

From: Ron Rodarte
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Comments pertaining to Docket No. PRM-72-8
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The information related by Southern California Edison and Tom Palmisano to the California Coastal Commission in a bid to gain approval to commence loading of the HOLTEC dry storage canisters in 2018 was not true in the sense that a known deficiency to the required transportability in any dry storage event was a known entity, and it was not conveyed to the Coastal Commission in a proper or timely manner for their final approval.

The non-related known deficiency in and of itself is a failure of the ground rules for approval by the Coastal Commission, and should require the cessation of the loading and revocation of the SCE permit to load dry cask storage at SONGS.

* The deficiency is illustrated as a known inability to meet the requirement for licensees to be able to unload fuel in both wet and dry fuel handling facilities, in a pool and in a hot cell.

* Tom Palmisano of SCE related in a YouTube video recording of the March 22 Community Engagement Panel that there would be a need for a hot cell to unload canisters.

* A hot cell will be necessary to remove the hot fuel from the thin stainless canisters, as it cannot be accomplished using a pool.

* Edison and the NRC did not reveal to the California Coastal Commission that the unloading of the hot fuel could not be realistically done in a pool.

* That is a fact known by SCE and the NRC prior to their statements to the Coastal Commission and evidenced in the YouTube video. Any permit granted to SCE by the Coastal Commission to proceed with loading spent fuel at SONGS is a permit that must be revoked.

- Edison has no plans to build a hot cell at SONGS.

These deficiencies, and the stated recommendation by the Nuclear Waste Technical Review Board in their report to Congress four months ago in December of 2017 quoted here are the focus of my comment herein:

“Based on the information and findings developed in the report, the Board makes six recommendations [that include monitoring of spent nuclear fuel and the containers it is store in to prevent known explosion and criticality risks and other risks in storage and transport. They acknowledge the DOE is not currently doing this. The NRC approves containers that do not meet the NWPA legal requirement for fuel retrievability and do not meet the NWTRB requirements recommended in this report].” ...from the NWTRB report of December 2017.

1. The thin walled stainless steel casks are insufficient for fuel storage of the type on site at SONGS, the thin walled stainless storage casks are utterly insufficient for transport of the fuel of the type at SONGS, the known deficiencies in the unloading process render the system to be not up to requirements of the NRC and the Coastal Commission, and the inherent design is showing weaknesses in even the slight engineering changes brought on by Edison, case in point would be the breaking of fuel rack spacers in unloaded and non-weight bearing canisters

before any fuel loading.

2. A real concern of the community is that the better technology engineered and tested true at European locations has been discounted entirely by Edison and successfully lobbied against to the NRC. Our future depends on robust material and systems in the Edison dry storage systems for decommission processes that Edison is refusing to consider on a cost basis. Safety has no cost, it is a requirement.

Our lives are not refundable or repayable by a utility corporate board.

3. The dry storage technology of casks produced in Europe, in point the double walled ductile cast iron casks that do have inspection capability, that do have a longer valid life span than single walled stainless steel, and that are not susceptible to cracking as the stainless steel single wall casks have shown the technology to react to salt air by developing precursor cracking conditions within 2 years of placement into storage at a marine environment - these are the storage cask technologies that must be bought back to the table for Edison to discuss a shift from profit margins to life saving proven storage technology at a cost tremendously less costly than a cracked thin wall storage cask and the destruction of billions of dollars in non-reclaimable assets and life in Southern California.

4. To continue loading spent fuel assemblies into non-compliant, non-proven and sealed storage canisters devoid of any proven unpacking procedure is to threaten the lives of a community of millions of Americans for the profitability of a corporate utility.

5. Reject the HOLTEC and thin-wall Stainless Steel dry storage systems for the proven tried and true ductile cast iron double walled dry storage technology summarily cast aside by Edison in their decommissioning cost cutting drive.

Thank you,

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