



May 24, 2018

The Honorable Chairman Kristine Svinicki
U.S. Nuclear Regulatory Commission
Mail Stop O-16B33
Washington, DC 20555-0001

Dear Chairman Svinicki,

Communities surrounding San Onofre Nuclear Generating Station are alarmed by the discovery of a loose bolt during the mandatory pre-loading inspection of a Holtec multipurpose canister (MPC) on February 20, 2018. Four MPCs with the new, defective shim design have been loaded with spent nuclear fuel (SNF) and are currently sited in the San Onofre ISFSI. In order to adequately determine whether or not these canisters and/or their contents are damaged, they must be returned to the spent fuel pool and unloaded.

On March 22, 2018 Tom Palmisano, Chief Nuclear Officer of Southern California Edison, stated that nobody has ever unloaded commercial SNF. He estimated that it would take 2 to 3 years to develop and pilot such a technique. Hence, it is currently impossible to inspect these four loaded canisters. In addition, Mr. Palmisano indicated that the ability to transport these canisters is unknown.

The issue of foreign material found inside a MPC leads us to question the cooling capability of the four loaded MPCs with the defective shims. We are seriously concerned about the ability to transport the SNF to an interim or permanent repository. The MPC technology is not developed enough to be used for long-term storage.

An independent third-party report on the effects of MPC standoff bolt shim failures over time on the cooling capability and transportability of SNF is essential to avoid another engineering failure like that of the San Onofre steam generator fiasco of 2012.

We contend that continued loading of additional canisters into the ISFSI is irresponsible and a violation of the NRC Certificate of Compliance. We implore the NRC to perform a detailed analysis of these shim issues, to publicly present their findings, and detail any associated risks to public safety.

We charge the NRC to ensure utilities implement solutions which avoid further damage to MPCs and fuel assembly contents that would preclude the ultimate transport of the SNF to an interim or permanent repository.

Sincerely,

Handwritten signature of Bart Ziegler.

Bart Ziegler, PhD President

Handwritten signature of Rita Macdonald.

Rita Macdonald, reliability engineer

Handwritten signature of Tom English.

Tom English, PhD electrical engineering

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