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RULES AND DIRECTIVES
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Carol Gallagher
Nuclear Regulatory Commission
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RE: NRC Docket 2014-0223

Public Comment – Funding Deficiencies, per Reg. 10-CFR 50.54(bb) – San Onofre SONGS 2 & 3; Multiple Technical Gaps, Substantive Deficiencies in SCE Edison’s proposed Post-Shutdown Decommissioning Activities Report (PSDAR), Site Specific Decommissioning Cost Estimate, Irradiated Fuel Management Plan (dated September 23, 2014), and Absence of Multiple Technical Solutions Currently Available, Absence of Spent Fuel Aging Plan, Contingency Plan and Emergency Response Plan Deficiencies

Dear Ms. Carol Gallagher -

Thank you for accepting supplemental public comment on these important, and possibly precedent-setting decommissioning proceedings proposed by SONGS 2 & 3 Licensee SCE Edison (et.al). I request that my personal comments here be combined, and aggregated with those submitted earlier by Donna Gilmore (dated December 22, 2014), in her link at: https://sanonofresafety.files.wordpress.com/2011/11/docket_nrc_2014-0023_comments_donna_gilmore.pdf

Observations by a Public Stakeholder:

As a public stakeholder from San Diego County, it may be relevant to note that the Licensee’s proposed Decommissioning Plan (DP) and related technical components were already completed, or well underway in southern California, when Licensee hosted public information workshops about San Onofre, and then began a series of Community Engagement Panel (CEP) Meetings last year 2014. As an observer at many long public meetings, speakers from Licensee (SCE), and NRC panelists made it obvious that Licensee was working hard to meet extremely optimistic deadlines.

Meeting(s) usually followed an Agenda/materials prepared by Licensee (SCE) about technical phases of San Onofre (SONGS 2 & 3) Decommissioning Plan. Speakers generally followed carefully scripted slides, and long presentation(s) by multiple NRC and SCE Panelist(s). I observed the Licensee made many unsupported technical assurances, and numerous assertions that the current Decommissioning Plan for San Onofre were based on carefully designed, task sequences developed by highly qualified technical engineers, industry manufacturers (contract vendors), and had been carefully coordinated in advance with elected officials from local agencies in reactor communities. Speakers typically emphasized how all plans were prepared in technical conformance with applicable federal, and state regulations, and carefully reviewed. Speakers also placed emphasis to reflect extensive Emergency Response Plans, with

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features for both Primary, and Secondary Emergency Backup (Fail-Safe) Systems, to ensure continuous operation, and performance of all major infrastructure systems, such as cooling systems, and many more technical Speakers spent extensive time with repetition on system robustness, how highly trained technical operators routinely practiced mock safety drills on a routine basis, to prove performance capability during unlikely emergency events on a semi-annual basis.

At many of these public meetings, I noticed that following extensive presentations by Panelists, there was usually little meeting time left available for public comments or meaningful Q&A segment with questions, or dialogue exchanges. Meeting moderator(s) made modest efforts to allow all speaker(s) a chance to speak, but typically only applied time limit(s) to public stakeholders who raised concerns. Pro-utility speakers were allowed to speak much longer than public stakeholders. On many occasions, I observed there were often public stakeholders who wanted more time spent, in a 'process to more carefully examine the Decommissioning Plan for San Onofre', and to examine various cask alternatives, and other cask design(s) in a more extensive cost/benefit analyses, with technical comparisons. Meeting Moderators usually indicated there was a need to keep the meeting going, and move on.

As a public stakeholder, and an observer from a reactor community in north San Diego County, I was disappointed, and disturbed at how the Licensee's Speakers rehearsed presentations consumed most of the meeting time. It is noted that the series of slides presented by Licensee were not at least pre-distributed, or made publicly available to public stakeholders at least a week prior to the Public Information Meeting(s) on Decommissioning Plans for San Onofre (SONGS 2 & 3).

What I noticed also, was a substantial departure between the Licensee Speakers' rhetoric and talking points, and any actual meeting protocol which should have been applied to better control the meeting, and live up to Licensee's mandatory requirement to engage in genuine and authentic Public Outreach. I was disappointed, because the Speakers seemed to present content that was more suitable for PR marketing campaign, than an objective, credible public education program on San Onofre SONGS 2 & 3 Decommissioning Plan, PSDAR, Cost Estimate, and Timeframe Benchmarks.

It is noted that for decades, Licensee has had the unique cooperation between two regulatory agencies (NRC and CPUC), and permitting agencies at all levels, including local, county, state, and federal agencies, where complex permit sequences are applied. These permit sequences have already been expedited, to accelerate permit processing, so this has become routine practice at San Onofre SONGS 2 & 3. So far, these expedited permit processing sequences enabled Licensee SCE Edison to process permits, and exemptions, using various fast track processing sequences. Many public speakers have already criticized NRC Regulations for years, for being too lax, and allow Licensees far too much discretion. I reaffirm that here, that it applies in NRC's frequent use and approval of Licensee request(s) for exemption(s), enabling Licensee to bypass public review, or application of public comment periods. It

appears, these fast track permitting sequences applied at SONGS 2 & 3 have largely enabled Licensee SCE to develop utility procedures, and predefine each step of complex sequences. It appears that these sequences frequently utilize Licensee requests, which usually obtain routine NRC approvals on exemptions, and essentially pre-defines all future limits, tasks, and improvements to be performed by Licensee.

First, allow me to also observe recent public comments made by the recently retired, former NRC Chairperson Allison MacFarlane which were published in an article contained in New York Times (November 17, 2014). MacFarlane's comments were reflected in NYT article titled: "Nuclear Agency Rules are Ill-Suited for Plant Decommissioning". MacFarlanes address at National Prss Club gave wide ranging look at NRC. She confirmed that NRC's current rules are NOT geared for supervising the decommissioning of nuclear reactors, the task that will occupy much of its time in coming years.

Patricia Borchmann

Gallagher, Carol

From: Patricia Borchmann <patriciaborchmann@gmail.com>
Sent: Friday, January 23, 2015 4:06 PM
To: Gallagher, Carol
Cc: Patricia Borchmann; Donna Gilmore
Subject: NRC Docket 2014-0223
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