From:	Dricks, Victor
To:	Tannenbaum, Anita
Subject:	FW: San Onofre NRC Inspection Report flawed -- Holtec system must be recalled
Date:	Friday, March 22, 2019 10:14:44 AM

Please enter into ADAMS

Victor Dricks
Senior Public Affairs Officer
U.S. Nuclear Regulatory Commission / Region IV
1600 E. Lamar Blvd.
Arlington, Texas 76011
(817) 200-1128

From: Dricks, Victor
Sent: Friday, March 22, 2019 8:26 AM
To: Donna Gilmore <donnagilmore@gmail.com>
Subject: FW: San Onofre NRC Inspection Report flawed -- Holtec system must be recalled

Dear Ms. Gilmore:

NRC's March 18, 2019 inspection report summarized our selected examination of procedures and representative records, observations of activities, performance of independent radiation measurements, and interviews with personnel. Specifically, the inspectors reviewed decommissioning planning activities for SONGS Units 1, 2, and 3, controls for spent fuel safety, implementation of the maintenance program under the decommissioning general contractor, and organization and management systems. That inspection did not address the August 3, 2018 fuel-loading event, which was the subject of an NRC special inspection. The findings of that special inspection were documented in a report issued on Dec. 19, 2018: https://www.nrc.gov/docs/ML1834/ML18341A172.pdf and were the subject of a webinar conducted on January 24, 2019. The agency's enforcement decision on the violations identified in that report will be discussed at Monday's webinar.

Victor Dricks
Senior Public Affairs Officer
U.S. Nuclear Regulatory Commission / Region IV
1600 E. Lamar Blvd.
Arlington, Texas 76011
(817) 200-1128

From: Donna Gilmore [mailto:donnagilmore@gmail.com]
Sent: Wednesday, March 20, 2019 5:26 PM
To: Mike Levin <mike@mikelevin.org>; Jonathan Gilbert <jagilbert36@gmail.com>; Francine Busby <Francine.Busby@mail.house.gov>; Kyle Krahel <Kyle.Krahel@mail.house.gov>; Heather J. Hutt (Harris) <heather_hutt@harris.senate.gov>; Sean Ansted (Harris)

<Sean_Ansted@harris.senate.gov>; Joseph Street <joseph.street@coastal.ca.gov>; Cynthia Herzog <CEQAcomments@slc.ca.gov>; bettytyee@sco.ca.gov; jennifer.lucchesi@slc.ca.gov; kbosler@dof.ca.gov
Cc: Toni Iseman <tiseman2@aol.com>; Steve Swartzs <swartzs@san-clemente.org>; Debra Lewis <lewisdpcc@gmail.com>; Shari Horne <sharilhorne@gmail.com>; Rita Conn <ritamconn@gmail.com>; Judy E. Jones <judyjones414@gmail.com>; carol.linderfelt@energy.ca.gov; justin.cochran@energy.ca.gov; governor@governor.ca.gov; CHAIRMAN Resource <CHAIRMAN.Resource@nrc.gov>; CMRBARAN Resource <CMRBARAN.Resource@nrc.gov>; Shane, Raeann <Raeann.Shane@nrc.gov>; CMRCaputo Resource <CMRCaputo.Resource@nrc.gov>; NRC Commissioner Kristine L. Svinicki <CMRSVINICKI@nrc.gov>; Len R. Hering <lrhering@aol.com>; Dr Tom English <tdenglish3@sbcglobal.net>; Subrata Chakraborty <subrata@ucsd.edu>; Torgen Johnson <torgenjohnson@hotmail.com>
Subject: [External_Sender] San Onofre NRC Inspection Report flawed -- Holtec system must be recalled

This new 3/18/2019 NRC inspection report, looks like it was written for Edison to use as cover with the State Lands Commission as proof the NRC claims everything is in compliance with NRC regulations at San Onofre. This is outrageous.

It says Edison promised to fix its procedures for the almost drop.

It TOTALLY ignores the fact the canister downloading system unavoidably damaged the walls of EVERY canister downloaded into this poorly engineered Holtec system. This significantly shortens the life of every canister loaded. This defective system was approved by the NRC, even though it is a lemon and must be recalled.

The NRC knows the root cause of the scratches, scrapes and gouges is the lack of a precision canister downloading system. However, they refuse to admit the only way to solve this problem is to recall the system. Once cracks start in stainless steel, they can continue to grow through the wall in 16 years (8/5/2014 NRC meeting summary). Growth rate is much faster with hotter canisters or deeper scratches and gouges. Also, even small scratches will cause galvanic corrosion, resulting in accelerated cracking.

Our ratepayer funded Decommissioning Trust Fund has no money allocated to replace these canisters.

Therefore, our California government needs to freeze the Trust Fund until Edison replaces these thin-wall canisters with proven thick-wall transportable storage casks designed to be inspected, maintained and monitored to prevent problems and to ensure transportability. Cracking canisters are not safe for storage or transport. The NRC is ignoring its own regulations if it allows otherwise.

The CPUC can reallocate some of the over 4 billion dollar comingled trust fund to replace these defective canisters.

Edison also needs to agree to keep the spent fuel pools until they have another means to replace failing canisters.

These are financial issue totally within the jurisdiction of the CPUC. The NRC must approve

the new system for safety reasons, but it's the responsibility of California to ensure our funds are used prudently.

Jerry Brown refused to do this. Hopefully, Gavin Newsom will do a better job.

One noted problem in the Inspection report reveals the continuing safety culture problems at San Onofre -- employees afraid to report safety problems for fear of retaliation.

> *The licensee's contractors conducted employee surveys in 2018. The survey results indicated strong awareness of the ECP programs.* ***Potential weaknesses included a perception of retaliation, reluctance to report issues of concerns, and timely resolution of issues through the condition report process.*** *The survey administrators provided proposed corrective actions to address the neutral and potentially negative survey results.*

San Onofre - NRC Inspection Report - No Violations, 3/18/2019
ML19071A349

https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19071A349

Donna Gilmore
SanOnofreSafety.org
949-204-7794
donnagilmore@gmail.com

-------- Original message --------
From: Donna Gilmore <donnagilmore@gmail.com>
Date: 3/20/19 2:07 PM (GMT-08:00)
To: decommission@sanonofre.com, NFC Summit Group <nirs@sanonofre.com>
Cc: Ace Hoffman <acehoffman@gmail.com>, Michelle Anderson <msmichelle@cox.net>, Richard Van Every <richvanevery@me.com>
Subject: Fwd: San Onofre - NRC Inspection Report (No Violations)

This new 3/18/2019 NRC inspection report, looks like it was written for Edison to use as cover with the State Lands Commission as proof the NRC claims everything is in compliance with NRC regulations at San Onofre. This is outrageous.

It says Edison promised to fix its procedures for the almost drop.

It TOTALLY ignores the fact the canister downloading system unavoidably damaged the walls of EVERY canister downloaded into this poorly engineered Holtec system. This significantly shortens the life of every canister loaded. This defective system was approved by the NRC, even though it is a lemon and must be recalled.

The NRC knows the root cause of the scratches, scrapes and gouges is the lack of a precision canister downloading system. However, they refuse to admit the only way to solve this problem is to recall the system. Once cracks start in stainless steel, they continue to grow through the wall in 16 years. Even much faster with hotter canisters and deeper scratches and

gouges. Also, even small scratches will cause galvanic corrosion, resulting in accelerated cracking.

Our ratepayer funded Decommissioning Trust Fund has no money allocated to replace these canisters.

Therefore, our California government needs to freeze the Trust Fund until Edison replaces these thin-wall canisters with proven thick-wall transportable storage casks designed to be inspected, maintained and monitored to prevent problems and to ensure transportability. Cracking canisters are not safe for transport.

The CPUC can reallocate some of the over 4 billion dollar trust fund to replace these defective canisters.

Edison also needs to agree to keep the spent fuel pools until they have another means to replace failing canisters.

These are financial issue totally within the jurisdiction of the CPUC. The NRC must approve the new system for safety reasons, but it's the responsibility of California to ensure our funds are used prudently.

Jerry Brown refused to do this. Hopefully, Gavin Newsom will do a better job.

One noted problem in the Inspection report reveals the continuing safety culture problems at San Onofre -- employees afraid to report safety problems for fear of retaliation.

> *The licensee's contractors conducted employee surveys in 2018. The survey results indicated strong awareness of the ECP programs.* ***Potential weaknesses included a perception of retaliation, reluctance to report issues of concerns, and timely resolution of issues through the condition report process.*** *The survey administrators provided proposed corrective actions to address the neutral and potentially negative survey results.*

Please sign and share petition on SanOnofreSafety org.

San Onofre - NRC Inspection Report - No Violations, 3/18/2019
ML19071A349

https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19071A349

Donna Gilmore
SanOnofreSafety.org
949-204-7794
donnagilmore@gmail.com

-------- Original message --------
From: Michael J Keegan <mkeeganj@comcast.net>
Date: 3/20/19 10:35 AM (GMT-08:00)
To: NIRS Summit <Nirs@sanonofre.com>
Subject: San Onofre - NRC Inspection Report (No Violations)

San Onofre - NRC Inspection Report - No Violations
ML19071A349

https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19071A349

Document Title:	San Onofre - NRC Inspection Report 05000206/2019001, 05000361/2019001, and 05000362/2019001.
Document Type:	Inspection Report Letter
Document Date:	03/18/2019