Energy Commission) promised a technological solution to the waste problem: Mitigation, containment, isolation, reduction, reprocessing, recycling, breeding, rocketing it to the sun, subsea burial, vitrification (for low-level transuranics and fission products), big tanks at Hanford... the list goes on and nothing has worked.

"Yucca Mountain" was the knee-jerk response critics such as myself had to hear from SCE and from the NRC whenever the problem of waste disposal came up at hearings for the past 20 years. That project is stopped, and technologically it collapsed a long time ago: Water seepage, groundwater flow 50 times faster than expected, volcanoes, earthquakes, population increases: each a potential show-stopper, Yucca Mountain suffers from all these problems and more.

So there is no confidence in NRC's policy formerly known as Waste Confidence.

Starting with leaving the waste onsite in 5/8ths inch thick stainless steel canisters that are paper thin compared to the kinetic energy of a jet turbine shaft. And no: Burying them underground isn't good enough.

You have to stop making more. YOU have to close down Diablo Canyon and Palo Verde (partly owned by SCE, who falsify records, skip fire watch patrols, fix things with paper mache and spit, and intimidate any worker who complains about these problems).

YOU have to protect America. YOU have to do your duty.

Reject this PSDAR and require Edison to offer the facility for testing to the industry (globally, not just U.S. nuclear power companies). Require Edison to remove the waste long before Stress Corrosion Cracking of the containers can possibly set in (uh, that appears to be about two years, not even 10, let alone the 60 to 300 years the NRC has already threatened to leave the waste on site for). Require Edison to use thicker cask materials, which are stronger and more durable, because there is a very strong possibility the waste will remain onsite for many centuries: Far beyond the 300 years you've already guessed is possible.

One last request: Stop pulling numbers out of your hat.

Ace Hoffman

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