

From: [Charles Langley](#)
To: [Liu, Tilda](#)
Cc: [Paul](#); [Nina Babiarz](#)
Subject: [External_Sender] New information on October 13, 2021, 10 CFR 2.206 Petition by Public Watchdogs
Date: Tuesday, March 30, 2021 1:06:25 PM

Dear Ms. Liu,

We have new information related to our October 13, 2021 10 CFR 2.206 petition.

This information is the result of a March 18, 2021 SONGS "Community Engagement Panel Meeting," which was recorded by the licensee, Southern California Edison at www.songscommunity.com, and also as a result of new NRC disclosures made during our recent PRB meeting.

New issue 1: Water intrusion into canisters is an unanalyzed condition

In an official email from the NRC to Tom Palmisano of SCE discussing:

RE: Criticality impact of thin-wall dry storage canisters

Date: Thursday, December 21, 2017 2:15:00 PM the NRC stated:

"the criticality safety control during storage **does rely on the exclusion of water** from the canister, and that is what led the NRC staff to ask Holtec to evaluate how criticality will be prevented." (**emphasis** ours).

The radiological impact of criticality in the event of internal flooding and loss of canister integrity has not been analyzed. The risk of this event has not been assessed by either the NRC or the licensee other than unsupported statements that this event is "not credible." This is an unanalyzed event.

QUESTION: What is the radiological impact of an inadvertent criticality in the event of a loss of canister integrity and internal flooding?

New issue 2: Emergency response equipment inventory

In its FSAR Technical Specifications (TS) the licensee discusses recovery from an analyzed flooding event as inserting some type of suction device to remove water and debris. This procedure is allegedly discussed in the site emergency plan.

FOIA 2021-000114 requested this site emergency plan and the FOIA branch provides a reference to this document at <https://www.nrc.gov/docs/ML2025/ML20255A126.html>.

Unfortunately this emergency plan does not discuss flooding or recovery from a flooding event.

The licensee appears to have no equipment such as pumps, special high temperature hoses, disposal provisions for radioactive water, pure water supplies, readily available and sufficient time to prevent fuel damage that is stated to be either 8 or 32 hours according to the analysis summary.

QUESTION: Please provide a list of the equipment on site at the San Onofre ISFSI for recovery from a flooding event. Please identify the suction device used for removing sand, mud, water and gravel from the Canister Enclosure Cavity.

New issue 3: Analyses supporting "not credible" finding

The licensee has submitted its FSAR and COC for the ISFSI. The NRC has approved these documents. Within these documents the licensee has stated numerous times that failure of the Holtec Canisters is "Not Credible" in response to the integrity requirement of 10 CFR 72.236(l) therefore avoiding any and all requirements to assure integrity. The NRC has formally declined to answer these questions. The NRC has stated in writing that it agrees with this statement.

The licensee and the NRC have avoided addressing all the requirements of 10 CFR 72.122 and 10 CFR 72.236 by making an unsupported statement that loss of integrity is "not credible."

QUESTION: Please identify a fact-based analysis that supports the statement that loss of canister integrity is "not credible."

New issue 4: Seawall as a damage barrier for spent nuclear fuel

The sea wall between the SONGS ISFSI and the beach is considered to be a component important to safety as defined in 10 CFR 72.3 *"to prevent damage to the spent fuel, the high-level radioactive waste, or reactor-related GTCC waste container during handling and storage;"*

This "sea wall" is not designed, constructed, tested to assure its assumed capability to restrain or prevent the impact of the forces of a storm surge or a tsunami as required by 10 CFR 72, Subpart G—Quality Assurance. There is no docketed information discussing compliance of this wall as required.

The licensee must provide documentation that this barrier, assumed to prevent flooding, is designed and qualified to meet its intended function.

QUESTION: Please identify the documents establishing that a seawall prevents damage to spent fuel, and is therefore a "component important to safety."

QUESTION: Please provide documentation proving that the seawall is engineered to withstand a tsunami or other large wave.

Respectfully Submitted,

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