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**From:** Kale Walker <ggchappykale@yahoo.com>  
**Sent:** Friday, May 24, 2019 4:30 PM  
**To:** Howell, Linda <Linda.Howell@nrc.gov>  
**Subject:** [External\_Sender] Holtec SONGS NRC

Dear Linda,

Of course Southern Californians are shocked and disappointed that the NRC approved the resumption of loading at San Onofre. The NRC never even answered the public's questions from the webinars, or the more technical questions via email. In an NRC phone conference, you actually told me you had received my questions and would be responding..... but that has not happened.

With each of the many mishaps at the SONGS Holtec ISFSI (the defective shims, the 'near-drop', the scraped and gouged canisters) more serious concerns with the canister system were revealed to the public.

We were hopeful, with the 'stop-load', that the NRC would have taken the opportunity to do a more comprehensive analysis of their regulations and enforcement, the Holtec system and the growing national problem of nuclear waste storage and transport.

But we now know the NRC is approving nuclear waste to be stored in the following conditions:

1. Canisters are not ASME N3 certified. (Yet NRC and Holtec state which particular ASME codes it meets or allegedly surpasses.)
2. Canisters are not 'Monitored Retrievable Storage' as required by Law.  
The NWPA requires DOE to ultimately take ownership, and the DOE requires MRS, and the DOE does not consider the canisters to be an acceptable form of packaging for the DOE to take ownership. see below
3. Holtec is not in compliance with their own official Final Safety Analysis Report.  
Holtec's lack of a precision downloading system does exactly what the FSAR promises it won't do - scrape and gouge the canisters. We expected an official NRC technical review for changes to be made to an FSAR.
4. And the canisters and fuel cannot be inspected before transport, as required by the NRC.
5. etc etc etc -

How can these canisters of HiBurnup Fuel be safely transported ANYWHERE??

We STILL have not received response to the technical questions regarding explosion risks with HiBurnup fuel in storage and transport.

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18269A037>

Meanwhile, Edison and NRC brazenly state that the radioactive spent fuel waste poses ZERO risk

outside SCE boundaries.

Sadly, it appears NRC decisions are unduly influenced by the industry.

Are certain people in the NRC allowing the industry's influence and financial concerns to override public safety considerations? yikes!

I wonder if you support the decision to allow loading to resume. You seem like a person of conscience who takes your responsibility seriously, and I was hoping someone at your level in the NRC would have the courage to do the right thing.

Ben Franklin aptly explained the importance of small decisions and actions influencing the larger course of events:

**For Want of a Nail**

For want of a nail the shoe was lost.

For want of a shoe the horse was lost.

For want of a horse the rider was lost.

For want of a rider the message was lost.

For want of a message the battle was lost.

For want of a battle the kingdom was lost.

And all for the want of a horseshoe nail.

— Benjamin Franklin

Sincerely,  
Kalene Walker



**This is a technical presentation that does not take into account the contractual limitations under the Standard Contract. Under the provisions of the Standard Contract, DOE does not consider spent fuel in canisters to be an acceptable waste form, absent a mutually agreed to contract modification. To ensure the ability to transfer the spent fuel to the government under the Standard Contract, the individual spent fuel assemblies must be retrievable for packaging into a DOE-supplied transportation cask.**