

From: [Paul](#)
To: [Liu, Tilda](#)
Cc: [Paul M. Blanch](#); [Skeen, David](#); [Charles Langley](#); [Nina Babiarz](#); [Spicher, Terri](#); bartley.malion@nrc.gov
Subject: [External_Sender] Formal request for Zoom Petition Review Board meeting regarding 2.206 Petition Request dated 10/13/2020
Date: Wednesday, January 20, 2021 2:40:06 PM
Attachments: [PRB Transcript 1-28-2015 copy.pdf](#)

Dear Tilda Liu:

I am writing to you on behalf of myself and Charles Langley of Public Watchdogs.

We are looking forward to participating in a ZOOM type meeting with the NRC's PRB related to our October 13, 2020 2.206 petition.

We request seven days notice prior to the meeting and we will supply a copy of the presentation to the PRB 2 days prior to the meeting.

I expect the meeting will be similar to the PRB meeting held on January 28, 2015 (transcript enclosed) and others may make brief statements subject to approval by me.

I will be asking questions of the PRB consistent with MD 8.11 statement *"the PRB will give the petitioner and the licensee an opportunity to ask the PRB questions related to the process for evaluating and reviewing 2.206 petitions"*.

Many of these questions will be identified in writing prior to the PRB meeting.

I have invited Mr. David Skeen of your office to participate as we have formally discussed the 2.206 process in great detail and he will be issuing a summary of our latest discussion that took place prior to the Holidays.

In your email you stated: *"Specifically, the concerns expressed in this petition have previously been evaluated or considered in NRC staff licensing reviews and in the evaluation of prior 2.206 petition requests submitted by Public Watchdogs"*

The PRB is requested to transmit the documentation that *"...have previously been evaluated or considered in NRC staff licensing reviews..."*

The questions below from Mr. Langley's email to you will also need to be addressed.

In closing, please provide us with a date for the PRB meeting and I will forward a copy of my presentation to you.

Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pdblanch@comcast.net
860-236-0326
Cell 860-922-3119

Begin forwarded message:

From: Charles Langley <langley@publicwatchdogs.org>
Subject: Re: Query on Meeting Logistics RE: Formal request for Zoom Petition Review Board meeting regarding 2.206 Petition Request dated 10/13/2020
Date: January 19, 2021 at 7:14:50 PM EST
To: "Liu, Tilda" <Tilda.Liu@nrc.gov>
Cc: Paul <pdblanch@comcast.net>, Nina Babiarz <ninababiarz@outlook.com>

Dear Tilda Liu,

The email confirms that we expect to have PowerPoint or other materials for the Zoom Petition Review Board conference, but have not prepared any "written materials" as of this date, other than the original 2.206 Petition, which we encourage you to publish on the NRC meeting website.

1) Does the NRC guarantee the active participation of the PRB members?

At the last Petition Review Board meeting for Public Watchdogs, an NRC Petition Review Board member was counted in the PRB roll call as an attendee. It became apparent, however, that she had no intention of listening to the evidence. After she introduced herself, the employee put her phone on "hold" to create the illusion of attendance. As a result, the entire meeting was "put on hold" and the audience was forced to listen to the NRC employee's loud "hold music" for an extended period of time.

Question: What steps has the NRC taken to make certain that the members of the Petition Review Board are actually present, listening, and watching this conference?

2) What is the deadline for providing our presentation materials?

You explained that you would like to publish our "written presentation" along

with the NRC announcement. This may not be possible. We have not yet developed our presentation materials for the Petition Review Board. It is likely we will be developing and refining those materials until the day of the hearing. Therefore, sending the materials in advance seems premature, because the content is subject to change.

3) Public access to the Zoom meeting and the complete video/audio of the meeting

Zoom allows automatic recording of the PBR video and audio. Will the NRC be recording and publishing the Zoom video to the NRC web site?

Many Thanks,

Charles Langley, Executive Director
Public Watchdogs (858) 384-2139
www.publicwatchdogs.org
7867 Convoy Court, Suite 302, San Diego CA 92111

On Tue, Jan 19, 2021 at 8:15 AM Liu, Tilda <Tilda.Liu@nrc.gov> wrote:
Mr. Langley,

Thank you for your reply. I will get back to you regarding options for time/date of the meeting with PRB. For meeting planning purpose, will you be using/giving any written presentation during the meeting with NRC PRB members? If so, we would need the info ahead of the meeting, so that we may post on the NRC public meeting website.

Please advise, and thanks again.

Tilda Liu

From: Charles Langley <langley@publicwatchdogs.org>
Sent: Friday, January 15, 2021 2:01 PM
To: Liu, Tilda <Tilda.Liu@nrc.gov>
Cc: Paul <pdblanch@comcast.net>; Nina Babiarz <ninababiarz@outlook.com>
Subject: [External_Sender] Formal request for Zoom Petition Review Board meeting regarding 2.206 Petition Request dated 10/13/2020

Dear Tilda Liu,

Public Watchdogs requests a meeting of the Petition Review Board via Zoom or other video teleconference for the Public Watchdogs 2.206 Petition submitted October 13, 2020, consistent with MD 8.11.

Please provide a couple of options for times and dates, and "reply to all"

Charles Langley, Executive Director

Public Watchdogs (858) 384-2139
www.publicwatchdogs.org
7867 Convoy Court, Suite 302, San Diego CA 92111



On Tue, Jan 12, 2021 at 12:01 PM Liu, Tilda <Tilda.Liu@nrc.gov> wrote:

Mr. Langley,

Regarding the 2.206 petition request that you submitted by letter dated October 13, 2020, on behalf of Public Watchdogs, the Petition Review Board (PRB) has completed its initial assessment in accordance with NRC Management Directive (MD) 8.11, "Review Process for 10 CFR 2.206 Petitions."

Your petition requested that the NRC take enforcement action in the form of Demands for Information to Southern California Edison (SCE), Holtec, and all other licensees, using the Holtec HI-STORM UMAX storage system, whose licensing documents (Final Safety Analysis Reports and/or Safety Evaluation Reports) claim that there are no credible events that could result in the release of radioactive materials from the UMAX storage system. In addition, your petition request stated that the NRC must require SCE and its subcontractors to respond with information and objective analyses which validate this claim to demonstrate

that confinement of radioactive material under normal, off-normal, and credible accident scenarios be reasonably maintained, for a specific list of events.

The PRB's initial assessment is that your petition request does not meet the following MD 8.11 Section III.C.1(b)(i) criterion for petition evaluation:

The issues raised by the petitioner have not previously been the subject of a facility-specific or generic NRC staff review;

Specifically, the concerns expressed in this petition have previously been evaluated or considered in NRC staff licensing reviews and in the evaluation of prior 2.206 petition requests submitted by Public Watchdogs.

Consistent with NRC MD 8.11 Section III.F, we extend you an opportunity to clarify or supplement the petition in a public meeting with the PRB. If you decide to take advantage of this opportunity, the meeting with the PRB may be conducted via telephone or remotely online. Please reply by January 19, 2021, whether you would like to meet with the PRB. If you do, and your schedule permits, we offer a time between the period of February 8, to February 16, 2021, for this meeting. Note that the NRC staff is not available on February 15, 2021, as it is a Federal holiday.

Thank you,

Tilda Liu

Division of Fuel Management (DFM)

Office of Nuclear Material Safety and Safeguards

* R-II | (404-997-4730 | Tilda.Liu@nrc.gov