CHAIRMAN Resource

From: Donna Gilmore <donnagilmore@gmail.com>
Sent: Tuesday, June 04, 2019 10:03 AM
To: Teri Sforza - OC Register
Cc: Howell, Linda; Douglas R. Bauder; Layton, Michael; CHAIRMAN Resource; CMRBARAN Resource; CMRCaputo Resource; CMRWright Resource; NRC Commissioner Stephen Burns; CHAIRMAN Resource; Joseph Street; Mike Levin; Len R. Hering; Debra Lewis; Toni Iseman; Dan Bane; Robert 'Bob' Einziger
Subject: [External_Sender] Scratches on nuclear storage canisters at San Onofre pose no problems, NRC says after its own analysis – Orange County Register

Teri,

Thanks for writing this article on the Holtec canister gouging issue. However, I find it odd that the NRC has issued no safety analysis report on the gouging of the canisters. This is a materials engineering, structural engineering, and pressure vessel engineering issue, yet all NRC Linda Howell talked about in the webinar was a statistician.

I have asked for the NRC's written technical safety analysis report, but my question was ignored during the webinar. Maybe you will have better luck asking for it, or does it even exist?

I asked about the root cause of the gouging, but it was clear by the NRC's vague response they are refusing to acknowledge the role of the lack of a Holtec precision canister downloading system, making it impossible for the workers to avoid gouging the walls of every canister the entire length of the canister walls.

The NRC is ignoring and apparently refusing to document the root cause of the Holtec gouging. Why?

Howell ignored my question of "what is the specific ASME Nuclear Pressure Vessel Code used for in-service pressure vessels that indicates this gouging is acceptable?" I have read the ASME N3 pressure vessel codes and don't see such a code that would allow this. An NRC engineer asked Holtec for this information, but I have not seen any written correspondence or analysis between the NRC and Holtec on this issue.

The Edison document included in this OC Register article makes lots of claims, but with no evidence. Where is the written NRC safety analysis of this Holtec design flaw? Or of this Edison report? Who wrote the report? I see no names of professional engineers willing to sign their name to this unsubstantiated report.

For the NRC to approve thin-wall canisters that cannot be inspected or maintained inside or outside is unacceptable. Now to allow gouging that will significantly reduce the lifespan of these thin-wall canisters is outrageous.

The NRC is ignoring their employees' concerns about galvanic corrosion from the scraping of the carbon steel guide ring against the stainless steel canisters, and the many other known failure modes for these uninspectable, unmaintainable, untransportable cracking thin-wall canisters.

All thin-wall canisters must be replaced with thick-wall metal transportable storage casks, stored in hardened buildings for additional environmental and security protection. To do otherwise is to promote the destruction of Southern California.

To make matters even worse, the NRC and Coastal Commission plan to allow Edison to destroy the spent fuel pools, the only on-site method approved for replacing canisters.

Claims they can store leaking canisters inside some type of sealed metal overpack is not an approved system. Canisters and fuel would likely overheat in this "Russian Doll" scenario, since the convection air cooling system would be lost.

The NRC, Edison and the Coastal Commission are making it impossible to ever transport this waste to a safer location, yet no one is being held accountable for another of Edison's billion dollar boondoggles.

https://www.ocregister.com/2019/06/03/scratches-on-nuclear-storage-canisters-at-san-onofre-pose-no-problems-nrc-says-after-its-own-analysis/

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