

**From:** [Dricks, Victor](#)  
**To:** [Murray, Jenny](#); [Tannenbaum, Anita](#)  
**Subject:** FW: San Onofre Inspection  
**Date:** Friday, August 31, 2018 12:28:36 PM  
**Attachments:** [SONGS CHARTER.pdf](#)

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Please enter this into ADAMS and make it publicly available in the SONGS docket.

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**From:** Dricks, Victor  
**Sent:** Friday, August 31, 2018 12:27 PM  
**To:** 'Gary Headrick' <[gary@sanclementegreen.org](mailto:gary@sanclementegreen.org)>  
**Subject:** RE: San Onofre Inspection

Hi Gary! Thanks for your e-mail and questions regarding the Aug. 3 fuel handling event at the San Onofre Nuclear Generating Station. We have received many inquiries and detailed questions from members of the public regarding this event and regret that we are unable to respond to them at this time. We do not have answers to all of your questions and will be exploring areas related to those during the special inspection that will begin on Sept 10. We are attaching the charter authorizing the special inspection in case you have not seen it. Southern California Edison officials have told the NRC that they have stopped fuel loading operations until NRC completes its review of the incident. The team will evaluate the licensee's cause analysis and adequacy of corrective actions. We think that many of your questions will be answered in an inspection report documenting the team's findings that will be publicly available within 45 days of the end of the inspection.

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**From:** Gary Headrick [<mailto:gary@sanclementegreen.org>]  
**Sent:** Saturday, August 25, 2018 7:31 PM  
**To:** Dricks, Victor <[Victor.Dricks@nrc.gov](mailto:Victor.Dricks@nrc.gov)>  
**Subject:** [External\_Sender] San Onofre Inspection

Hi Victor,

I was glad to see your name attached to this effort. I hope all is well with you. Last I heard you were off to some other part of the country.

I was on a call with Tom Palmisano yesterday with Donna Gilmore (and my wife Laurie), to go over some of the community's concerns regarding the "near miss". He said to check with the NRC on a couple of my questions. One is if the public will have a chance to hear the NRC findings before they begin moving fuel again. What are the chances of the NRC holding a public meeting before the team leaves town? We don't want to wait 45 days to get a clear understanding about how things will proceed before they actually start up again. Edison shouldn't be allowed to proceed until we've had a chance to review the improved procedure. It also became clear that if the canister fell 18 feet and caused damage to the container there is no contingency plan in place. I hope the NRC will be reviewing this most important concern we have. Dave Lochbaum stated (see below) that the fuel assemblies would likely sustain damage, but couldn't say how quickly a solution would be needed. We would expect that a contingency plan would be needed even if there was a slight chance that a canister drop might occur. Now we know that there is much more than a slight chance, since the "near miss". Will the NRC team also be researching the possible results of fuel being damaged inside a canister that drops more than 11 inches, requiring an inspection of the fuel, per NRC regulations? If fuel cladding is compromised or the grid holding fuel assemblies apart has fallen there is the potential for criticality, even if the canister is still intact. If the canister is leaking, I understand that if only 5% of the interior space holding helium is replaced with water or air, there could also be a hydrogen explosion. Are these the types of things you will be analyzing?

Secondly, we understand that there are only two ways to deal with a damaged canister that needs to be unloaded. Return it to the SFP for reloading or use a hot cell to do the same on land. Since the fuel is still very hot coming out of the pool, Tom explained that reflooding the canister could be very difficult, but technically possible. Will you be looking into that now so we can do it if an emergency comes about? Tom also stated that they will be removing the pools after they are empty, unless the NRC requires them to remain for future emergencies. Will the NRC require that, since the other option for a hot cell does not exist? Or will you require them to build a hot cell before destroying the pools?

Looking forward to hearing from you,  
Gary

From David Lochbaum on Mon, Aug 13, 1:00 PM

Hello Gary:

Regarding the contingency plan, I suspect that none exist because there are so many scenarios as to what gets damaged to what extent.

So, owners would not likely endeavor to develop contingency plans for every possible scenario.

But what they should be forced to consider (and publicly document) is whether they'd have sufficient time to develop and implement a contingency plan tailored to cask drops. Their existing analyses show that fuel inside the canister could be damaged if dropped. Okay, the safety analyses assume the fuel is intact. How long can a canister safely store damaged fuel? If

that period is long, there's likely time to develop the applicable contingency plan. But if that time is or could be short, that would argue for pre-existing contingency plans.

I like the idea of pursuing this matter. I need to think about leverage points likely to induce NRC into making the changes.

Thanks for the discussion. It's been helpful to me,

Dave Lochbaum