

Wengert, Thomas

From: Marni Magda [REDACTED]
Sent: Friday, September 26, 2014 8:20 PM
To: Wengert, Thomas; Gene Stone; Garry Brown; Dan Stetson; Ted Quinn; Marni Magda
Subject: Response for Public Record on the NRC SCE meeting Sept.24 2014
Attachments: NRCSCE Control Room meeting sept242014.docx

Dear Thomas Wengert,

Please find attached my concerns over the meeting I listened to on the phone from 9 am PST to 10 PST. I am sending them for the public record and hope that both the NRC and SCE will stop the direction of the Decommissioning Process that will be dangerous to the future of Southern California.

Regards,

Marni Magda
[REDACTED]
[REDACTED]

September 24, 2014

Thomas Wengert,
Office of Nuclear Reactor Regulations
NRC 301 415-4037
Thomas.Wengert@nrc.gov

Dear Thomas Wengert,

I listened by telephone to the one hour public session of the September 24, 2014 meeting between the NRC and SCE Titled: Forthcoming Meeting with Southern California Edison Regarding San Onofre Nuclear Generating Station (SONGS), Units 2 and 3 (TAC Nos. MF4778 and MF4779)

The purpose of this category 1 meeting was stated "for the licensee to provide an overview of the plans to relocate the current SONGS Main Control Room to a new Command Center during decommissioning and to discuss the regulatory impacts with the NRC staff."

The one hour meeting was baffling. The overheads provided with an Adams Accession number the day before the meeting were nearly impossible to access and print, about 45 minutes wasted on a simple task. At 4:52 am PST a simple pdf file was provided. I was asleep. Then the one hour public meeting took place and the slides were never discussed. The follow up will show 15 or more people in the room in Maryland from the NRC and SCE. There were no printed pages of information that was alluded to as a handout available to the listening public. The hour discussion seemed to cover every disclaimer on why SONGS location is safe to become a permanent nuclear waste dump, but no specifics on the purpose of a new Command Center.

The following ideas and concerns I ask be a part of the public record for this NRC meeting with SCE:

Early in the meeting the NRC stated they had received the day before, September 23, 2014 the SCE PSDAR and DCE for review. They would not be able to speak to those documents during this meeting, but would begin their review and would hold a public meeting in Orange County in late October or early November to discuss their findings about SCE's twenty year decommissioning plan. It comes as a shock and lack of transparency to those of us attending all of the CEP meetings and workshops that SCE submitted on September 23, 2014 its FINAL PSDAR to the NRC for approval. The public attending SCE CEP meetings and many of the CEP members did not believe the issues raised about the PSDAR that was submitted to the public by SCE as a "DRAFT" and discussed over the last months was in any way ready to be sent by SCE as a FINAL PSDAR. Many of us voiced grave concerns about the priorities of the plan especially in light of the August 26, 2014 NCR guidelines that allow spent nuclear fuel to remain on site for 60 years or more after a reactor has been shut down.

The unaddressed issues include but are not limited to the type of casks that will be selected for dry storage, the type of structure and location of the ISFSI pad, the lack of terrorist or technical security or

environmental protection for the abandoned dry storage casks, and the exhaustion of the Ratepayers Trust Fund on dismantling the cosmetics of the site such as parking lots before the spent fuel casks are removed are just some of the concerns not addressed. SCE has no reason to believe the casks will be removed by the government by 2048, yet it bases its budget on that projection. The DCE has no budget left in case of accidents, corrosion cracking, cement overpack deterioration or even budget for a BOND for the Vendor for the estimated cost of at least the three recertification cycles the SONGS casks will need if the federal government leaves the casks on site for as long as the NRC allows, 2073 or 2113.

The current ISFSI plan does not include a building like other countries (Japan and Germany) do to house the dry storage casks to defense in depth protect them from the elements and from terrorists. A hot box or cooling pool must be part of that building plan in case of a leaking cask on site before the fuel is moved by the federal government. The vehicle and rail road connections to transfer the fuel must remain intact until the fuel is gone. Why destroy what we have? The government would then need to find the funds ten years or decades later to build the infrastructure needed to move the fuel. SCE says in case of an accident they will hire a vendor to come deal with the problem.?! The SCE PSDAR and the DCE are a tragic lack of protecting the Ratepayer and the Taxpayer of California. The citizens of California at no time agreed to have a nuclear waste dump on the ocean bluff at San Onofre. The state of California has never licensed the San Onofre site as a nuclear waste dump. 8.4 million people will need to be evacuated if an accident occurs. The current evacuation plan is not possible, and we all know it. We do not care that you believe as the NRC stated in this Sept 24th meeting that "the chance of public radiation harm is low." The key word there is "CHANCE." The fuel is deadly for tens of thousands of generations and the casks by your own (NRC) admission could have serious corrosion cracking problems within 30 years. The longer the casks stay at San Onofre, the harder they are to move. The 50 dry storage casks at SONGs now have never been inspected since they were stored stated Tom Palmisano of SCE, and the cement overpack has needed repair from deterioration and that is only after 10 years. There is no current way to open the 50 casts for inspection or to remove the fuel if a cask begins to fail.

SCE is a utility, doing its job where the rules have changed in thirty years, and we have watched 9/11, Fukushima and now ISIS, bring new realities to our lives. The vague description of SCE's application to move the CONTROL room must not be a temporary monitoring system for the spent fuel pools to be torn down in five or so years. Since SCE is moving forward with its deadly cut and run program we ask that the new Control Room be a defense in depth secure building to house the spent fuel dry storage casks. We ask that you at the NRC force the process that will create a solution for the nation's spent fuel not just leave the dangerous fuel all over the country to "CHANCE" and the problem of the generations 100 years from now. The immediate solution that all government agencies should be working together on the NRC, the DOE, the DOD would be to move all spent fuel from a closed reactor to a military base for an ISFSI to be built there as an Interim solution for true defense in depth protection until the federal government can create a final deposit location.

About today's meeting:

Please keep in mind worse case scenarios and economic efficiency as you permit SCE to make plans. They are a for profit corporation. A moved control room to watch the spent fuel pools must do more than monitor. It needs to be a building that will protect the spent fuel until the federal government takes it away. Not something is to be removed in five years. Until the spent fuel is gone, the citizens of California need defense in depth protection from nuclear fuel accidents of any kind. The building must not just detect fire but have an extinguishing plan, last year's plan when our storm winds blew a fire on to SONGS was evacuation. With all the other buildings gone, we need protection until the fuel is removed from San Onofre. The building code for the reactor domes was earthquake safe against a 7.0 on the rector scale. New faults discovered and new technology to read earthquake data would say a building to house the spent fuel must be greater protection than that, not just a regular California building code. This is irradiated fuel! If this building must last 100 years, it must be protected from future climate changes such as rising oceans, tsunamis and flooding beyond the 30 foot level you at the NRC claimed yesterday was sufficient. Certainly the SCE plan to remove the seawall before the dry storage casks are removed is ridiculous in priorities.

Please focus on back-up systems where multiple problems with less staff could create a catastrophe. For the next five years at least until the fuel is removed from the vulnerable spent fuel pools, more back up is needed. An accident on the Interstate 5 created a 10 hour electrical outage a few years ago. Human error such as may have happened at the catastrophe of WITT could leave SONGS vulnerable if a generator didn't work, and other unforeseen accidents occurred at a single time, derailing the two backup systems for electrical SCE presently has. What water system would be enough if the spent fuel pools lose water? What are the "CHANCES" of that? It doesn't matter. Ask Japan. The impossible can happen and leave us with a third world dead zone. Please protect us from worst case scenarios. Put the priority of spending the trust fund on irradiated fuel management, not site restoration and license termination where three fourths of the budget is now allocated. It is the ratepayers' trust fund. If money to remove the parking lots is not left when the spent fuel is removed, a new generation will deal with it in 2113. A dead zone for ten of thousands of years, they will not.

At the meeting everyone in the room seemed to be looking back for a precedent for SCE request to move the CONTROL ROOM during decommissioning to allow workers to begin to dismantle buildings. Please don't look back for Yankee plants or any reactor in the past for precedent. You spoke of requirement 19 and 1334 something? We need new regulations for a realistic view of spent fuel realities. The federal government's Yucca and WITT fiascos make it clear any final deposit site seems a long way off. If SONGS is going to set a standard that protects America for the next 100 years, it had better be a good one. Since 9/11 and Fukushima we must realize the impossible can happen. Chernobyl after just 28 years had to rebuild its concrete dome, \$1.4 billion. How can SCE have free range with decommissioning SONGS? Why do they get to decide priorities? You at the NRC have admitted you cant tell them how to decommission the plant only advise them if they are breaking a regulation. The SCE Community Engagement Panel has no authority and their concerns seem ignored once the public has listened to them. They are moving ahead with their short sited plan to terminate their license (\$2 billion of the Trust Fund) while leaving Californian's with unprotected deadly spent fuel abandoned on site.

I have listened to your NRC generic waste management plans over the last three years with disbelief that has only grown stronger as I read SCE's EIE that pretends there are no environmental problems here in San Onofre that are not "small." Perhaps with the knowledge of 30 years ago when the reactors came on line that was true. It is not today. California would not allow reactors in our earthquake zones today. To pretend Diablo is safe against earthquake is irresponsible. To ignore the new fault near San Onofre is ignorance at accepting "probability models" at its worst. Even Southern California's fire storms are greater danger today because of vast development of our California wilderness areas. Every September we go into fear for our homes until the first rains make firestorms less likely. 8.4 million people would have to be evacuated if a radioactive accident happened today. I haven't even mentioned terrorists. Can an armor piercing bullet go through the 5/8 inch stainless steel dry storage canister currently proposed by SCE and its surrounding 3 to 5 feet of concrete overpack? A truck bomb was written up by Dan Hirsch in the 1980's "Truck Bomb and Insider Threats to Nuclear Facilities. We are leaving nuclear fuel near the Interstate 5. You said in the meeting we need not worry about tornado missiles? The term is wrong but our hurricanes are growing in violence, the wind and waves like nothing we've seen before. What will four or ten decades bring? You spoke at the meeting of rail road tracks nearby as a danger. That was to set in place a reason to let SCE dismantle the tracks and move away from them. We need the tracks for eventual removal, so focus, please that the fuel needs protection with train tracks nearby, not ripping them out when rail is the safest way to transport dry storage casks. Finally and outside the discussion of this hour long meeting, what has happened to the completion of as stated in your NRC handout the twenty year IN PROGRESS decommissioning of UNIT 1? In the PSDAR and especially the DCE reviewed by the CEP in August, there are no funds that I can see left over to remove the buried unit 1 that SCE proposes to build the expanded ISFSI pad over. Has a recent geological study been ordered to test the integrity of the area before SCE is allowed to abandon spent fuel on it it?

The final message here returns to the Control Room you will approve. It must be built to protect the abandoned dry storage casks for the next 100 years since you, the NRC, have allowed the site to change in nature to a nuclear waste dump until 2073 or 2113 or indefinitely. 8.4 million lives depend upon you.

Respectively submitted,

Marni Magda

[REDACTED]
[REDACTED]

Laguna Beach, CA