

## **CALIFORNIA COASTAL COMMISSION**

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# **W9a**

### **SAN ONOFRE NUCLEAR GENERATING STATION**

### **SPENT FUEL STORAGE BRIEFING**

**OCTOBER 11, 2017**

### **ADDITIONAL CORRESPONDENCE**

**(THROUGH OCTOBER 6, 2017)**

October 6, 2017

Dr. Joseph Street  
California Coastal Commission  
45 Fremont, Suite 2000  
San Francisco, CA 94105

**Re: SCE Comment for October 11 Meeting Agenda Item W9a – SONGS ISFSI**

Dear Dr. Street and Members of the Commission:

I write on behalf of Southern California Edison (SCE), decommissioning agent for the San Onofre Nuclear Generating Station (SONGS), regarding the informational agenda item for the October 11 California Coastal Commission (CCC) meeting on the coastal development permit (CDP) for the SONGS independent spent fuel storage installation (ISFSI) that was approved by the CCC in October 2015. SCE is committed to exploring opportunities to move the used nuclear fuel from SONGS as soon as feasible and safe. In the meantime, SCE will continue to safely store used fuel on site.

SCE appreciates the opportunity to participate in the October 11 meeting. In addition, and after reviewing some of the correspondence the CCC received and posted on its meeting agenda webpage, I would like to highlight some facts associated with spent fuel in the interest of addressing a few points of confusion we have noticed in public comments.

Current Monitoring and Future Inspections

Some commenters have raised questions about the inspection and maintenance methods that are currently or will be employed for the dry storage at SONGS.

The concrete storage modules in the existing AREVA NUHOMS dry storage system currently undergo routine maintenance including 24/7 security monitoring, periodic radiation surveys, continuous temperature monitoring, daily walk-downs to ensure the passive air intake vents are clear of obstruction, and periodic inspections.

When the AREVA system comes up for license renewal in 2023 with the U.S. Nuclear Regulatory Commission (NRC), SCE will implement AREVA's aging management program (AMP) and perform periodic inspections in accordance with the AMP. The equipment to conduct inspections exists today and has been used by AREVA at other nuclear sites, including at Rancho

Seco Nuclear Generating Station near Sacramento. At the same time, SCE and other utilities are working with the Electric Power Research Institute to advance inspection technologies.

There are also three different categories of monitoring that will be done for the new Holtec dry cask storage system: (1) routine maintenance required by the Holtec license, which will begin as soon as the first canister is loaded; this maintenance includes 24/7 security monitoring, periodic radiation surveys, continuous temperature monitoring, daily walk-downs and periodic inspections; (2) the Inspection and Maintenance Program required under Special Condition 7 in the ISFSI CDP (the CDP requires this to be completed by 2022, but SCE has agreed to complete it by October 2020 as part of the lawsuit settlement agreement); and (3) the AMP required by the NRC after the dry storage system is in use for 20 years.

#### Stress Corrosion Cracking is Rare

A phenomena known as chloride induced stress corrosion cracking (CISCC) can develop in stainless steel but is rare. No instances of CISCC in spent fuel canisters have been identified to date. The spent fuel canisters for SONGS are fabricated from 316L stainless steel, which has special properties to guard against corrosion. Even if conditions were present for stress corrosion, it would not necessarily mean that any cracks had begun forming. And if initiated, cracks are slow in developing, occurring over years. Unlike some components in an *operating* reactor, spent fuel canisters in a dry storage system have no high-pressure force to expand a crack.

#### Negligible Implications from Hypothesized Through-Wall Crack

In the unlikely event that a crack initiates and grows through the canister wall over time, there would be minimal to no impact to the site or public. The result of such an event would be a small release of inert helium, and any fission gases that did escape would diffuse into the air. Dry fuel canisters have no high-pressure forces to cause a release. Most importantly, in dry storage, there are several layers of containment between radiological material and the environment. The solid fission products would remain trapped in ceramic pellets and in sealed fuel rods stored in the sealed canister, which is encased in a cavity enclosure container.

#### Clarifying a 100-year Service Life for Canisters

Manufacturers of the two storage systems at SONGS – AREVA and Holtec – state that the Service Life for both the NUHOMS and UMAX used fuel canisters is 100 years. The two systems have a Design Life of 60 years. Service Life is typically longer than the Design Life because of the conservatism inherent in the codes, standards, and procedures used to design, fabricate, operate, and maintain the component. The warranty for the AREVA NUHOMS system is 10 years and the Holtec UMAX system carries a 30-year warranty. The typical initial License Life for a dry cask storage system licensed under 10 CFR Part 72 regulations is 20 years, with extensions in 20-40 year increments.

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The New SONGS ISFSI is Robust

The new SONGS ISFSI is designed to withstand an earthquake that is much larger than the earthquakes that could occur at San Onofre, with a robust design, and using a 1.5g acceleration – the highest of any ISFSI in the United States. Recent studies by the University of California, San Diego did not identify any earthquake faults that would challenge the existing design of the ISFSI at SONGS.

The new Holtec UMAX storage system at SONGS is essentially a concrete monolith. The Holtec system includes top and bottom pads that use a total of 900 tons (1.8 million pounds) of 1-3/8” thick rebar and special high-strength concrete rated at 5,000 PSI. Each of the 73 cavity enclosure containers weighs approximately 30,000 pounds and is capped with a 38,000 pound lid.

I look forward to attending the meeting on October 11 in Chula Vista and speaking about SCE’s ongoing efforts in support of offsite storage. Thank you for the opportunity to provide information and updates to the public on the Commission’s October 2015 approval of the CDP for the construction of a new ISFSI at SONGS.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Tom Palmisano', with a stylized flourish at the end.

Tom Palmisano

**From:** [Steve Carlson](#)  
**To:** [Street, Joseph@Coastal](mailto:Street, Joseph@Coastal)  
**Subject:** 11 October Meeting  
**Date:** Friday, October 06, 2017 8:28:46 AM  
**Attachments:** [House Oversight Testimony, Victor, 26 Sept. rev\[2\].pdf](#)

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Dr. Street,

I write to submit the attached testimony in connection with the CCC meeting on Oct. 11 in Chula Vista and the SONGS agenda item. SONGS Community Engagement Panel Chairman David Victor delivered this testimony before the House Oversight and Government Reform Subcommittee on Interior, Energy & Environment. The testimony addresses efforts to make offsite storage of spent nuclear fuel a reality and the related challenges, all of which I understand are of keen interest to the CCC.

Respectfully,

Steve Carlson  
Laboratory on International Law and Regulation  
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University of California, San Diego  
9500 Gilman Drive #0519  
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**Testimony of Prof. David G. Victor, Chairman of the San Onofre Community Engagement Panel, before the House Oversight and Government Reform Subcommittee on Interior, Energy and Environment**

Subcommittee Chairman Farenthold, Ranking Member Plaskett, and members of the subcommittee, including Representative Issa and Representative Gomez, thank you for the invitation to testify today about the national problem of storage and disposal of spent nuclear fuel. About 35 years ago Congress laid out a plan for long-term disposal of spent fuel from the country's nuclear reactors: the Nuclear Waste Policy Act (NWPA) of 1982. Since passage of that law, the government has consistently failed to meet key deadlines to remove spent fuel from the 99 operating commercial reactors at 59 sites around the country.<sup>1</sup> Worse, there are now 17 reactors at 14 sites in 11 states that are no longer operating—reactors, such as at San Onofre in Southern California where the spent fuel will remain stuck onsite long after the rest of the site has been shut down and removed.<sup>2</sup>

The Department of Energy has collected upwards of \$750 million annually from customers into a fund that amassed \$46 billion dollars by late 2016, the most recent audit.<sup>3</sup> These funds were intended to defray the cost of removal and long-term disposal of spent fuel. Instead, the funds sit essentially idle. A series of lawsuits has halted those payments for many utilities, and some utilities are now being paid damages from taxpayer funds to recover the cost of continued storage of their spent fuel beyond the time when it was supposed to be accepted by the government.

For many years, this persistent failure to perform was, outside the nuclear utility industry, largely unnoticed. Nearly all reactors that were built kept operating. Unable to ship spent fuel to a permanent repository they left it on site—in pools and in dry cask storage.

The situation today is completely different. While most of the US nuclear fleet continues to operate, a growing number of reactors are in the midst of decommissioning. For these sites, the inability to remove spent fuel is particularly deplorable. Local communities have seen most of the jobs associated with these reactors, along with many other benefits, disappear. They are watching massive deconstruction projects remove reactors domes, buildings and other facilities. Yet they are still left with the spent nuclear fuel onsite, without a proper home and without any indications as to when it will eventually be removed. Some solutions to this problem are coming into focus, but they require changes to federal law as well as new investments where Congress and the Administration must work together.

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<sup>1</sup> Kim Cawley, "Testimony: The Federal Government's Responsibilities and Liabilities Under the Nuclear Waste Policy Act," Before the Subcommittee on Environment and the Economy, Committee on Energy and Commerce, U.S. House of Representatives (3 December 2015).

<sup>2</sup> For detail see generally NUREG 1350. <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1350/>

<sup>3</sup> Office of the Inspector General, DOE, "Audit Report," OAI-FS-17-04 (December 2016).

I testify today as Chairman of the San Onofre Nuclear Generating Station (SONGS) Community Engagement Panel (CEP). SONGS Units 2 and 3 are the largest commercial reactors slated for decommissioning in the country, and the political environment around the plant is more intense than almost anywhere in the country. I serve in that role as a volunteer. I am also a Professor at the School of Global Policy and Strategy (GPS) at UC San Diego where I am also an adjunct professor in Climate, Atmospheric Sciences and Physical Oceanography at the Scripps Institution of Oceanography.

Back in 2013 when the operator of the plant, Southern California Edison (SCE) decided to decommission the facility it also set up this panel to open a two-way conduit between SCE (and its co-owners, San Diego Gas and Electric, the City of Anaheim and the City of Riverside) and the communities that would be affected by the decommissioning process. Over the last three years the CEP has provided exactly that function. It has offered ways for SCE to learn about the concerns of the communities—for example; the impact of shrinking the SONGS emergency planning systems, now that the plant poses a lower hazard to the community, on the budgets of first responders, hospitals and other essential public services. It also offers a way for SCE to help inform the communities about how decommissioning will unfold; the economic and environmental impacts, and the various strategies being adopted to mitigate adverse impacts. We meet quarterly and have 17 members (with one vacancy)—all volunteers, drawn from the local communities and a blend of public officials, representatives from environmental NGOs, business, labor, and other stakeholders. We are not a formal decision-making body nor do we have official oversight functions—there are plenty of other bodies with those powers and responsibilities.<sup>4</sup> I speak today as a private citizen who happens to be Chairman of the CEP, and I reflect on what we have learned over the three years of CEP operation.

Without a doubt, one topic has attracted the most attention at our CEP meetings and in the local communities: spent fuel. As in any community, there are many different views about a technology like nuclear power. With the closure of SONGS, I thought, that many of those diverging viewpoints would become moot and the communities could come together and focus on the best plan for decommissioning. Instead, many people have been shocked to learn that decommissioning of the plant does not mean removal of everything—the spent fuel remains because there is no place to send it. By not offering a practical place and method to ship spent fuel the Federal government has, through inaction, created a whole new array of acrimonious debates and controversy within local communities about how best to steward the spent fuel. I have observed and been in the middle of those debates for three years and the rest of my testimony outlines what I have seen and learned.

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<sup>4</sup> For more, including documents and video from every meeting, see [www.songscommunity.com](http://www.songscommunity.com)

## The importance of moving the fuel out of local communities at decommissioned sites.

First, I can't emphasize enough the importance of offering practical ways for decommissioned sites to move spent fuel out of their communities to other, more appropriate locations. Offering a practical route to that outcome would be enormously valuable to our communities. That route could involve finishing Yucca Mountain and allowing consolidated interim storage (CIS), also known as interim storage facilities (ISF), and I'll talk about that next. But people are most looking for is a viable plan that addresses an urgent problem—a problem that is not so pressing in communities with operating reactors but is vitally important to those where reactors are undergoing decommissioning and will have stranded spent nuclear fuel left with reduced security at the decommissioning site.

We are particularly concerned that the current arrangements at the Department of Energy (DOE) are opaque about which spent fuels will ship first. This problem has not been important to solve over the last few decades because there was no place to ship. Today that might be different and I would urge Congress to help DOE develop a more coherent set of priorities. The current "standard contract" for fuel shipments, while ambiguous, suggests that the oldest fuel will ship first. That approach will create an inefficient and incoherent shipment pattern—with canisters moved across a patchwork of sites, and no site happy with the outcome. We should put the decommissioned sites first because those sites are no longer generating spent fuel, in most cases are removing reactors and support buildings, and gain much smaller economic benefit from hosting these facilities. By contrast, sites with operating reactors will always have spent fuel in their reactor cores, fuel pools and dry cask pads. For all these communities, it is important to have a viable long-term plan for spent fuel removal; for decommissioned sites the imperative is particularly compelling.

## Political Realism

We in the San Onofre communities have learned that the politics of finding solutions to this problem are difficult. For years, Yucca Mountain has been a political lightning rod in ways that have made it exceptionally difficult—at times, impossible—to move forward with that site. The prospect of Consolidated Interim Storage might prove politically more tractable because, when combined with consent-based siting, it allows communities to nominate themselves to become storage sites. Following the guidance of the bipartisan Blue Ribbon Commission (BRC) report, we are encouraged that a process of informed consent has emerged and led to two communities volunteering themselves for CIS facilities. Today, my sense is that one of those sites is viable and that it enjoys healthy support from much of the local communities. The other site is owned by a company that paused its licensing process due to a planned acquisition which most likely will leave their CIS operations by the wayside. The viable site is in New Mexico where the governor of New Mexico has given approval for this CIS facility. The local entity that owns the land Eddy-Lea Energy Alliance (ELEA) wants the facility that is set to monitor at least 10,000 dry storage canisters in partnership with Holtec International. The ELEA is composed of cities of Carlsbad and Hobbs and the counties of Eddy and Lea. The community purchased the 1000 acres and has strong local support for the CIS facility. This is the model we must continue

to pursue of the government working with communities to find volunteers who want to help deal with the national crisis of stranded spent nuclear fuel around the country. Earlier this year we hosted officials from ELEA at a CEP meeting, and I was impressed by the level of planning and awareness.

In the densely populated communities around San Onofre, our interest is to advance any responsible program that moves the spent fuel out of our neighborhoods as quickly as possible. For us, that means Yucca and CIS simultaneously. Over the last three years, we have learned three important things about how to pursue this goal.

First, the nation does not benefit from monopolies. To some degree, the problems at Yucca Mountain are the result of the country having just one option. As that option has faltered the whole nation's industry, along with communities around nuclear power plants, have suffered. The original plan, way back when the NWPA was signed into law, was to have two sites. Expedience in public sector spending and noxious politics whittled that roster down to one, and that outcome has been harmful. I am very concerned that the same will happen with CIS. Overall, the nation and the communities that are hosting spent nuclear fuel would benefit from having many options.

Second, and equally important, it is crucial that CIS be viewed as a complement to Yucca Mountain (and to other means of permanent spent fuel disposal—for example, deep borehole technology). I appreciate that over the last year that much of the newfound enthusiasm for acting on spent fuel is rooted in a desire to restart Yucca Mountain. But any realistic scenario for Yucca must deal with the reality that Yucca is still a long time coming. The site is not operational. Once operational, fuel will need repackaging so that casks with large numbers of fuel assemblies are put into smaller units with fewer assemblies and lower heat loads. All that will take time.

For the communities around San Onofre, those realistic delays in starting Yucca create the imperative for CIS. We want the spent fuel moved. For the nation as a whole, those delays offer an important logic for CIS: safety and saving money. It is much wiser to store spent fuel at a small number of large sites, far from population centers, than dozens of sites scattered around the country. Scientists at Oak Ridge National Laboratory have estimated the cost savings from a robust CIS program and found that we could avoid \$15-30b in expenditure in light of expected delays in reopening Yucca Mountain.<sup>5</sup> Fiscal prudence demands that CIS be part of the overall strategy.

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<sup>5</sup> For an overview see J. Jarrell "Does Consolidated Interim Storage Make Sense in an Integrated Waste Management System?" Oak Ridge National Laboratory, NEI Used Fuel Management Conference, May 2017, Savannah, GA. Numbers here are undiscounted. For discounting and sensitivity analysis see: Cost Sensitivity Analysis for Consolidated Interim Storage of Spent Fuel: Evaluating the Effect of Economic Environment Parameters (Cumberland et al., FCRD-NFST-2016-000721, Rev. 1 ORNL/SR-2016/681) Available at <https://curie.ornl.gov/content/cost-sensitivity-analysis-consolidated-interim-storage-spent-fuel-evaluating-effect-economic>

Third, the political coalitions around nuclear power are in flux when it comes to spent fuel. There is a well-known debate about the role of nuclear power in the nation's future energy mix, and active industry efforts to improve performance to keep as many of the existing fleet operational. There are also well-known battle lines drawn for and against nuclear power. What has impressed me about spent fuel is that those battle lines have shifted. Many groups that have been skeptical or outright against operational nuclear plants—such as the Natural Resources Defense Council and the Union of Concerned Scientists—are aligned in favor of finding smart strategies for storing spent fuel, including CIS. It is really important that the larger, heated and probably irreconcilable differences about operational reactors not cloud the fact that many more communities are coming together to find solutions to storing spent fuel.

For Congress, these three lessons suggest that the current efforts—far advanced in the House and still developing in the Senate—to amend the NWPA are profoundly important. As those efforts proceed it is important that the Yucca mission, which has attracted more attention and political energy, not leave CIS aside.

#### Toward a Long-term Strategy: the Roles of Stewardship and Transportation

Compared with three years ago, there has been striking progress, especially in the House, toward new legislation that would address many of the obstacles to restarting Yucca and also authorizing a new program of consolidated storage. While that is admirable, we also need to grapple with the consequences of a long delay in arriving at this point. It is also crucial to grapple with the fact that most people outside Washington are skeptical that Washington can organize and motivate itself to make practical changes in law and back those with reasonable appropriations. What I have seen in the local communities around San Onofre is concern that Washington is so broken that reasonable bipartisan legislation, such as smart amendments to the NWPA, can't survive the legislative process.

This skepticism has three practical implications. First, while there are some actions that DOE or NRC can do to advance consolidated storage and promote smart stewardship of the nation's spent nuclear fuel, the most important actions require a change in federal law. Getting House (HR 3053) and Senate versions into conference is essential, lest Congress itself be seen as a central obstacle to progress in what has been, so far, largely an Executive Branch failure to deliver on promises made to the American people—especially the people living within the foot prints of nuclear reactors. I have testified at the NRC about their efforts to streamline the regulatory process, which are admirable.<sup>6</sup> But the reality is that the NRC is already doing what it can; even without streamlining of the regulatory process for decommissioned sites those sites

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<sup>6</sup> 2014. David G. Victor. Decommissioning at San Onofre: The Community Engagement Experience. Testimony to the Nuclear Regulatory Committee. For more information see <https://www.nrc.gov/reading-rm/doc-collections/commission/slides/2014/20140715/victor-20140715.pdf>

are finding ways to cope with NRC procedures through exemptions. What everyone is waiting for is enabling federal law.

Second, because of these delays—and skepticism about when they will be resolved—the nation’s nuclear sites are now gearing up to monitor and manage spent nuclear fuel casks in ways that were never intended. The original plan was that spent fuel would be removed from reactor cores, cooled in pools onsite, and then put into canisters and casks for brief local storage and expeditious removal. Because that last step in the chain has never happened, the canisters and cask systems are now aging in place. At the urging of the CEP, SCE has developed an extensive program for monitoring the casks and inspecting the canisters while they are on site.<sup>7</sup> Recent legal challenges and settlements have reinforced that effort.<sup>8</sup> We are fortunate in that other sites built dry cask systems before SONGS and we can learn from their aging management programs. To give you a sense of just how long the delays have extended, as of today several sites have seen the original 20 year NRC license for on-site dry cask storage run its course, with each getting a 40-year renewal. At the most recent CEP meeting we devoted the entire session to this topic.<sup>9</sup>

Third is transportation. There is an understandable tendency in Washington to do what can be done. This tendency has generated legislation that focuses on Yucca Mountain and brings CIS along. But we must focus, now, on the reality that all of these strategies will not work unless there are viable ways to move spent fuel from reactor sites to CIS and/or permanent repositories. The US Navy safely ships defense spent nuclear fuel and related materials around the country on a regular basis—thousands of shipments—using an effective and credible government planning system and emergency training for its routes. This system must be available to the DOE as it takes authority over spent nuclear fuel transportation. The NRC has procedures ready for use in this area (NUREG 0725). Safe transportation of spent commercial reactor fuel is not a technical problem, but it is one that needs careful administrative planning and political awareness.

A serious transportation plan would have several elements:

- A program for testing and building railroad cars for moving spent fuel casks. This is a DOE responsibility, and with current appropriations DOE will test a prototype rail car (along with other support cars) over the next 2 years. That’s good news, but there are

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<sup>7</sup> 2014. David G. Victor. Safety of long-term storage of spent nuclear fuels at SONGS. Report of the Chairman of the Community Engagement Panel of the SONGS. For more information see [https://www.songscommunity.com/docs/LongTermStorageofSpentFuel\\_120914.pdf](https://www.songscommunity.com/docs/LongTermStorageofSpentFuel_120914.pdf)

<sup>8</sup> 2017. Citizens Oversight, Inc. V. Southern California Edison. For more information see [https://www.songscommunity.com/doc\\_library\\_settlement.asp](https://www.songscommunity.com/doc_library_settlement.asp)

<sup>9</sup> 2017. 3Q Meeting of the Community Engagement Panel. Oceanside, California. For more information see <http://www.songscommunity.com/091417CEPMeetingAgenda.pdf>

no appropriations to build a fleet of these cars as will be needed to move spent fuel expeditiously. Elsewhere I have outlined the state of play and costs, which are small.<sup>10</sup>

- The states and regions must get ready. When DOE was planning to move waste from the nuclear weapons sites—such as in Colorado and Washington—state and regional officials got organized to help plan routes, safety and procedures. The states where these sites were shipping nuclear materials had an incentive to make this work because they wanted the sites cleaned up. By contrast, very little to none of the necessary spadework for local, state and regional planning of spent fuel shipments has been done. There is legislation in California that would help.<sup>11</sup> The CEP has reached out to the California Energy Commission on this topic.<sup>12</sup> And the Western Governors Association could easily be tapped—as could regional state associations in other parts of the country. The problem is that nobody has believed that serious solutions for spent nuclear fuel would be forthcoming. Now that they are, the transportation planning processes must gear up—with a key role for the Federal government.

All the authority needed to fix this problem does not rest with Congress but many are looking to Congress for leadership and initiative in getting the process started. A good start would be to ensure that a title on transportation is included in NWPA Amendments (inserted, presumably, in Conference), appropriations to build the needed railcar system are included in a timely way (probably starting next fiscal year), and the states are encouraged if not mandated to get organized. Under plausible yet optimistic scenarios, CIS facilities could be open in the early 2020s. Spent fuel at SONGS (and many other sites) would be ready for shipment then. It would be a pity if all the work done to open storage and permanent disposal facilities falters for lack of attention to transportation.

### Final Words

In a large and diverse nation such as ours, there always seems to be a more pressing and urgent matter that captures political attention. Meanwhile, critical questions about the nuclear industry and its infrastructure remain unanswered for decades while leaving un-spent billions of dollars. Inaction has pushing these questions to future generations to answer.

These delays only succeed in creating distrust in the ability of government to find a workable solution, anger towards the plant operators and creates an impossible future for those communities that involuntarily host these sites. All we ask is that those who can act and make a difference, do so with all possible urgency.

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<sup>10</sup> David Victor, Tim Brown and Dan Stetson, “Participants in 12 June telephone call with DOE to discuss transportation of spent nuclear fuel,” 26 June 2017, see [www.songscommunity.com](http://www.songscommunity.com)

<sup>11</sup> 2017. Nuclear Waste Policy Amendments Act of 2017. For more information see <https://www.congress.gov/bill/115th-congress/house-bill/3053>

<sup>12</sup> Letter from David Victor, Tim Brown and Dan Stetson to Robert Weisenmiller, Chairman of the California Energy Commission, 12 December 2016. see [www.songscommunity.com](http://www.songscommunity.com)

A plan for smart removal of spent nuclear fuel from the nation's commercial reactors is now coming into focus. It will require new legislation and a new focus by the federal government, as well as the states and regional planning authorities.

I see three steps as essential. First, the political deal must be done that allows for consolidated interim storage, and that deal as far as I can tell centrally requires restarting the Yucca Mountain process. Yucca and CIS should be seen as complements to each other. Politically they are combined; economically and technically they are also combined because interim storage allows for a more rational long-term strategy that includes opening a permanent storage facility. Second, a fresh look at the priorities for removing spent fuel is needed. When options for sending the fuel become viable there will be much more fuel ready to move than the system can handle. We think decommissioned sites should be high in the queue. Third, a viable strategy for transportation is needed—a topic that has been orphaned by the lack of suitable places to send the fuel. Transportation requires some funds (small, mainly for rail cars and planning) and crucially that federal, state and other officials begin working together on strategies.

**RODNEY MCCULLUM**

*Senior Director,  
Fuel and Decommissioning*

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October 5, 2017

Dr. Joseph Street  
California Coastal Commission  
45 Fremont, Suite 2000  
San Francisco, CA 94105

**Subject:** Nuclear Power Industry Support for California Coastal Commission Approval of a Coastal Development Permit that Facilitated the Construction of an Independent Spent Fuel Storage Installation (ISFSI) at San Onofre Nuclear Generating Station (SONGS)

Dear Dr. Street:

In advance of the California Coastal Commission's October 11 informational briefing on the storage of used nuclear fuel at San Onofre Nuclear Generating Station (SONGS), the Nuclear Energy Institute (NEI)<sup>1</sup> and the industry would like to voice our strong support for the Commission's October 2015 unanimous approval of a coastal development permit (CDP) that cleared the path for construction of a new independent spent fuel storage installation (ISFSI) at SONGS. This expanded facility will play an important role in the continued safe storage of used fuel at SONGS.

The nuclear industry has more than 30 years of experience safely loading and monitoring dry storage systems such as those being installed at SONGS. To date 2500 of these systems have been placed into service at 71 locations across the country without incident. These robust systems have a proven record of protecting public health and safety. They have withstood earthquakes, hurricanes, and other severe natural events without any harmful release of radiation.

Like most of the dry storage systems in use today, the storage canisters at the heart of the SONGS ISFSIs are also designed and licensed to be transportable. Thus, in approving the CDP, the Commission has taken an important step toward providing for the eventual removal of used fuel from the SONGS site.

NEI stands in solidarity with the people of Southern California in our desire to see used fuel removed from shutdown plant sites such as SONGS. It is important to our industry that the federal government satisfies its long overdue obligation to move used fuel away from plant sites so that we can completely reclaim these

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Dr. Joseph Street  
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sites once they are no longer generating electricity. Accordingly, we are actively working to advance both interim consolidated storage options, such as facilities recently proposed in Texas and New Mexico, and permanent disposal at Yucca Mountain in Nevada. I have attached a related letter we recently sent to key leaders in the U.S. House of Representatives in support of a legislative proposal that represents an important step towards revitalizing the federal used fuel management program.

The Commission is to be applauded for taking action to provide for this necessary temporary solution to the management of used fuel while it remains at SONGS. I look forward to your continued leadership in this regard. Our industry remains fully committed to continuing to assure ISFSI safety until fuel leaves the SONGS site.

Sincerely,

A handwritten signature in black ink, appearing to read "Rodney McCullum", written in a cursive style.

Rodney McCullum

Attachment

**MARIA KORSNICK**

*President and Chief Executive Officer*

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nei.org



September 26, 2017

The Honorable Greg Walden  
Chairman, Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Frank Pallone  
Ranking Member, Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Fred Upton  
Chairman, Subcommittee on Energy  
Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Bobby Rush  
Ranking Member, Subcommittee on Energy  
Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Chairman Walden, Ranking Member Pallone, Subcommittee Chairman Upton, and  
Subcommittee Ranking Member Rush:

On behalf of the Nuclear Energy Institute, I am writing in support of H.R. 3053, the Nuclear Waste Policy Amendments Act of 2017. This is an important step to revitalize the federal used nuclear fuel program by helping to move the Yucca Mountain project forward while also providing the U.S. Department of Energy with clarifying authority to fund and develop consolidated interim storage facilities. This bill has garnered bipartisan support as demonstrated by the House Energy and Commerce Committee's 49-4 vote in favor of passage. NEI commends your leadership to achieve comprehensive solutions for used nuclear fuel management.

Committee on Energy and Commerce  
U.S. House of Representatives  
September 26, 2017  
Page 2

It is time for the federal government to meet its statutory and contractual obligations. Utilities and their electricity customers have done their part. They have paid more than \$40 billion into the Nuclear Waste Fund. In addition, taxpayers have been saddled with the federal government's inaction, with more than \$6 billion in damages having already been paid from the Judgment Fund and billions more in liability continuing to mount absent real progress to reform the program.

The lack of a strong used fuel management program also has affected public support of nuclear power for far too long. This is unfortunate as the overwhelming scientific evidence demonstrates that used nuclear fuel can be and has been managed safely.

Passage of the Nuclear Waste Policy Amendments Act of 2017 would help place the federal government on a path to fulfill its responsibilities and to unburden taxpayers of the ever-mounting liability by establishing a durable program for managing used nuclear fuel.

The nuclear industry applauds the dedicated bipartisan work that took place to tackle this complex problem and pass the bill out of committee. We hope to see the legislation swiftly pass the House.

Sincerely yours,

A handwritten signature in cursive script that reads "Maria Korsnick". The signature is written in black ink and is positioned above the printed name.

Maria Korsnick



ORANGE COUNTY  
**COASTKEEPER**

3151 Airway Avenue, Suite F-110  
Costa Mesa, CA 92626  
Phone 714-850-1965  
Fax 714-850-1592  
www.Coastkeeper.org

RECEIVED  
OCT 05 2017  
CALIFORNIA  
COASTAL COMMISSION

October 3, 2017

Dr. Joseph Street  
California Coastal Commission  
45 Fremont, Suite 2000  
San Francisco, CA 94105

Dear Dr. Street and Members of the Commission:

As Founder and President of Orange County Coastkeeper, I have consistently supported all reasonable efforts to move the San Onofre nuclear plant's used nuclear fuel to an off-site location. It simply makes no sense to keep this waste at the current site, which is adjacent to coastal waters, busy railroads and a freeway that accommodates 140,000 vehicles a day.

I strongly support the California Coastal Commission's 2015 decision to approve a coastal development permit for a dry cask storage facility for San Onofre's used fuel. Since the used fuel must be placed in these sealed storage canisters before it can be moved off site, moving the fuel into dry storage gets it one step closer to being ready to transport away from San Onofre. In addition, I am convinced that storing spent fuel in dry cask storage is safer than storage in cooling pools. I oppose the suggestion to store spent fuel in cooling pools until such time that it can be relocated to an off-site facility. It is too many years off and potentially more dangerous.

Orange County Coastkeeper is dedicated to protecting and preserving marine habitats and watersheds through education, advocacy, restoration, and enforcement. Relocating the fuel to an interim or permanent national repository is a high priority for many Southern California communities, and Orange County Coastkeeper shares this priority.

I welcome and appreciate the Commission's decision to host a public briefing Oct. 11 on the San Onofre used fuel storage permit. I write today to affirm my strong support for the Commission's 2015 decision, and its finding that the San Onofre dry storage project would be consistent with the hazards, marine resources, and water quality policies of the California Coastal Act.

My support is based on my long-standing commitment to the environment, and the extensive public and private commentary I have heard on this topic as a member of the San Onofre Community Engagement Panel, and as an activist that is committed to protecting our most precious resource, the California coast and near-shore waters.

Thank you for your consideration.

All the best,

Garry Brown

Founder/President

**From:** [Donna Gilmore](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** SoCal Edison admits no seismic rating for cracked canisters  
**Date:** Friday, September 29, 2017 7:33:53 AM

---

Don't the Coastal permits for San Onofre dry nuclear waste storage systems require adequate seismic ratings and requirebtgese seismic ratings to be maintained? Tom Palmisano admits at the recent Community Engagement Panel meeting there is no seismic rating for partially cracked canisters. See video below. Was this information shared with the Coastal Commission when the existing Areva NUHOMS permit was granted and the new Holtec system permit was granted?

<https://youtu.be/33FwTTMZLNI>

At this meeting it was reaffirmed they still have no way to find cracks, yet know these canisters are susceptible to cracks.

A **two**-year old Diablo Canyon canister has all the conditions for cracking due to the coastal environment similar to San Onofre. At one time the Nuclear Regulatory Commission thought it would be 30 years before a crack could occur due to the high temperature of the canister that would not allow moisture to dissolve corrosive marine salts. However, they found evidence this was not the case.

Is this grounds to suspend or revoke the permits until this issue is resolved? Edison announced plans to load the Holtec canisters in November, so there is still time to stop that loading. The NRC has not yet granted the Independent Spent Fuel Storage ISFSI license for the Holtec system. It also is not being designed according to NRC approved Holtec technical specifications.

Please advise,

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

# CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
PHONE: (831) 427-4863  
FAX: (831) 427-4877  
WEB: WWW.COASTAL.CA.GOV



# W9a

## SAN ONOFRE NUCLEAR GENERATING STATION

### SPENT FUEL STORAGE BRIEFING

OCTOBER 11, 2017

### CORRESPONDENCE

(THROUGH SEPTEMBER 26, 2017)

DARRELL E. ISSA  
49TH DISTRICT, CALIFORNIA

www.issa.house.gov

COMMITTEE ON THE JUDICIARY

COMMITTEE ON FOREIGN AFFAIRS

COMMITTEE ON OVERSIGHT  
AND GOVERNMENT REFORM



Congress of the United States  
House of Representatives  
Washington, DC 20515-0549

WASHINGTON OFFICE:  
2269 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-3906

VISTA OFFICE:  
1800 THIBODO ROAD, SUITE 310  
VISTA, CA 92081  
(760) 599-5000  
FAX: (760) 599-1178

DANA POINT OFFICE:  
33282 GOLDEN LANTERN, SUITE 102  
DANA POINT, CA 92629  
(949) 281-2449

June 9, 2017

California Coastal Commission  
Headquarters  
45 Fremont Street, Suite 2000  
San Francisco, California 94105

Dear Commissioners:

Reports suggest the California Coastal Commission (“CCC” or “Commission”) intends to hold a meeting in August 2017 regarding Independent Spent Fuel Storage Installations (ISFSI) and to review nuclear permitting authorities at the state and federal levels. Maintaining an open, continued dialogue with stakeholders on the need for swift action on nuclear storage is extremely important to the safety of the public, security, environment, and energy needs of our beautiful State.

I, however, write to express concerns about the chosen location for this meeting and request it to be moved. Pepperdine University in Malibu, California is still nearly 100 miles away from the San Onofre Nuclear Generating Station (SONGS), which has received the most recent ISFSI permit in California. I respectfully request for this meeting be moved to the CCC’s “South District” of Orange County so the Commission may hear from the community most invested and most directly influenced by the discussion.

My Congressional district is home to SONGS. The Station’s position near the populous Orange and San Diego Counties makes the storage of approximately 3.6 million pounds of high-level nuclear waste at SONGS of personal concern to this region. In fact, more than 8 million people live within a 50-mile radius of the station.

This waste is to remain on site until the Department of Energy fulfills its obligation to safely remove the waste and store it in a secure repository. The participation of local citizens regarding the future of spent nuclear fuel at SONGS is a crucial component to public confidence in the processes for decommissioning and safe storage.

Our local community can offer valuable insight into this issue. For instance, the SONGS Community Engagement Panel, a grassroots coalition consisting of diverse stakeholders, meets regularly to discuss and review updates on the plant’s decommissioning progress and storage

options for the spent nuclear fuel with SONGS owners. This group includes local residents, elected officials, businesses, community leaders, and representatives of the military and utility company alike. In addition to this group, the nearby communities at-large are informed and engaged on the issues surrounding SONGS. Public engagement and an open forum with the well-informed citizens near SONGS will provide the CCC greater perspective and long-term solutions to satisfy the mission to protect California and its citizens.

If the location for this meeting is not moved closer to the communities affected, many of my constituents will be forced to drive hours in order to voice their concerns or questions or will be unable to attend. I strongly urge this meeting to be relocated so that all in my community may have the chance to be heard.

Thank you for your attention to this important matter and for considering this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Darrell Issa".

Darrell Issa  
Member of Congress

cc: Commissioner Donne Brownsey  
Commissioner Mary K. Shallengberger  
Commissioner Mark Vargas  
Commissioner Ryan Sundberg, North Coast Representative  
Commissioner Aaron Peskin, North Central Coast Representative  
Commissioner Carole Groom, Central Coast Representative  
Commissioner Erik Howell, South Central Coast Representative  
Commissioner Roberto Uranga, South Coast Representative  
Commissioner Stephen Padilla, San Diego Coast Representative



## Office of Mayor and City Councilmembers

Phone: (949) 361-8322 Fax: (949) 361-8283

Website: <http://san-clemente.org>

E-mail: [CityCouncil@san-clemente.org](mailto:CityCouncil@san-clemente.org)

Kathy Ward, *Mayor*  
Tim Brown, *Mayor Pro Tem*  
Chris Hamm, *Councilmember*  
Lori Donchak, *Councilmember*  
Steve Swartz, *Councilmember*

James Makshanoff, *City Manager*

May 3, 2017

RECEIVED

MAY 08 2017

CALIFORNIA  
COASTAL COMMISSION  
SAN DIEGO COAST DISTRICT

California Coastal Commission  
Chair Dayna Bochco  
45 Fremont Street  
San Francisco, CA 94105

Dear Chair Bochco:

The City of San Clemente respectfully requests the California Coastal Commission (CCC) to revisit its decision to issue a spent nuclear fuel storage permit to Southern California Edison (SCE) at San Onofre Nuclear Generating Station (SONGS). Our request is driven by deep concern in our community to ensure the safety of our residents.

We hereby request that you revise and strengthen the conditions imposed upon the Independent Spent Fuel Storage Installation (ISFSI) permit and consider the following concerns and requests:

- 1) Due to the absence of significant progress by the Federal Government in approving temporary and permanent Federal fuel storage alternatives for the waste at SONGS, San Clemente will be forced to be an involuntary "host" community for decades to come.

The City of San Clemente strongly embraces the 2012 Presidential Blue Ribbon Commission on America's Nuclear Future which recommends "consent-based siting" of nuclear waste. San Clemente shares the coastline (and a zip code) with SONGS and we wish to make it abundantly clear that the City and its residents strongly oppose indefinite storage of high-level nuclear waste at our border. The City does *not* agree to be an involuntary host for nuclear waste for decades or possibly forever.

- 2) Require that SCE expedite the development of the "Aging Management Plan" to address key questions regarding fuel monitoring and cask repair. We also ask that a comprehensive and transparent air, soil and water monitoring program be developed that is accessible to the public. This should be completed prior to the demolition of the spent fuel pool.
- 3) Due to its proximity to the ocean, key transportation corridors and dense population centers, San Clemente believes that ongoing fuel storage at SONGS is the worst possible scenario for the future. Although the move from wet to dry storage represents an improvement in the status quo storage choices, we remain passionately committed to the expedited removal of the waste away from our shoreline and community and ask the CCC continue to press SCE and the Federal government, when possible, to find alternate locations for the fuel as soon as possible.

California Coastal Commission - Chair Dayna Bochco  
May 3, 2017  
Page Two

- 4) San Clemente continues to support Federal efforts to permit and open potential Consolidated Interim Storage sites in New Mexico and Texas as well as efforts to reopen the permanent storage facility located at Yucca Mountain. We request that the CCC make it a priority to use its authority and influence to assist at every level in the goal of moving nuclear waste to safe and remote regions until permanent solutions are found.
- 5) Finally, we request that the CCC require SCE to continue funding all necessary emergency services throughout the entire decommissioning and storage process. PG&E has made such a commitment to the communities surrounding Diablo Canyon and we expect the same commitment to public safety in this region.

If the above conditions cannot be met, San Clemente demands that you revoke the permit.

We remain grateful for the good work that the CCC has done to protect our shorelines and communities, and ask that you act to help us keep our communities safe for years to come.

Sincerely,



Kathy Ward, Mayor

cc: ✓ California Coastal Commission  
John Ainsworth, California Coastal Commission Executive Director  
U.S. Senators Diane Feinstein and Kamala Harris  
U.S. Representative Darrell Issa  
California Senator Pat Bates  
California Assemblyman Bill Brough  
Mayors: Oceanside, Laguna Beach, San Juan Capistrano, Dana Point  
Commanding General, US Marine Corps, Camp Pendleton  
Department of Energy  
Concerned Coastal Communities Coalition  
San Diego Superior Court  
Media

Enclosures:

City of San Clemente – Resolution on Permanent Repository, dated 12/17/13  
City of San Clemente – Resolution on Permanent Repository and Priority Transfer, dated 11/6/14  
City of San Clemente – Resolution on Interim Consolidated Storage Act HR 3643, dated 2/2/16

RESOLUTION NO. 13-53

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
SAN CLEMENTE, CALIFORNIA, DECLARING THE CITY'S  
POSITION ON VARIOUS ISSUES RELATING TO THE  
PENDING CLOSURE OF THE SAN ONOFRE NUCLEAR  
GENERATING STATION (SONGS)  
REFERENCE: DOCKET ID NO. NRC-2012-0246

WHEREAS, San Clemente is home to 65,000 residents and is located entirely within the 10-mile Emergency Planning Zone for the San Onofre Nuclear Generating Station; and

WHEREAS, in June 2013, following more than a year of investigation and analysis by both Southern California Edison (SCE) and the Nuclear Regulatory Commission (NRC), SCE determined that San Onofre should be permanently decommissioned; and

WHEREAS, in response to Southern California Edison's decision to decommission SONGS, the City of San Clemente urges SCE and the NRC to ensure that public safety remains paramount during the decommissioning process and beyond; and

WHEREAS, Congress assigned to the Energy Department the task of creating an underground repository for nuclear waste as a result of the Nuclear Waste Policy Act of 1982, however, that task has yet to be completed; and

WHEREAS, the storage of spent fuel rods onsite at SONGS continues to be a concern to the residents of San Clemente; and

WHEREAS, the Nuclear Regulatory Commission (NRC) controls the decommissioning of nuclear facilities to ensure that safety requirements are being met, and

WHEREAS, the City Council of the City of San Clemente takes its responsibility to represent its citizens with utmost seriousness and, as such, desires to be included in the decommissioning process for SONGS.

NOW, THEREFORE, the City Council of the City of San Clemente does hereby resolve as follows:

Section 1. The City of San Clemente formally requests the creation of a repository to provide safe storage of nuclear waste.

Section 2. Once complete the City of San Clemente requests that the spent fuel rods stored onsite at SONGS be prioritized for relocation to the repository as soon as it is safe to do so, in light of a) the geographic conditions unique to SONGS, b) the dense population surrounding SONGS, and c) the fact that SONGS is being decommissioned.

Section 3. The City Clerk is hereby directed to forward certified copies of this resolution to the Nuclear Regulatory Commission, the Department of Energy and Southern California Edison.

Section 4. The City Clerk shall certify to the passage and adoption of this resolution and enter it into the book of original resolutions.

PASSED AND ADOPTED this 17th day of December, 2013.

ATTEST:

*Joanne Baade*  
\_\_\_\_\_  
City Clerk of the City of  
San Clemente, California

*Jeff Brown*  
\_\_\_\_\_  
Mayor of the City of San  
Clemente, California

STATE OF CALIFORNIA )  
COUNTY OF ORANGE ) §  
CITY OF SAN CLEMENTE )

I, JOANNE BAADE, City Clerk of the City of San Clemente, California, do hereby certify that Resolution No. 13-53 was adopted at a regular meeting of the City Council of the City of San Clemente held on the 17th day of December, 2013, by the following vote:

AYES: BAKER, DONCHAK, EVERT, HAMM, MAYOR BROWN

NOES: NONE

ABSENT: NONE

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this 19th day of December, 2013.

*Joanne Baade*  
\_\_\_\_\_  
CITY CLERK of the City of  
San Clemente, California

Approved as to form:

/s/ Jeff Goldfarb  
City Attorney

I, JOANNE M. BAADE, CITY CLERK OF THE CITY OF SAN CLEMENTE, STATE OF CALIFORNIA, HEREBY CERTIFY UNDER PENALTY OF PERJURY THE FOREGOING INSTRUMENT TO BE A FULL, TRUE AND CORRECT COPY OF THE ORIGINAL NOW ON FILE IN MY OFFICE.

DATE: 5-4-17  
*Joanne Baade*  
\_\_\_\_\_  
JOANNE M. BAADE  
CITY CLERK  
BY: \_\_\_\_\_

RESOLUTION NO. 14-49

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
SAN CLEMENTE, CALIFORNIA, DECLARING THE CITY'S  
POSITION ON STORAGE OF SPENT NUCLEAR FUEL AT  
THE SAN ONOFRE NUCLEAR GENERATING STATION  
(SONGS) WHILE UNDERGOING DECOMMISSIONING

WHEREAS, San Clemente is home to 65,000 residents and is located within the 10-mile Emergency Planning Zone for the San Onofre Nuclear Generating Station; and

WHEREAS, in June 2013, SONGS submitted notice of its decision to permanently decommission the nuclear plant; and

WHEREAS, the Nuclear Regulatory Commission (NRC) is the regulatory agency for decommissioning of nuclear facilities; and

WHEREAS, Congress assigned to the Energy Department the task of creating an underground repository for nuclear waste as a result of the Nuclear Waste Policy Act of 1982, which has yet to be completed; and

WHEREAS, the City of San Clemente requests that SCE and the NRC ensure that public safety remains paramount during the dry cask storage process of spent nuclear fuel; and

WHEREAS, on August 26, 2014, the NRC voted to allow spent nuclear fuel to be stored at onsite, licensed Independent Spent Fuel Storage Installation (ISFSI) pads according to three timelines: 60 years, 100 years, and indefinitely, without consulting the City of San Clemente; and

WHEREAS, on December 17, 2013 the San Clemente City Council adopted RESOLUTION NO. 13-53 which states:

*"NOW, THEREFORE, the City Council of the City of San Clemente does hereby resolve as follows:*

*Section 1. The City of San Clemente formally requests the creation of a repository to provide safe storage of nuclear waste.*

*Section 2. Once complete the City of San Clemente requests that the spent fuel rods stored onsite at SONGS be prioritized for relocation to the repository as soon as it is safe to do so, in light of a) the geographic conditions unique to SONGS, b) the dense population surrounding SONGS, and c) the fact that SONGS is being decommissioned."*

WHEREAS, on May 14, 2014, Senate Bill S2326 was submitted to the Committee on Environment and Public Works to amend the Atomic Energy Act of 1954 to provide for consultation with State and local governments, the consideration of State and local concerns, and the approval of post-shutdown decommissioning activities reports by the Nuclear Regulatory Commission.

NOW, THEREFORE, the City Council of the City of San Clemente does hereby resolve as follows:

Section 1. The City of San Clemente reiterates its request that the DOE move forward with the creation of a permanent spent nuclear fuel repository as tasked by the Nuclear Waste Policy Act of 1982.

Section 2. The City of San Clemente formally requests that the DOE and the NRC renew efforts to find a real and lasting solution to our nation's nuclear waste problem.

Section 3. The City of San Clemente supports re-establishment of Yucca Mountain as a permanent spent fuel repository.

Section 4. The City of San Clemente supports Senate Bill S2326.

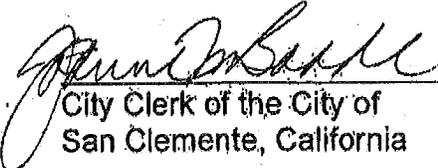
Section 5. The City of San Clemente supports the State of California's 1976 Moratorium on New Nuclear Power Plant Development.

Section 6. The City Clerk is hereby directed to forward certified copies of this resolution to the Nuclear Regulatory Commission, California Public Utilities Commission, Southern California Edison, Governor Jerry Brown, Senator Barbara Boxer, Senator Dianne Feinstein, Congressman Darrell Issa, and San Clemente's surrounding cities.

Section 7. The City Clerk shall certify to the passage and adoption of this resolution and enter it into the book of original resolutions.

PASSED AND ADOPTED this 6<sup>th</sup> day of November, 2014.

ATTEST:

  
\_\_\_\_\_  
City Clerk of the City of  
San Clemente, California

  
\_\_\_\_\_  
Mayor of the City of San  
Clemente, California

STATE OF CALIFORNIA )  
COUNTY OF ORANGE ) S  
CITY OF SAN CLEMENTE )

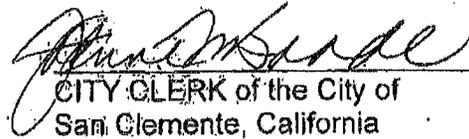
I, JOANNE BAADE, City Clerk of the City of San Clemente, California, do hereby certify that Resolution No. 14-49 was adopted at a regular meeting of the City Council of the City of San Clemente held on the 6<sup>th</sup> day of November, 2014, by the following vote:

AYES: BAKER, DONOHAK, HAMM, MAYOR BROWN

NOES: NONE

ABSENT: EVERT

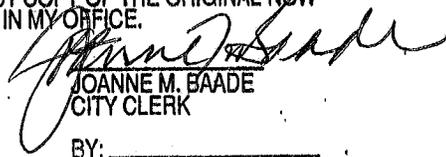
IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this 15<sup>th</sup> day of NOV, 2014.

  
CITY CLERK of the City of  
San Clemente, California

Approved as to form:

/s/ Jeff Oderman  
City Attorney

I, JOANNE M. BAADE, CITY CLERK OF THE CITY OF SAN CLEMENTE, STATE OF CALIFORNIA, HEREBY CERTIFY UNDER PENALTY OF PERJURY THE FOREGOING INSTRUMENT TO BE A FULL, TRUE AND CORRECT COPY OF THE ORIGINAL NOW ON FILE IN MY OFFICE.

DATE: 5/14/17   
JOANNE M. BAADE  
CITY CLERK  
BY: \_\_\_\_\_

RESOLUTION NO. 16-04

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
SAN CLEMENTE, CALIFORNIA, IN SUPPORT OF H.R. 3643,  
THE INTERIM CONSOLIDATED STORAGE ACT OF 2015

WHEREAS, millions of ratepayers and taxpayers dollars are being spent on the monitoring and oversight of Spent Nuclear Fuel (SNF) each year and millions more are programed to be spent on settlement payments related to waste disposition; and

WHEREAS, much of the SNF and High Level Radioactive Waste (HLW) is currently stored at sites that are vulnerable to natural disasters and located near large metropolitan centers; and

WHEREAS, the United States Department of Energy concluded in 2013 that a geologic repository for the permanent disposal of SNF and HLW will not be available until 2048, at the earliest; and

WHEREAS, the President's Blue Ribbon Commission on America's Nuclear Future recommended that efforts be made to advance consolidated SNF and HLW interim storage facilities while further efforts are made to develop a permanent disposal site; and

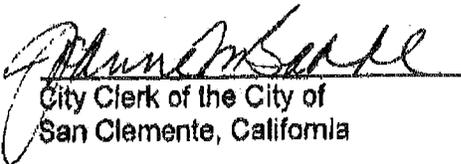
WHEREAS, the SNF at the San Onofre Nuclear Generating Station (SONGS), a decommissioning site, should be promptly and safely moved to a Consolidated Storage site, which is one of the recommendations of the President's Blue Ribbon Commission on America's Nuclear Future and is proposed by H.R. 3643, the Interim Consolidated Storage Act of 2015.

NOW, THEREFORE, the City Council of the City of San Clemente does hereby resolve as follows:

Section 1. The City Council supports the passage of H.R. 3643 and urges the Department of Energy to implement the prompt and safe relocation of Spent Nuclear Fuel from SONGS to a licensed and regulated Interim Consolidated Storage Facility, and supports the development and passage of complementary legislation.

PASSED AND ADOPTED this 2nd day of February, 2016.

ATTEST:

  
City Clerk of the City of  
San Clemente, California

  
Mayor of the City of San  
Clemente, California

STATE OF CALIFORNIA )  
COUNTY OF ORANGE ) §  
CITY OF SAN CLEMENTE )

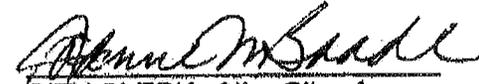
I, JOANNE BAADE, City Clerk of the City of San Clemente, California, do hereby certify that Resolution No. 16-04 was adopted at a regular meeting of the City Council of the City of San Clemente held on the 2nd day of February, 2016, by the following vote:

AYES: BROWN, DONCHAK, HAMM, WARD, MAYOR BAKER

NOES: NONE

ABSENT: NONE

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this 3rd day of FEB., 2016.

  
CITY CLERK of the City of  
San Clemente, California

Approved as to form:

/s/ Scott Smith  
City Attorney

I, JOANNE M. BAADE, CITY CLERK OF THE CITY OF SAN CLEMENTE, STATE OF CALIFORNIA, HEREBY CERTIFY UNDER PENALTY OF PERJURY THE FOREGOING INSTRUMENT TO BE A FULL, TRUE AND CORRECT COPY OF THE ORIGINAL NOW ON FILE IN MY OFFICE.

DATE: 5/4/17   
JOANNE M. BAADE  
CITY CLERK  
BY: \_\_\_\_\_



April 25, 2017

Chair Dayna Bochco  
California Coastal Commission  
45 Fremont Street  
San Francisco, CA 94105

RE: CDP # 9-15-0162 – Southern California Edison SONGS Spent Fuel Pool Island Project

Dear Chair Bochco,

The City of Laguna Beach respectfully asks that the California Coastal Commission reconsider its October 6, 2015, decision to grant a coastal development permit to Southern California Edison (SCE) to construct and operate an Independent Spent Fuel Storage Installation (ISFSI) to store spent nuclear fuel from San Onofre Nuclear Power Station (SONGS) Units 2 and 3. The City's primary mission is to protect its residents, something we believe this permit jeopardizes.

The Coastal Commission's ISFSI permit has several significant flaws, including the following:

***Seismic Risk*** – The permit that was granted to SCE cites the need to protect the spent nuclear fuel from seismic events through undergrounding. However, it does not address the several dozen spent fuel canisters that are stored above ground, as well as the cooling pools that are adjacent to the reactors, which are also extremely vulnerable. Any plan for interim nuclear storage should address all aspects of nuclear waste and should be a part of a system that removes the risks of seismic events entirely.

***Consent Based Storage*** – Any storage of spent nuclear waste should include the consent of nearby local jurisdictions. Considering that this spent nuclear fuel will likely remain on the SONGS property for decades, if not longer, it is important to take into consideration the wishes of the surrounding communities and the risks it portends for the 8.4 million people who live within 50 miles of the San Onofre.

***Design and Transportation*** – The canisters that are proposed to be undergrounded are not designed to be moved once stored. If a permanent or interim repository for spent nuclear waste becomes available after the canisters are undergrounded, it is unclear if they will be safe to transport. This could potentially ensure that the nuclear waste will stay onsite at SONGS in perpetuity, further exacerbating the safety concerns for our residents.

***Environmental/Safety Concerns*** – This permit allows 3.6 million pounds of spent nuclear fuel to be stored along the coast of the Pacific Ocean. The ramifications of potential ocean/coastal

Chair Dayna Bochco  
April 25, 2017  
Page 2

contamination from this fuel is crippling. Due to the high probability of sea level rise, coastal erosion, and other natural occurrences that could impact the undergrounding of spent nuclear fuel on the coast, the SONGS site is a poor location for this material.

***Emergency Services*** – Unlike Diablo Canyon, SONGS is not required to maintain emergency services throughout the decommissioning process. This is unacceptable given the questionable geology of the permitted interim storage site.

For the above reasons, the City of Laguna Beach respectfully asks that the Commission reconsider granting SCE the ISFSI permit for spent nuclear fuel storage at SONGS. Instead, the City urges SCE, the State, and the Federal government to find a more viable and less dangerous location for interim and permanent storage.

If you have any questions about how this permit and the interim storage of nuclear fuel affects our City and surrounding community, please do not hesitate to contact me.

Sincerely,



Toni Iseman  
Mayor  
City of Laguna Beach

cc:

Laguna Beach City Council  
California Coastal Commissioners  
John Ainsworth, California Coastal Commission Executive Director  
U.S. Senators Dianne Feinstein and Kamala Harris  
U.S. Representative Darrell Issa  
Senator Pat Bates  
Assembly Member Bill Brough  
City of Oceanside Mayor Jim Wood  
City of San Juan Capistrano Mayor Kerry Ferguson  
City of Dana Point Mayor Debra Lewis  
City of San Clemente Mayor Kathleen Ward  
Cori Williams, Townsend Public Affairs  
Eric O'Donnell, Townsend Public Affairs  
Concerned Coastal Communities Coalition

**From:** [Donna Gilmore](#)  
**To:** [David G. Victor](#); [Dan Stetson](#)  
**Cc:** [Victor Cao](#); [Debra Lewis](#); [Pam Patterson](#); [Tom Palmisano](#); [Lori Donchak](#); [Kathy Ward](#); [Street, Joseph@Coastal](#); [Ken Alex](#); [Shari Horne](#); [Andrew Andy R. Griffith](#); [Oggins, Cy@SLC](#); [Commissioner Jeff Baran](#)  
**Subject:** Critical decommissioning issues related to spent fuel dry storage  
**Date:** Thursday, September 21, 2017 11:46:27 AM

---

These Sierra Club comments to the NRC address the misleading claims by Edison of low risk of thin-wall canister failure and the consequences claiming there could be no explosion.

Please include this email and the linked document as comments to the Community Engagement Panel meeting. With only three minutes to speak and no ability to have public discussion on the misleading information at this meeting many people were misinformed.

<https://sanonofresafety.files.wordpress.com/2011/11/sierraclubnrc-decomcomments2016-03-18.pdf>

Also, Edison did not share the fact they asked their Areva NUHOMS thin-wall canister vendor to submit Amendment #4 to the NRC that would allow Edison and others to eliminate empty spent fuel pools, eliminating the only NRC approved on-site method to replace canisters.

In addition, the NUHOMS Amendment would allow **hiding high radiation readings from leaking canisters**. It would eliminate the requirement to measure or report readings from the air outlet vents. This is where the highest levels would occur when a canister is leaking.

The amendment would also remove requirements to inspect for clogged air vents, instead relying on temperature monitoring. In addition, it would allow raising alarm levels on the temperature monitors.

Based on these facts and the lack of adequate inspection technology to find cracks, it appears Edison's real plan is to hide radiation leaks from the public and the NRC. If the NRC approves this amendment, Edison will be able to say "we meet all NRC requirements".

There was also no mention that the Holtec transport cask the NRC approved allows transport without checking canisters for cracks and without checking contents for damage prior to transport (ignoring the NRC's own regulations and their engineers concerns).

It also wasn't mentioned there is no approval for unloading canisters at the destination. Who in their right mind would ever believe the NRC would approve a transport cask without approval for unloading it?

There was also no mention at the CEP meeting that transport requires going through Los Angeles by rail and that an accident en route could result in a large permanent evacuation zone.

I asked Manuel Camargo (Edison project manager) after the meeting why Edison selected Holtec. He said he didn't know. I asked him what person or persons made the decision. He was non-responsive, but said it wasn't him and wasn't Tom Palmisano.

I would like to know who we can hold personally accountable for the permanent evacuation of Southern California communities?

Edison's refusal to allow bids for thick-wall casks that already meet basic safety requirements (inspectable inside and out, don't crack, repairable, maintainable and with an early warning system to fix problems before leaks occur) is unconscionable.

Those 51 existing canisters may start leaking in 3 years, maybe sooner, but likely not much later, means this problem is now.

These canisters are now up to 14 years old. Tom Palmisano admitted at the CEP meeting canisters have no seismic certification if partially cracked. Since they know they may have partial cracks and cannot prove that they don't have cracks (since they cannot be inspected), they in essence have no seismic certification.

The recent earthquakes in Mexico reminds us of our high earthquake risks. With no assurance of earthquake safety of these 51 canisters, Edison needs to step up and do the right thing or be forced to. Those canisters must be replaced ASAP. Loading of Holtec thin-wall canisters must be stopped until Coastal Commission Special Conditions can be met, which is impossible with the Holtec canisters. The NRC should not grant an ISFSI site license to load these inferior canisters in the Holtec holes in the ground, and the NRC should reevaluate the existing Areva NUHOMS site license.

Each canister contains about as much highly radioactive Cesium-137 as was released from the Chernobyl disaster.

We cannot afford to wait. The problem is now.

See link for more detailed recommendations.

<https://sanonofresafety.files.wordpress.com/2011/11/drystoragerecommendationsdg2017-08-24fivepage.pdf>

Donna Gilmore

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

**From:** [Kevin Arnold](#)  
**To:** [Street\\_Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Subject:** San Onofre Nuclear Waste  
**Date:** Tuesday, September 19, 2017 1:48:18 PM  
**Attachments:** [image002.png](#)

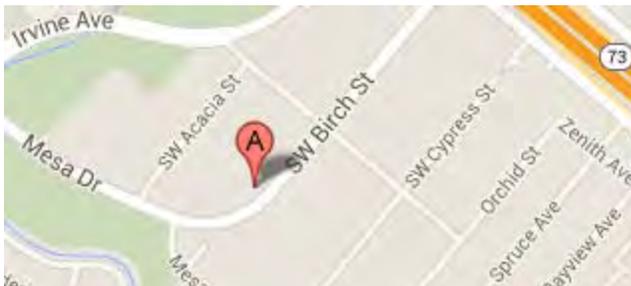
---

Please think through this, you really can't be serious about burying nuclear waste at the water's edge. One big storm could ruin everybody's day/life!

Kevin Arnold



Kevin B. Arnold | Managing Partner  
20341 Birch Street, Suite 330  
Newport Beach, CA 92660  
Direct Tel. 949-200-1562  
Toll Free 877-762-6208  
Fax 949-200-1546  
[www.cviewip.com](http://www.cviewip.com)  
[kevin@cviewip.com](mailto:kevin@cviewip.com)



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**From:** [Donna Gilmore](#)  
**To:** [Decommission San Onofre](#); [NFC Summit Group](#); [NoNukesYall](#)  
**Cc:** [Dan Stetson](#); [Ace Hoffman](#); [Susana Reyes](#); [George Watland](#)  
**Subject:** HI-STAR 190 Universal Transport Cask Licensed by the USNRC and SNRIU (Ukraine)  
**Date:** Tuesday, September 19, 2017 8:01:15 AM

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Holtec doesn't mention in the below propaganda press release that NRC management ignored their own transport regulations against transporting cracking canisters and uncanned damaged fuel, and didn't include approval for unloading the canister at the transport destination. They ignored their own engineering staff concerns.

NRC is not requiring inspection of the canister for cracks or inspection of the canister contents before transport.

Rather than requiring nuclear facilities to use thick casks that don't crack and that can be inspected, and casks can be transported without a separate transport cask, they instead risk the country's safety, potentially creating permanent evacuation zones in transport and storage.

They know a **two year old** Diablo Canyon canister has all the conditions for cracking.

They know fuel cladding can become damaged after dry storage.

They know they are approving storage sites with no method to deal with leaking canisters.

They know train vibrations may be enough to cause high burnup fuel cladding (fuel rods) to become damaged.

They know operating data from burned (irradiated) fuel rods proves hydrogen and other gases build up in the fuel rods with medium and high burnup fuel. The majority of San Onofre fuel falls in this range. See Chart.  
<https://sanonofresafety.files.wordpress.com/2014/03/waste-graph.jpg>

They know allowing extremely high radiation and heat levels in the transport cask means employees are not safe near the bottom of the transport cask. They have special ALARA warnings in the Safety Analysis Report, telling employees to stay away from the bottom (back end) of the transport cask. ALARA means "as safe as reasonably achievable", not as safe as it should be).

They also are unsafely reducing pool cooling time of fuel assemblies, prematurely loading too hot and too radioactive fuel in the thin-wall canisters. NRC technical staff did not want to approve this, claiming Holtec had not provided good evidence. The compromise made was, well, go ahead and load a canister and we'll see how it works out. We've just become another unwilling experiment for Holtec and Edison.

<https://sanonofresafety.org/holtec-hi-storm-umax-nuclear-waste-dry-storage-system/>

Donna Gilmore  
SanOnofreSafety.org

949-204-7794  
donnagilmore@gmail.com

----- Original message -----

From: Holtec International <holtec@holtecinternational.com>

Date: 9/18/17 1:18 PM (GMT-08:00)

To: donnagilmore@gmail.com

Subject: The HI-STAR 190 Universal Transport Cask Licensed by the USNRC and SNRIU (Ukraine)

Download HH 32.24 →



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## The HI-STAR 190 Universal Transport Cask Licensed by the USNRC and SNRIU (Ukraine)

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*HI-STAR 190 with canister in view*

We are pleased to report that HI-STAR 190, designed with the lofty goal to transport used nuclear fuel produced by *any* commercial reactor, has received its initial certification from the USNRC and the Ukrainian regulator, SNRIU. The initial license by the USNRC includes Holtec's largest canisters MPC-37 (PWR) & MPC-89 (BWR). VVER canisters MPC-31 & MPC-85 have been certified for transport in HI-STAR 190 by SNRIU. Other canister types, supplied by Holtec and other cask suppliers and in use at various nuclear plants, will be submitted for certification at a later date to meet our clients' evolving needs.



*HI-STAR 190 transport package without support saddles and personnel barrier*

The first batch of HI-STAR 190s is being co-produced by our plants in Pittsburgh (Holtec Manufacturing Division) and Camden (Advanced Manufacturing

Division). They will be used for delivering loaded canisters from Ukraine's nuclear plants to the nation's Central Spent Fuel Storage Facility being built in the north of the country.

"HI-STAR 190 is the 'alpha-cask' in our fleet of casks; it is the most heavily shielded, most versatile and most rugged cask in the nuclear industry. It exquisitely fulfills our corporate mission to design casks that provide utmost protection of public health and safety. We thank the NRC and SNRIU for their diligent reviews and for meeting a challenging review schedule on a technically complex cask," says Holtec's VP of Engineering, Dr. Stefan Anton.

HI-STAR 190 will be our workhorse for transporting the canisters from the on-site ISFSIs to the Consolidated Interim Storage Facility in southeast New Mexico, called HI-STORE CIS, being developed in collaboration with our local community partner, ELEA, LLC. ELEA's chairman, Mr. John Heaton, hailed the licensing of HI-STAR 190, calling it a "major step towards making HI-STORE CIS a reality and towards meeting the needs of restive communities in California and elsewhere wishing to convert their nuclear plant sites to non-power generation use."

---

For more information, please contact:

**Erika Grandrimo**, Publisher

Phone: (856) 797-0900, ext. 3920 | Email: [e.grandrimo@holtec.com](mailto:e.grandrimo@holtec.com)



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**From:** [Joan Steiker](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** San Onofre Nuclear Waste  
**Date:** Monday, September 18, 2017 3:29:20 PM

---

Dear Mr. Street,

I am writing you today as a concerned citizen living in Coto de Caza, CA. I am in complete shock after attending a meeting last night regarding the FRIGHTENING reality we face if we do not make RAPID CHANGES to the plans in place concerning the storage of the Nuclear Waste at San Onofre,

How can the Coastal Commission expect Southern California Edison to meet the Special Conditions on the Coastal permit for San Onofre nuclear waste storage?

The Coastal Commission special conditions must be met NOW not deferred 20 years.

PLEASE CONSIDER THIS:

Southern California Edison is storing 3.6 Million pounds (1632 metric tons) of highly radioactive nuclear waste in **unsafe containers in an unsafe location** at the San Onofre Nuclear Facility. We urgently need your help before major radioactive leaks force permanent evacuation of major regions of California.

**H.R. 3053 “The Nuclear Waste Policy Amendments Act of 2017”** and similar interim nuclear waste storage bills **do not solve these urgent problems** and contain amendments that will increase our risks for major radioactive leaks. Time is of the essence.

I've lived in Orange County for 37 years, and as a parent and a very concerned resident, I would hate to see our environment destroyed by the unsafe storage of nuclear waste. I hope that SCE will have to use much safer canisters and store the waste in a safer environment.

Thank you for your time and consideration.

Joan Steiker

78 Via Candelaria

Coto de Caza. CA 92679

78

**From:** [Donna Gilmore](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** Areva slides - Edison plans to remove spent fuel pool and other concerns  
**Date:** Monday, September 18, 2017 3:10:49 PM  
**Attachments:** [ML17254A086.pdf](#)

---

Hi Joseph,

Areva is planning to submit an application to amend the license for the existing canister system install at San Onofre. It allows them to remove spent fuel pools, only check inlet air vents and door rather than outlet air vents for peak radiation levels, and other changes as you'll see in this slide presentation. Were you aware of these changes? How could they ever transport the fuel or replace cracking canisters, if they have no pool? Tom Palmisano did not answer this questions when asked this at the recent Community Engagement Panel meeting.

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML17254A086>

Donna Gilmore  
SanOnofreSafety.org  
949-204-7794

On 9/8/2017 4:13 PM, Street, Joseph@Coastal wrote:

Hi Donna,

I can confirm that Coastal Commission spent fuel storage briefing is scheduled for the morning of Wednesday, October 11, the first day of the October Commission meeting. The venue is the Chula Vista City Council Chambers. The agenda hasn't been finalized yet, but this isn't likely to change.

Best,  
Joe

Joseph Street, Ph.D  
Senior Environmental Scientist  
Energy, Ocean Resources & Federal Consistency Division  
California Coastal Commission  
45 Fremont St. Suite 2000  
San Francisco, CA 94105  
(415) 904-5249  
[joseph.street@coastal.ca.gov](mailto:joseph.street@coastal.ca.gov)  
<http://www.coastal.ca.gov/>



Virus-free. [www.avg.com](http://www.avg.com)



**From:** [Reed Johnson](#)  
**To:** [Street, Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Cc:** [Gary Headrick](#)  
**Subject:** Coastal Development Permit #9-15-0228  
**Date:** Friday, September 15, 2017 8:57:07 AM

---

Dear Mr. Joseph Street -

As long time residents of San Clemente, my wife and I respectfully request that the San Onofre Nuclear Waste Storage Permit be revoked sooner rather than later based on the following:

### **REVOKE Nuclear Waste Storage Permit**

- The California Coastal Commission has placed Special Conditions on the Coastal permit for San Onofre nuclear waste storage that will likely be impossible to meet.
- The Special Conditions include a system that can be inspected, repaired, maintained, monitored, and transported without cracks – but only after 20 years(?!).
- The Coastal Commission acknowledges the current Holtec system does not meet these requirements, but believes Edison's promises that these problems will all be solved sometime in the future.
- However, there is insufficient evidence to support this promise and there is actually evidence to the contrary.

### **Coastal Commission special conditions must be met now not deferred 20 years. Facts:**

- Thin (1/2" to 5/8" thick) stainless steel canisters can crack, cannot be inspected, repaired, maintained or adequately monitored.
- A Sandia Lab report shows once a crack starts it can penetrate hot canister walls in 5 years or less(!).
- The existing 51 thin canisters may already have cracks.
- The Holtec canister President says canisters cannot be inspected or repaired yet warranty is only 10 years(!) for the concrete structure and 25 years(!) for the thin canisters.
- Cracked canisters cannot be transported.
- Canisters need up to 45 years(!) cooling (after removed from reactor)

before transport per DOT.

- Spent fuel must cool in the pools for a few years, so choosing proven thick storage casks will not significantly delay removing fuel from pools.
- Edison plans to destroy the spent fuel pools.
- No funds available to relocate system.
- Edison can meet Coastal requirements with thick casks.

Thank you in advance for your assistance with this very important matter.

Reed & Arlene Johnson  
San Clemente

**From:** [Marycie Hagerty](#)  
**To:** [Street, Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Subject:** Revoke the Coastal permit for the San Onofre waste storage dump.  
**Date:** Thursday, September 14, 2017 12:26:20 PM

---

Dear Joseph Street,

Since Edison and Citizens Oversight has allowed the California Coastal Commission permit, which allows Edison to bury nuclear waste precariously at edge of our ocean, near an earthquake fault, I am writing you today to protest this terrible decision, affecting the safety of all SoCal citizens. You yourself and your family must not live anywhere near San Onofre, or you would be fighting for the safety of the people, including yourself.

The Coastal Commission should require a system that does not have thin canister walls that can easily crack, and you should not accept promises of future solutions (which will never be met!). The NRC states it takes about 16 years for a crack to go through the wall of thin stainless steel canisters. A Diablo Canyon canister has all the conditions for cracking in a 2-year old canister: [bit.ly/SAND2015-2175R](http://bit.ly/SAND2015-2175R)

The existing 51 thin canisters may already have cracks. Fuel loading into thin canisters began in 2003, so Coastal Commission "special conditions" for aging management and related issues should be required now, before it is too late! And cracked canisters cannot be transported. NRC Regulation 10 CFR § 71.85.

More nuclear waste will likely be buried at San Onofre before the end of the year. However, Edison's own projections say that the last canister won't be cool enough to be transported until at least 2035, well beyond the intended lifespan of these temporary containment structures. Edison escapes all liability for any "accidents" the way it is written now. It only takes one bad canister to release the equivalent of the Chernobyl disaster, which would make most of SoCal uninhabitable. Again you must not live close to the rest of us concerned about having highly radioactive spent fuel on an earthquake fault a few feet from the Pacific Ocean!

To doing the right thing,

Marycie Hagerty  
760-602-5096

**From:** [Cheriel Jensen](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** San Onofre Nuclear Spent Fuel Storage  
**Date:** Wednesday, September 13, 2017 10:44:00 PM

---

Cheriel Jensen, 13737 Quito Road, Saratoga, CA 95070  
408 379-0463

Coastal Commission

Dear Commissioners,

San Onofre Nuclear Spent Fuel Storage

Please revoke the nuclear storage permit for SanOnofre. The thin wall containers are known to crack in just a few years. This could result in a catastrophe. No nuclear storage belongs on the beach next to the ocean. You are the adults in the room. You must require moving the storage away from the beach and encased in heat-ventilated-thick walled containers. It must be done now, not in 20 years.

The difficulty with SanOnofre will be repeated as to Diable Canyon. No additional fuel should be permitted on site there as every bit of it will also cause that much more of these problems. Diablo Canyon should be shut down NOW.

Yours truly,

Cheriel Jensen

**From:** [Todd Snyder](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** Revoke the Coastal permit for the San Onofre waste storage dump  
**Date:** Wednesday, September 13, 2017 10:27:06 PM

---

As a concerned citizen, I urge you to revoke Coastal Development Permit # 9-15-0228.

The California Coastal Commission put special conditions on the permit and they must be met now, not deferred for 20 years.

However, there is strong evidence that the special conditions on San Onofre nuclear waste storage will never be met.

Revoke the permit now!

Thank you,  
Todd Snyder  
San Francisco, CA

**From:** [Wendy Morris](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** San Onofre nuclear waste storage site  
**Date:** Wednesday, September 13, 2017 8:08:47 PM

---

How in the world can it be OK to allow nuclear waste storage at San Onofre?  
It is much too dangerous to store it in the proposed Yucca mountain.  
It is much too dangerous to transport it in its current form.  
How can it be OK to store it in thin canisters that cannot be inspected, just feet from the ocean, barely above the water table, in this highly populated area waiting for the "Big One" to happen at any time?  
Can you answer me?  
No?  
Then:  
Revoke the permit.

Sincerely,  
Wendy Morris  
San Clemente, CA  
[beachwendy@gmail.com](mailto:beachwendy@gmail.com)

**From:** [Patrick Bosold](mailto:Patrick.Bosold)  
**To:** [Street, Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Cc:** [bosolds@lisco.com](mailto:bosolds@lisco.com)  
**Subject:** citizen comment on Calif. Coastal Commission permit for San Onofre nuclear waste storage  
**Date:** Wednesday, September 13, 2017 4:37:54 PM

---

Dear Mr. Street,

I campaigned in 1972 for passage of the California Coastal Conservation ballot initiative, including a bicycle ride from San Francisco to San Diego in a grassroots effort to counter \$20 million in campaign spending against the initiative by real estate and power utility interests. I did this because it was alarmingly obvious that California's coastline needed much more protection than it had under state and federal law at that time. That ballot initiative became law. While I no longer live in California, I remain interested in the protection and preservation of the coastline that is under the Commission's jurisdiction.

California's coastline near San Onofre now needs the Coastal Commission's help. Urgently.

As you may already know, there was a settlement between Southern California Edison and Citizens Oversight regarding the California Coastal Commission permit allowing Edison to bury nuclear waste precariously at edge of the Pacific ocean. **This permit was a huge mistake. It must be revoked immediately.** The "Special Conditions" that were required for approval of that permit should have been met BEFORE granting the permit, not after 20 years. Edison provided insufficient evidence that they can meet the Special Conditions of the permit now or in the future.

More nuclear waste will likely be buried at San Onofre before the end of the year. However, Edison's own projections say that the last canister won't be cool enough to be transported until at least 2035, well beyond the intended lifespan of these temporary containment structures. They admitted to the California Public Utilities Commission (CPUC) it will be "unlikely" the DOE will take the fuel by that date. There is no way to avoid this reality and it is questionable whether the canisters will meet transportation requirements and that anyone will be willing to accept this waste especially if they know how unsafe it is. Unfortunately, it only takes one bad canister to release the equivalent of the Chernobyl disaster which contaminated much of Europe in 1986. There are 51 aging, thin canisters, or "Chernobyl Cans", sitting out in the open, with 73 more to be partially buried in silos one hundred feet from the Pacific Ocean and barely above the water table. Not nearly enough is being done about this most imminent threat.

These ticking time bomb Chernobyl cans (up to 14 years old) may already be cracking and could start leaking in a few years. NRC documents indicate that a comparable container cracked and leaked in only 17 years. Edison has no intention to address this issue, making any shipment unlikely. Instead, they plan to remove the spent fuel pools which is the only NRC approved plan at San Onofre to replace cracking canisters.

**I urge you and all of the authorities with a say in this matter to require Edison to use THICK CASKS, NOT THIN CANS, to store all of the radioactive waste from their San Onofre power plant. Nuclear fuel waste must be moved from the existing 51 thin cans to thick casks that meet all Coastal Commission special requirements and meet basic safety requirements we expect in an automobile: ability to inspect, maintain, repair and**

**monitor to PREVENT major problems. And be TRANSPORTABLE.**

Sincerely,

Patrick Bosold  
Former California resident  
202 N. 5<sup>th</sup> St., Fairfield, IA 52556

**From:** [LOUGENE ANDERSON](#)  
**To:** [Street, Joseph@Coastal](mailto:Street, Joseph@Coastal)  
**Subject:** San Onofre  
**Date:** Wednesday, September 13, 2017 4:17:53 PM

---

Please revoke the permit for the San Onofre storage dump. We are all in grave danger if Edison is allowed to proceed as planned.

**From:** [Donna Gilmore](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** Edison's plan to Remove the pools ML17254A086.pdf  
**Date:** Monday, September 11, 2017 4:10:14 PM  
**Attachments:** [ML17254A086.pdf](#)

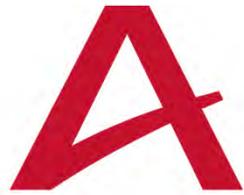
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The attached slides are from a 9/11/2017 preapplication meeting where Areva wants to Amend their dry storage license in order to

- **eliminate requirements for a spent fuel pool,**
- remove requirements for inspecting concrete overpack air vents, and
- change peak radiation dose rates for the inlet air vents. This affects the existing 51 San Onofre canisters (Areva NUHOMS 24PT1 and 24PT2 thin-wall canisters).

From Slide 6

- *For future decommissioning needs, clarify the TS [Technical Specifications] and UFSAR [Final Safety Evaluation Report] to remove any explicit requirements for a spent fuel pool after all spent fuel has been loaded into the AHSM or AHSM-HS [dry storage system] at the ISFSI [Independent Spent Fuel Storage Facility]*
- *Credit the use of the installed temperature monitoring system in lieu of performing daily visual vent inspections for the 24PT1 DSC (as currently allowed for the 24PT4 and 32PTH2 DSCs)*
- *Provide TS [Technical Specifications] AHSM dose rate limits for the 24PT1 and 24PT4 DSCs [thin-wall canisters] to provide peak dose rates on the front inlet bird screen and the door of the concrete storage module –similar to those currently provided for the AHSM-HS*



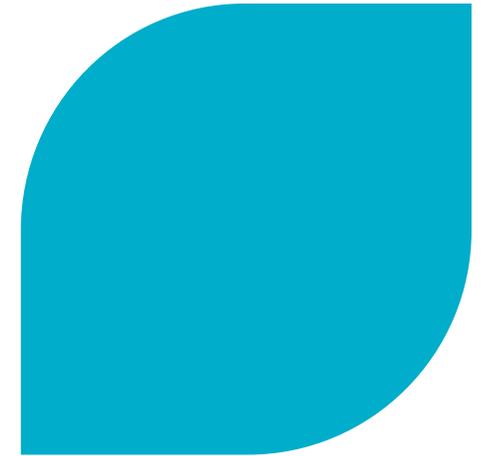
**AREVA**

forward-looking energy

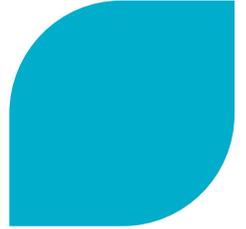
# CoC 1029 Amendment 4 NRC Pre-Application Meeting

**Don Shaw**  
**TN Americas Licensing Manager**  
**September 11, 2017**

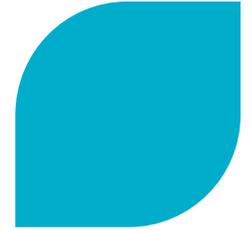
**TN Americas LLC**



# Agenda



- ▶ **Purpose**
- ▶ **Desired Outcome**
- ▶ **Amendment Background and Scope**
- ▶ **Schedule**
- ▶ **Discussion and Public Comments**



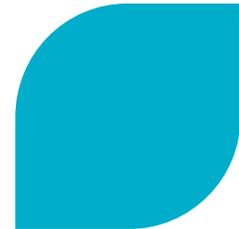
# Purpose and Desired Outcome

## ▶ Purpose

- ◆ Discuss TN's plans for CoC 1029 Amendment 4

## ▶ Desired Outcome

- ◆ Have a clear, common understanding of the approach for Amendment 4, including scope and schedule
- ◆ Receive feedback from the NRC staff

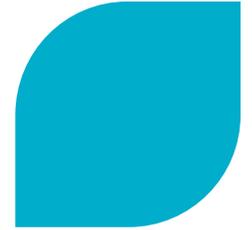


# Amendment Background and Scope

## Need for Amendment

- ◆ **Total clarity regarding TS and the Spent Fuel Pool**
- ◆ **Operational flexibility and consistency for certain HSM daily checks**
- ◆ **Consistency for HSM dose rate measurements, to better align with NEI 99-01 and support site emergency plan**
- ◆ **Elimination of cause of spurious alarms**

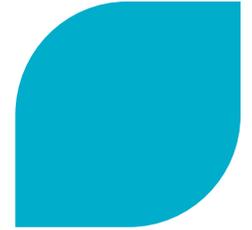
# Amendment Background and Scope



## Scope

- ◆ No changes to DSC contents or design
- ◆ For future decommissioning needs, clarify the TS and UFSAR to remove any explicit requirements for a spent fuel pool after all spent fuel has been loaded into the AHSM or AHSM-HS at the ISFSI
- ◆ Credit the use of the installed temperature monitoring system in lieu of performing daily visual vent inspections for the 24PT1 DSC (as currently allowed for the 24PT4 and 32PTH2 DSCs)
- ◆ Provide TS AHSM dose rate limits for the 24PT1 and 24PT4 DSCs to provide peak dose rates on the front inlet bird screen and the door of the concrete storage module – similar to those currently provided for the AHSM-HS

TN Americas ... Be certain.™

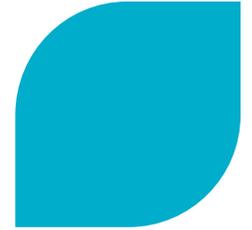


## Amendment Background and Scope (continued)

- ◆ **Update the limit for temperature increase associated with a blocked vent accident condition for 24PT4 based on Dual Thermocouple Locations.**
  - **Background (Technical Specification 5.2.5 (b))**
    - **TS Limits for Temperature Monitoring of AHSM with 24PT1 and 24PT4 are based on a single thermocouple location denoted as “Monitored Location”**
      - **Limits are 80 °F rise in 24 hours for 24PT1 and 30 °F rise in 12 hours for 24PT4**
    - **To ensure redundancy, a dual thermocouple option was implemented via a design change (72.48). Equivalent temperature rise at the dual thermocouple “Monitored Location” was determined using the same method of evaluation (MOE) as in the CoC 1029 UFSAR. The equivalent limits are:**
      - **8 °F rise in 24 hours for the 24PT1 and 5 °F rise in 12 hours for the 24PT4**
    - **This small temperature increase limit for 24PT4 results in spurious alarms necessitating visual inspections to ensure there is no blockage of the AHSM vents.**
    - **The thermal analysis of the AHSM in CoC 1029 Amendment 1 for the 24PT4 was performed using a combination of ANSYS FLUENT (Normal/Off-Normal) and HEATING7 (Blocked Vent Accident). This combination of software introduced additional conservatism.**

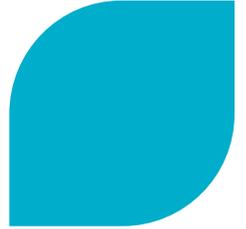
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## Amendment Background and Scope (continued)



- **Analysis - provide a new blocked vent accident analysis using ANSYS FLUENT.**
  - This change in MOE necessitates NRC review.
  - Temperature rise limit for 12 hours and 25 hours re-evaluated based on new evaluation.
  - Preliminary results show a temperature rise of 9 °F at 12 hours and 24 °F at 25 hours after the start of the blocked vent accident condition.
- ◆ **UFSAR will be updated to include the ANSYS FLUENT evaluation for temperature rise.**
- ◆ **To address the spurious alarms, the TS will be updated based on the 24PT4 dual thermocouple location results.**

# Schedule



- ▶ **Application Submittal: November 30, 2017**
- ▶ **Requested Approval: Effective Date no later than March 31, 2019**



# Discussion & Public Comments

- ▶ **Open Discussion**
- ▶ **Comments**
- ▶ **Questions**

**From:** [Donna Gilmore](#)  
**To:** [Street\\_Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Subject:** Fwd: Re: [N3Yall] Re: Radioactive Waffles Anyone? Re: if thin-wall canisters at been used at Fukushima "the catastrophe would have been immeasurably worse and more widespread"  
**Date:** Wednesday, September 06, 2017 7:01:46 PM

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These are some of the conversations in the activist community with Ray. I don't know anyone in our community supporting the settlement, if they have read it.

One of the false premises is technology can be developed that can adequately inspect loaded thin-wall canisters for cracks. Ray and Aguirre believe that.

This document dispells that myth.

[Chloride stress corrosion cracking in austenitic stainless steel. Assessing susceptibility and structural integrity. UK, prepared by the Health and Safety Laboratory for the Health and Safety Executive, 2011 R Parrott, et. al., SK17 9JN.](#) The following applies to inspections in vessels and pipes, but indicates the limitations of various inspection options, even in containers without spent nuclear fuel.

...Leak detection is not a reliable indicator of CLSCC [chloride stress corrosion cracking] because cracks are highly branched and may be filled with corrosion products. Nevertheless, it is recommended that where pipework or vessels develop leaks in service, they should always be investigated for possible CLSCC by NDE non-destructive examinations] or by in-situ metallography.

CLSCC can generate very large cracks in structures where, as in the case of reactors, the residual stress from welding dominates and operational stresses are low by comparison. If undetected by NDE, the large cracks might introduce failure modes with consequences that were not anticipated by the original design, e.g. complete separation of attachments, toppling of tall columns under wind loading or collapse of long pipe runs due to self-weight.

**The simplest and most effective NDE technique for detecting CLSCC is dye penetrant testing. Eddy Current Testing (ECT) is effective with purpose-designed probes that have been calibrated on known defects. ECT was found to be ineffective on the samples from the reactor due to limited penetration of the current and sensitivity to surface imperfections that could not be distinguished from cracking.**

Crack sizing by eddy current testing may be limited and is not possible by penetrant testing.

Ultrasonic flaw detection can be applied as a manual or an automated NDE technique for detecting CLSCC. For structures with complex design features and welds as on the reactors, the trials indicated that ultrasonic testing would require a range of probes, several complimentary scans and be very time consuming. Ultrasonic flaw detection did not cover all design details and possible crack position orientations found on the reactor, and crack sizing was difficult.

<http://www.hse.gov.uk/research/rrpdf/rr902.pdf>

They won't be able to move these canisters after they start leaking. We'll be the ones moving. Permanently.

It amazes me no one in state government is speaking out against this. I thought we were better than this, given the consequences.

Donna Gilmore  
SanOnofreSafety.org  
949-204-7794

**From:** [Ace Hoffman](#)  
**Subject:** San Onofre's battle for the future: The NIMBYs versus the realists...  
**Date:** Wednesday, August 30, 2017 11:58:50 AM

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August 30th, 2017

The agreement concluded earlier this week between Southern California Edison and Citizen's Oversight is a complete waste of activists' energy -- or worse.

It accomplishes nothing but to assuage the fears of the most poorly-educated "Interested Parties." It does not protect California, it does not put a single dent in the nuclear industry or Southern California Edison's profits (the money for the agreement will come out of ratepayer's pockets). In fact, it gives the nuclear industry a go-ahead to keep on creating nuclear waste and confirms that concerned citizens can be hoodwinked -- along with their lawyers.

Not only that, but those citizens who signed the agreement have -- in writing -- the "affirmative duty to support the settlement and its costs" before the California Public Utilities Commission, by "offering testimony in support of a CPUC application to approve costs associated with the transportation and storage of SONGS Spent Fuel."

In other words, the approximately \$4 billion dollars that ratepayers have ALREADY put into the "decommissioning fund" will NOT be used for offsite storage costs, or costs of transportation thereto. Ratepayers will be expected to pay those additional costs -- whatever they may be, and however long they last.

Not one citizen ever signed on to centuries of cost burdens for storing nuclear fuel that is no longer "commercially reasonable" to use. "Commercially Reasonable" is a phrase that comes up often in the agreement: It means SCE can do nothing if the cost is too high, and does not need to balance potential risks against cost benefits -- if a transportation and offsite storage plan meets the minimal Nuclear Regulatory Commission standards for safety -- standards which are way too lax -- SCE can do it if they want to, but don't have to if the cost is too high by some "Commercially Reasonable" standard they can make up as they go along.

SCE can -- and will -- just let the waste sit where it is, on the beach, letting salt corrode the containments day by day, for decades or even centuries. Until long after they're out of business.

Moving the waste to another location is NOT a solution to the nuclear waste problem. It's a transference of risk, and according to the agreement, must also include a transfer of liability. In fact, it's worse than no solution at all: The agreement enables other old, corroding and decaying nuclear power plants (such as Palo Verde, Diablo Canyon, Indian Point and more than 90 other operating old reactors in America) to claim they've "solved" the waste problem and keep operating, and keep making more waste, and keep transferring liability to others.

When the plants were built, the public was assured the waste would be removed as soon as it was cool enough to transport -- about five years at the time, although the more highly enriched fuel used by most reactors today generally requires even longer. The spent fuel pools (every reactor has one) were made to accommodate only about five years worth of highly toxic (radioactively) and exceedingly hot (thermally) spent fuel under 40 feet of water. A new spent fuel pool today would cost nearly a billion dollars.

The years went by, and there was still no place to put the waste. And America didn't need to extract plutonium from the "spent" nuclear fuel for bombs anymore (we have more than enough of that already for the thousands of nuclear bombs we still maintain). In any case, reprocessing proved too expensive and too polluting to bother with when mining uranium (and poisoning uranium miners) was (and is) cheap in comparison to reprocessing costs. So the utilities just started packing the spent fuel tighter and tighter together in the pools at each nuclear power reactor site.

The pools eventually got so full after being reracked again and again, that even a lax federal safety

standard could not be met. (Reracking is a risky business in itself: Virtually every fuel bundle needs to be lifted and rearranged in order to pack older fuel in amongst the newer fuel, to keep the maximum thermal temperature and radioactivity as low as possible. A few years ago San Onofre dropped a large heavy metal beam used for that purpose into the pool because its equipment is so old.)

When the pools couldn't accommodate any more spent fuel, the reactor companies turned to "temporary" dry cask storage. Dry cask storage is MUCH cheaper than building a new spent fuel pool. Whether it is safer is highly debatable, but even if it is in some ways safer, on the other hand, by enabling the reactor to keep operating and create more and more spent fuel, any conclusion that dry cask storage is safer than pool storage per ton of fuel is counterbalanced by the increased amount of fuel that must be stored -- and by the operating reactor itself, as well as the higher risk of recently-removed fuel compared to older fuel.

But dry casks, like spent fuel pools, was only supposed to be a "temporary" solution so the reactors could keep operating. For about 20 years the dream -- the nightmare -- of Yucca Mountain has been used as an excuse to keep the plants open while the waste piles up, even when reactor pools have been reracked three or more times (creating extremely hazardous conditions in case of a loss-of-water accident or sabotage). Dry casks pile up around the reactor. For 20 years any activist who said: "But what about the waste?!?" was simply told: "Yucca Mountain."

Yucca Mountain was stopped -- but NOT because of political infighting -- that's the lie the nuclear industry wants you to believe. No: It was stopped because there were more than 300 problems Nevada scientists had identified (many completely unsolvable, such as earthquake, volcano, and water intrusion problems) and several dozen more problems that California scientists had identified (including downstream radioactive pollution from underground water movement after an accident).

Another HUGE problem with Yucca Mountain, which will be at least as big a problem anywhere else, was that almost nobody in Nevada wants it, and they've fought against it vigorously for years. So too with proposed "Interim" storage sites in New Mexico and western Texas. A few local residents expect to find high-paying jobs -- mostly in management -- but other than that, nobody wants somebody else's nuclear waste.

One of the proposed temporary storage sites, as described in the agreement, was Arizona's Palo Verde Nuclear Power Plant, which is part-owned by Southern California Edison.

But the day after the announcement of the settlement, PVNPP released a statement they had obviously been holding until SCE gave them the go-ahead: They would NOT be taking anyone else's nuclear waste. Palo Verde already has storage plans for roughly 200 canisters which are currently being filled -- and plenty of room for more -- but they don't want the added liability, and probably know perfectly well they'll be stuck with the added waste forever if they take it. It's just a simple business decision for them, but puts 50 million people who live near San Onofre in danger -- or rather, keeps them in danger.

The nuclear industry as a whole absolutely opposes transferring nuclear waste from closed reactor sites to still-operating reactors (where the many risks from the operating reactors far exceed the added risk from the spent fuel, by several orders of magnitude). If it became a standard practice, dozens of reactors would shut down immediately rather than become de facto "Interim Storage Sites" for other reactors. This would of course be good for the nation for reactors to close, and would save millions of dollars in costs: For specifying new sites, for security, and for maintenance. Only closing ALL the reactors would be better. But the industry, of course, opposes it.

Meanwhile, the waste at 100 operating reactors around the country continues to accumulate. Each dry cask nuclear waste storage container is huge, but only about 1/2 inch thick of so-called "stainless" steel, weighing (together with its contents) at least two hundred thousand pounds. The containers are liable to rust, causing "stress corrosion cracking" (SCC). They cannot be inspected (or even safely approached). There are now about 2,000 dry storage canisters in America, each one vulnerable to airplane strikes (accidental OR on purpose), explosive charges, and degradation as the years go by.

The only real solution is to stop making more nuclear waste.

Any effort at neutralizing the uranium and plutonium -- possible through a patented process -- still leaves -- and in fact creates more -- fission products, which have relatively short decay periods (half-lives of about 30 years or less in most cases) compared to plutonium and uranium. These short half-lives mean the resulting waste is much more hazardous if it gets out (especially because some of it (cesium, for instance) bioaccumulates), but it is hazardous for much less time. Plutonium is hazardous for about a quarter of a million years. Most fission products are hazardous for 600 years or less.

The biggest advantage of neutralization -- besides reducing the storage time from hundreds of millennia to half a dozen centuries (still more than twice as long as the United States has existed as a country) is that it eliminates the possibility of a criticality event. Criticality events are possible with spent fuel because in a fire or accident, the fuel pellets can become rearranged to the point where radioactivity suddenly sharply increases, causing a devastating thermal explosion. It's not a nuclear bomb, but it can spread fine particles of radioactive waste over a wide area and for hundreds of miles downwind.

Moving San Onofre's waste away from the coast, away from 50,000,000 residents, sounds like a great -- and simple -- idea. But nothing in the nuclear business is what it seems, and nothing is simple.

There are numerous unsolved problems which apply to ALL sites: just moving nuclear waste from one place to another is extremely risky: Not only because of terrorism and infrastructure issues -- the roads, rails and bridges in America are in terrible shape, and the terrorists have access to drones and powerful (and extremely HOT) explosives. You cannot hide a slow-moving train or truck convoy. There are only a few roads and rail lines that can be used, so the routes are well known. The canisters they propose to use for transport are incapable of withstanding numerous accident scenarios, such as oncoming train collisions, exploding fuel trucks nearby, bridges falling on top of them or out from under them, etc. etc..

Some activists who support the NIMBY solution (Not In My Back Yard, aka: "get it out of here, I don't care where it goes") have pointed out that "the military moves nuclear fuel and waste all the time." But that doesn't tell the whole story. First of all, they can get away with far less safe procedures since they aren't regulated by the civilian Nuclear Regulatory Commission (for what it's worth).

Additionally, the military is dealing with much lighter amounts -- hundreds of pounds at a time instead of hundreds of THOUSANDS of pounds at a time. A nuclear submarine is NEVER refueled during its life and transports itself most of the way to the "final" resting place for the fuel, while nuclear aircraft carriers are refueled only once. Military nuclear fuel is U-235 enriched to nearly 20 times the level of commercial nuclear fuel (4 to 5% versus about 80%). The electricity military propulsion reactors must produce is in the tens of megawatts, far less than the 1,100 megawatts of a typical commercial reactor, so they can be much smaller. Thus, the total amount (by weight) of each military spent fuel shipment is correspondingly far less. Bombs are even smaller and more highly enriched perhaps as much as 95% U-235 and Pu-239). Nevertheless, a area in Spain is still highly contaminated with plutonium from a military plane crash in the mid 1960s, and one that accidentally fell in North Carolina in 1961 had five of six safety systems fail...one left. Another one, an H-bomb lost off the coast of Georgia in 1958, was finally found in 2004 -- but can't be moved. There have been many other incidents and near-misses with the military moving nuclear materials. Some incidents, undoubtedly, have never been made public.

Commercial nuclear waste being transported in America has ONE safety system that might remain intact: The outer steel transport container. Everything else is highly suspect and shouldn't be relied on at all. Some of the zirconium fuel cladding in every container are sure to be cracked already (each container contains nearly ten thousand fuel rods in as many as 37 fuel assemblies (or "bundles), and close to a million fuel pellets). The thin 1/2 inch inner dry storage cask cannot be inspected (especially on the INSIDE) and may be cracked after sitting in a damp, salty environment for years if not decades. The outer steel transport container is to be reused possibly hundreds of times over tens of thousands of miles. So it may already be damaged by the time an accident it was designed to survive happens.

And those accidents -- the ones the transport cask is designed to survive -- are minor compared to what might really happen. For example: Fires surrounding the cask in an accident are expected to burn for not more than about 20 minutes. A drop onto a post is expected to be from not more than about 30 feet, and the post it lands on is expected to be not less than four inches in diameter. If it falls in water, the depth is expected to be less than about 50 feet. None of these (and many other) standards are good enough. And the NRC's federal rulings on nuclear safety cannot be strengthened by individual states wanting more stringent regulations. The feds will come in and overrule any attempt by

the states to regulate safety. All they are left to regulate is who will pay for it, and in California, it's invariably the ratepayers.

This settlement deal is no deal at all, but a license for the utility to risk trillions of dollars in damages for many decades to come.

Ace Hoffman  
Carlsbad, CA

The author has been studying nuclear issues as a private citizen for more than 40 years. He has seen dozens of spent fuel proposals come and go.

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My initial reaction to the agreement:  
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This "agreement" appears to simply require Edison to spend up to but not more than \$4,000,000 looking for offsite storage, which they were doing anyway. Pursuant to CPUC approval, SCE can charge the \$4 mil to ratepayers. The key section is C1(c) which stipulates that relocation "must" result in the transfer of liability (unless SCE can come up with a "Commercially Reasonable" alternative). C1(e) further stipulates that SCE doesn't have to do anything if they can't get it paid for out of the decom fund or with fresh funds from DOE.

Section D asserts that SCE can stop looking for a place when they use up the money or when they feel like giving up the search.

In return, Plaintiffs dismiss their lawsuit, agree not to sue again (except if they feel this Agreement has been breached by SCE), nor to encourage anyone else to sue, and Plaintiffs will gleefully take \$800,000 to the bank [termed legal "expenses" by the agreement].

In other words, it's all a big load of "quap".

Ace H.

Note: "quap" is the term for nuclear waste originally coined by the great writer H. G. Wells, author of The Time Machine, The War of the Worlds, The Island of Doctor Moreau, The Invisible Man, The Shape of Things to Come, The Outline of History, The War in the Air and many other classics.

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Torgen Johnson's comments on the agreement:  
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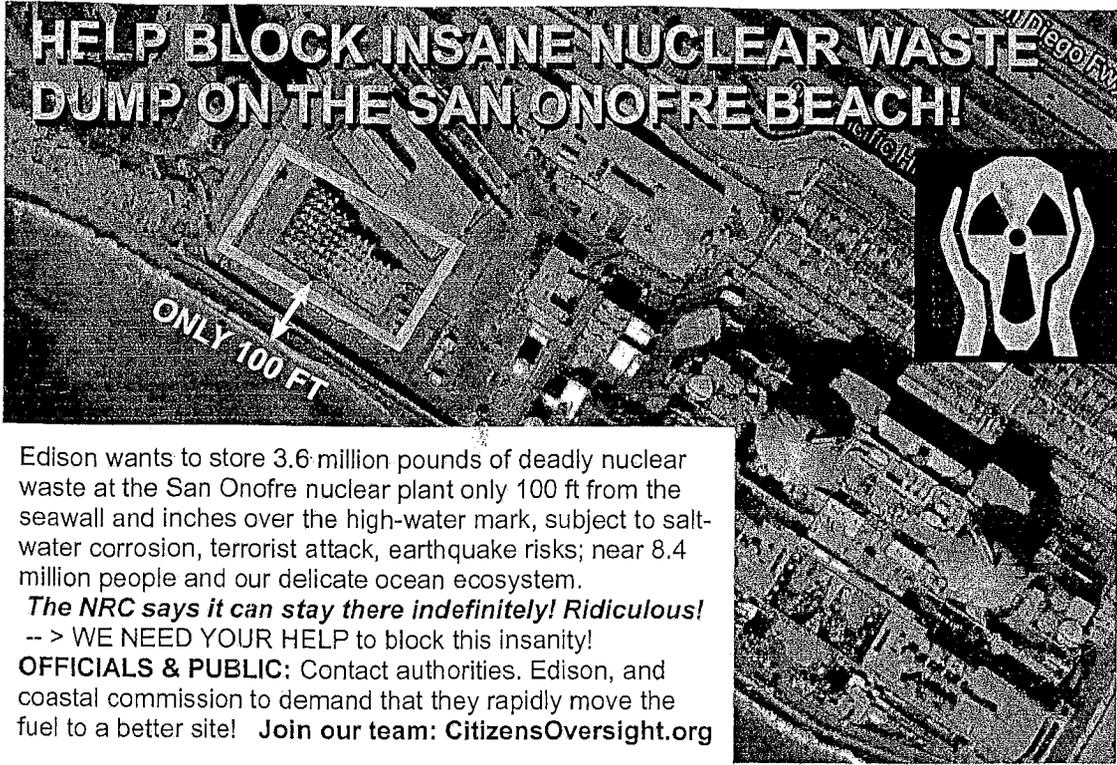
The first step is to assume a worst case (and most likely) scenario that the fuel will be stranded at San Onofre indefinitely. The fuel must therefore be moved into the most robust fuel containment possible...10" - 19.75" thick cast iron dry casks.

The second step is to imagine that the industry is going to ditch the fuel onto a smaller, politically weaker community than ours. Ethically and morally those along the transport route and those on the receiving end deserve the most robust fuel containment possible. That is not the fuel containment system that any one of us is getting at the moment. We must fight for the safer, thicker, monitored, containment casks and protect the receiving community as if they are our extended family members.

Torgen J.  
-----

\*\*\*\*\*  
\*\* Ace Hoffman, Owner & Chief Programmer, The Animated Software Co.  
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\*\* email: rhoffman@animatedsoftware.com  
\*\* To cease contact, please put "Unsubscribe-me-please" in the subject.

# HELP BLOCK INSANE NUCLEAR WASTE DUMP ON THE SAN ONOFRE BEACH!



Edison wants to store 3.6 million pounds of deadly nuclear waste at the San Onofre nuclear plant only 100 ft from the seawall and inches over the high-water mark, subject to salt-water corrosion, terrorist attack, earthquake risks; near 8.4 million people and our delicate ocean ecosystem.

**The NRC says it can stay there indefinitely! Ridiculous!**

-- > WE NEED YOUR HELP to block this insanity!

**OFFICIALS & PUBLIC:** Contact authorities, Edison, and coastal commission to demand that they rapidly move the fuel to a better site! **Join our team: CitizensOversight.org**

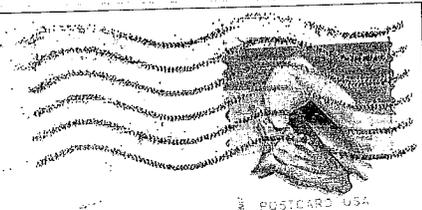
FROM

The Montgomerys

SAN DIEGO, CA 92108

email:

11 AUG 2017 11:31



**MESSAGE**

Please help us block this dangerous nuclear waste "dump" only 100 ft from the seawall and only inches over the high-water mark!

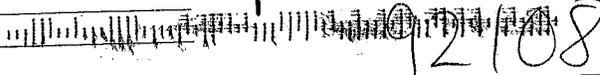
**RECEIVED**

AUG 14 2017

CALIFORNIA  
COASTAL COMMISSION  
SAN DIEGO COAST DISTRICT

7575  
Metropolitan Dr.  
Ste. 103  
San Diego, CA

92108-4401



92108

**From:** [Donna Gilmore](#)  
**To:** [Ted Quinn](#)  
**Cc:** ["Pam Patterson"](#); ["Dan Stetson"](#); ["Jerry Kern"](#); ["Toni Iseman"](#); ["Lori Donchak"](#); ["Jeff McDonald"](#); ["Rita McDonald"](#); ["Donald Mosier"](#); ["Bart Ziegler"](#); ["Ken Alex"](#); [Street, Joseph@Coastal](#); [Comments, CEQA@SLC](#); [Barker, Kevin@Energy](#); ["NRC Chairman Stephen Burns"](#); ["Allison Macfarlane"](#); ["Commissioner Jeff Baran"](#); ["Raeann Shane"](#); ["Michael Layton"](#); ["David G. Victor"](#); ["Manuel Camargo"](#); ["Maureen Brown"](#); [Tom Palmisano](#); [Rita Conn](#)  
**Subject:** RE: Nuclear power and nuclear waste issues - San Diego Tribune  
**Date:** Sunday, August 06, 2017 8:43:26 AM

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What was your role as an original builder of San Onofre?

What is your understanding of Edison's plan in case of one or more leaking spent nuclear fuel canisters?

----- Original message -----

**From:** Ted Quinn <tedquinn@cox.net>  
**Date:** 8/5/17 5:42 PM (GMT-08:00)  
**To:** 'Donna Gilmore' <donnagilmore@gmail.com>  
**Cc:** 'Pam Patterson' <Ppattersoneti@msn.com>, 'Dan Stetson' <danstetson@me.com>, 'Jerry Kern' <JKern@ci.oceanside.ca.us>, 'Toni Iseman' <tiseman2@aol.com>, 'Lori Donchak' <DonchakL@san-clemente.org>, 'Jeff McDonald' <jeff.mcdonald@utsandiego.com>, 'Rita McDonald' <rmacdon2010@gmail.com>, 'Donald Mosier' <donaldmosier44@gmail.com>, 'Bart Ziegler' <bziegler@toxco.net>, 'Ken Alex' <ken.alex@gov.ca.gov>, 'Joseph Street CCC' <joseph.street@coastal.ca.gov>, 'Cynthia Herzog' <CEQAcomments@slc.ca.gov>, 'Kevin Barker' <kevin.barker@energy.ca.gov>, 'NRC Chairman Stephen Burns' <chairman@nrc.gov>, 'Allison Macfarlane' <amacfarlane@gwu.edu>, 'Commissioner Jeff Baran' <CMRBARAN@nrc.gov>, 'Raeann Shane' <raeann.shane@nrc.gov>, 'Michael Layton' <michael.layton@nrc.gov>, 'David G. Victor' <david.victor@ucsd.edu>, 'Manuel Camargo' <manuel.camargo@sce.com>, 'Maureen Brown' <Maureen.Brown@sce.com>, tedquinn@cox.net  
**Subject:** RE: Nuclear power and nuclear waste issues - San Diego Tribune

Donna:

I am accurately quoted in the San Diego Tribune this and many other times I have written editorials for them. I have represented the San Diego American Nuclear Society Section, since the inception of the SONGS CEP, and as a nuclear engineer of 41 years, Past President of the American Nuclear Society (national), and instructor at the MIT Reactor Safety Course for over 15 years, I do support nuclear science and technology including nuclear energy that powers 99 of our nuclear plants in the U.S. and many others around the world. My goal since the inception of the CEP has been to provide unbiased facts to counter false and biased testimony or input to the CEP, which is counter to the best interests of the citizens local to San Onofre, where I have lived for over 35 years, and was an original builder of SONGS.

Ted Quinn

ANS Past President

IEC SC45A WGA9 Convenor

President, Technology Resources

<http://www.technology-resources.com/>

(949) 632-1369

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**From:** Donna Gilmore [mailto:donnagilmore@gmail.com]

**Sent:** Saturday, August 5, 2017 8:05 AM

**To:** Ted Quinn <tedquinn@cox.net>

**Cc:** Pam Patterson <Ppattersoneti@msn.com>; Dan Stetson <danstetson@me.com>; Jerry Kern <JKern@ci.oceanside.ca.us>; Toni Iseman <tiseman2@aol.com>; Lori Donchak <DonchakL@san-clemente.org>; Jeff McDonald <jeff.mcdonald@utsandiego.com>; Rita McDonald <rmacdon2010@gmail.com>; Donald Mosier <donaldmosier44@gmail.com>; Bart Ziegler <bziegler@toxco.net>; Ken Alex <ken.alex@gov.ca.gov>; Joseph Street CCC <joseph.street@coastal.ca.gov>; Cynthia Herzog <CEQAcomments@slc.ca.gov>; Kevin Barker <kevin.barker@energy.ca.gov>; NRC Chairman Stephen Burns <chairman@nrc.gov>; Allison Macfarlane <amacfarlane@gwu.edu>; Commissioner Jeff Baran <CMRBARAN@nrc.gov>; Raeann Shane <raeann.shane@nrc.gov>; Michael Layton <michael.layton@nrc.gov>

**Subject:** Nuclear power and nuclear waste issues - San Diego Tribune

Ted, are you accurately quoted in this San Diego Tribune article, stating you support new nuclear reactors? If so, how do you address the problems I've outlined below in my comments to the Tribune. As you are a member of Southern California Edison's Community Engagement Panel, it's unclear who you are representing on this panel.

<http://www.sandiegouniontribune.com/business/sd-fi-nuclear-woes-20170803-story.html>

I suggest the Tribune give us ongoing updates on what is happening at Fukushima in Japan. With 3 on-going nuclear reactor meltdowns dumping lethal radioactive water into our Pacific Ocean and an inability to solve this, people need to be reminded that the nuclear industry has no plan for failure. Blue fin tuna caught in San Diego were found to have Cesium-134 from Japan.

And people need to know **each** thin-wall stainless steel canister at San Onofre contains about as much lethal radioactive Cesium-137 (and other radionuclides) as

was released from the Chernobyl nuclear disaster.

And Edison has no approved plan in place to deal with leaking and potentially exploding canisters. The President of Holtec admitted at an Edison meeting that even a microscopic through-wall crack will release millions of curies of radionuclides into the environment and it's not feasible to repair cracks in canisters loaded with this highly radioactive waste. Details at [SanOnofreSafety.org](http://SanOnofreSafety.org)

Promises to move this waste do not address these issues: NRC safety regs do not allow transport of even partially cracked canisters and the NRC admits no canister has been inspected for cracks since they have no method to find cracks in canisters filled with radioactive waste. The NRC is still studying whether train vibrations will cause the high burnup fuel assemblies in these canisters to become damaged.

Recommending more nuclear power and more nuclear waste by ignoring these realities is unsubstantiated hope and ignores the substantial proof nuclear power is a bad idea.

Those claiming we need it may not know these nuclear plants are keeping renewable energy from coming online. These inflexible plants are not designed to be easily turned off and are not designed to just reduce power output.

NUCLEAR WASTE IS NOT SAFELY STORED IN THE U.S. Solve that problem rather than wasting time, money and talent creating more lethal radioactive waste.

Most of the world uses thick wall casks that can be inspected, repaired, maintained and monitored to PREVENT leaks. They house them in buildings for additional environmental and security protection. Edison refused to require these basic safety requirements in their bid for waste storage containers. You wouldn't buy a car that didn't meet these basic safety requirements.

Edison needs to stop their plan for more thin-wall canisters and deal with the 51 canisters that may already have started to crack. And there is no seismic rating for even partially cracked canisters.

Thick casks don't have all these problems. Thin canisters are only 1/2" to 5/8" thick. Thick casks are 10" to 19 3/4" thick. It's just common sense. You don't need to be a nuclear engineer to understand this.

Donna Gilmore  
[SanOnofreSafety.org](http://SanOnofreSafety.org)  
949-204-7794  
[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)

**From:** [Marni Magda](#)  
**To:** [Bochco, Dayna@Coastal](#); [Street, Joseph@Coastal](#)  
**Subject:** Correction on Memorandum about SONGS previously sent from Marni Magda  
**Date:** Tuesday, August 01, 2017 9:01:51 AM  
**Attachments:** [CCC Reverse SONGS PSDAR to remove 103 canisters june 7 2017.docx](#)

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Commissioner Bochco and Joe Street,

Attached is a correction to the memorandum "SONGS Decommissioning Post Shut Down Action Report (PSDAR) Plan Must Change"

Thank you for your time on this crucial issue about SONGS.

Best Regards,

Marni Magda

## **SONGS Decommissioning Post Shut Down Action Report (PSDAR) Plan Must Change**

### **WE MUST REVERSE THE SONGS PSDAR AND REMOVE ALL 73 DRY CANISTERS FROM THE LOWER ISFSI BEFORE THE REACTOR DOMES ARE BLOWN UP AND SECURITY IS REDUCED**

The California Coastal Commission and the California State Lands Commission will be asked by SCE for a permit to begin to dismantle the current reactor domes, cooling pool and plant infrastructure of concrete and steel once the spent fuel cooling pools are emptied around June 2019.

The California Coastal Commission and the State Lands Commission must deny those permits to begin destruction of any buildings on the ocean side of SONGS until the 103 dry canisters, both Areva and Holtec, are moved to the Monitored Retrievable Storage (MRS) in New Mexico expected to be ready for 500 dry canisters by 2022. The lower Independent Spent Fuel Storage Installation (ISFSI) that is 36 yards from the ocean and next to the road would then be empty.

Instead of tearing down buildings, building a road to remove the domes and reducing security, Southern California Edison (SCE) should focus on the tasks needed to move 103 dry canisters by 2022. These tasks include: 1) NRC approval for transportation of the 73 Holtec dry canisters; 2) Application to the DOE to be on the first queue for transporting stranded dry canisters to consent-based Holtec MRS in New Mexico; 3) Ordering the SONGS transport casks that need a two year lead time to be built to move the 103 dry canisters to the border of SONGS for DOE acceptance; and 4) Building the road and rail spurs needed to clear the dry canisters from the lower ISFSI and secure the upper ISFSI for the 20 dry canisters that must wait for transportation until 2030.

This would delay blowing up the domes and the destruction of the spent fuel pools by up to 3 years, 2022 to 2025.

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The problem SCE faced creating its decommissioning plan was that the Federal Government had promised to have the DOE remove Spent Nuclear Fuel (SNF) from commercial reactors by 1998 but failed to create any place to take it. SCE and Energy Solutions thus created a plan at SONGS to take the buildings down and leave the dry storage canisters until the government provided a place to take them. SCE reasoned this approach would be acceptable because the Nuclear Regulatory Commission (NRC) in NUREG 2157 GEIS stated that no danger existed at any reactors sites even if the dry canisters remained on site for 300 years.

In June 2013 the first version of the PSDAR was presented to the public for comment, called Revision 1 PSDAR. The plan had been drafted by Energy Solutions and SCE. Energy Solutions is the Salt Lake City-based nuclear waste firm that owns land in 40 states where it buries low level radiated materials. They have been hired to remove all of the structures at SONGS. Aspen Environmental has been hired by the State Lands Commission (SLC) to provide advice for the SLC

Environmental Impact Report (EIR) for California Environmental Quality Act (CEQA) that will need to permit the deconstruction of the domes and building on the ocean side of SONGS and will soon be ready for public comments.

SCE, with Energy Solutions advice, decided in 2013 what kind of decommissioning system was best for Units 2 and 3 and the partially decommissioned unit 1. They presented their plan with cost estimates and dates for each phase of the Decommissioning process. The public made comments.

When the next version of the PSDAR was presented in August 2014, the 11 pages of the initial Irradiated Fuel Management Plan (IFMP) had been eliminated, with promises that the Department of Energy (DOE), the Nuclear Regulatory Commission (NRC) and Southern California Edison (SCE) were working on a system to keep SONGS spent nuclear fuel safely on site until the DOE would take it. This SONGS PSDAR provided for removal of all of the buildings, domes, spent fuel pools, parking lots, roads and rails but left the Spent Nuclear Fuel (SNF) in dry canisters at San Onofre on the cement ISFSI as the last items to be removed to return the site back to Camp Pendleton set around 2050.

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New research shows the dangers of earthquakes and other environmental hazards are greater than understood before. The possible corrosion cracking of dry canisters makes leaving them in marine environments a greater risk.

The nation and the nuclear industry facing more decommissioning reactor sites have become aware of the need for a national interim storage solution as well as a final depository for the nation's SNF.

Many of the nation's SNF dry canisters must be monitored above ground for 20 to 60 years. They can be transported to a remote temporary storage facility by truck or rail for that above-ground waiting period, but legislation is necessary to allow the Department of Energy (DOE) to send commercial SNF to an interim site. Human error, environmental and terrorist risks demand a safer means of monitoring the nation's abandoned SNF away from sites in densely populated areas such as SONGS.

The US Navy safely ships defense SNF across the country using a government planning system and emergency training for its routes. The NRC in its document NUREG 0725 details the safe transport of commercial SNF across the country beginning in 1979 on main-line railroads across the country. The spent fuel at SONGS can and should be transported to an interim storage site.

### **THE SHIMKUS BILL HR 3053 “THE NUCLEAR WASTE POLICY AMENDMENTS ACT OF 2017” MAKES MOVING THE SNF FROM SONGS A REALITY**

The DOE cannot by law send commercial SNF to interim storage until the Nuclear Act of 1982 is amended. For the first time in 35 years a bill HR 3053 “The Nuclear Waste Policy Amendments Act of 2017” was introduced by Congress member Shimkus and would allow commercial SNF like that at SONGS to be moved to an interim storage site. The bill is bipartisan, is backed by many Republicans and Democrats, and we should actively support it.

The bill addresses land issues specific to the 147,000 acres of land in Nye County, Nevada known as Yucca Mountain as a final repository, giving the Secretary of the Interior rather than the state of Nevada jurisdiction over issues of access, water and minerals for that land and forces an evaluation of Yucca to determine if it can be a final repository for SNF.

The bill also makes it legal for the DOE to contract to move commercial SNF to Monitored Retrievable Storage (MRS) from NRC licensed facilities for the period the dry canisters must be monitored above ground.

The taxpayer is responsible for all of the storage costs of the nation’s 79,000 tons of SNF. This bill uses the \$36 billion accumulated in the Nuclear Waste Fund to pay for consent –based consolidated interim storage of the SNF. The governor of the state in which the fuel is to be stored must consent as well the local government or tribal entity where the facility will be. Currently all nuclear facilities sue the federal government to repay their costs for storing it on site, wasting lawyers’ fee and using a government sludge fund to pay.

HR 3053 makes possible a new time table for moving SNF from San Onofre. The NRC is in the process of approving a consent-based license in New Mexico to store SNF dry canisters on an interim basis once called Consolidated Interim Storage (CIS), now referred to as Monitored Retrievable Storage (MRS). The governor of New Mexico has given approval and the local entity that owns the land Eddy-Lea Energy Alliance (ELEA) wants the facility that is set to monitor 10,000 dry storage canisters in partnership with Holtec International. The ELEA is composed of the cities of Carlsbad and Hobbs and the counties of Eddy and Lea. The community purchased the 1000 acres and has strong local support of the MRS facility. This New Mexico MRS facility is expected to be ready for 500 dry canisters in its first phase of construction by 2022. The Shimkus bill will provide the DOE with the authority and finances to begin shipping dry canisters of stranded SNF by 2022.

## **Tasks Ahead**

We must continue to press for the legislation needed in the House and the Senate to make MRS of the nation's SNF a reality and to create a final depository as well.

The reality of interim storage and Holtec's connection with ELEA where the stakeholders want a consent-based MRS facility has changed how we must look at the order in which SCE proceeds with decommissioning.

We must ask SCE to focus on the tasks needed to move the dry canisters rather than the system to dismantle the plant.

The PSDAR must be reversed. We have a place to take the fuel. It must be moved first before the domes are exploded and security is reduced. The loads of trucks hauling steel girders and concrete domes will take years and the shaking of the earth creating risks that the ISFSI and dry canisters could be damaged. Removing the fuel first is safer.

A road to take the 103 canisters out of SONGS can't be built at the same time as the deconstruction trucks are hauling tons of steel and concrete up the bluff. Therefore we must reverse the order of the PSDAR to first build the road and complex system of cranes and casks that will be needed to move the 103 Holtec and Areva canisters to the border of SONGS where the DOE can accept them starting in 2022.

It is also critical that the DOE accept, as promised, stranded fuel before oldest fuel as its priority. They must move quickly to build the 3 transport rail casks and the escort rail car that will take the stranded fuel from the border of a closed reactor site to New Mexico.

We must continue to educate the public that SNF is dangerous, but it is successfully moved by rail all the time. States are advised and the emergency training is already in place. At decommissioning sites the Price-Anderson guarantee of \$12 billion from the nuclear industry if an accident occurs is no longer in effect. We can't afford to leave the SNF on the ocean at SONGS for even a decade let alone 300 years.

Though the CCC and the SLC do not have authority over concerns about radiation, they clearly have jurisdiction to request a safer order for removal of dry canisters that no one wants to have compromised by explosions where unknown future problems could have canisters adrift in the ocean. The nation is moving finally to correct a 35 year quagmire of SNF inaction. We must all join forces to get SONGS spent nuclear fuel moved.

Correction: July 31, 2017 This memorandum has been revised to reflect the following correction of an earlier version that misidentified the company advising the SLC on it EIR for CEQA as Energy Solutions when in fact it is Aspen Environmental.

Respectfully submitted by Marni Magda, concerned citizen and resident of Laguna Beach.

marnimagda@gmail.com

**From:** [Marni Magda](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal); [Marni Magda](#)  
**Subject:** SONGS PSDAR  
**Date:** Sunday, July 23, 2017 7:03:33 PM  
**Attachments:** [CCC Reverse SONGS PSDAR to remove 103 canisters june 7 2017.docx](#)

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Hi Joe,

The attached is my personal understandings of the issues I address about SONGS and interim storage and the Shimkus bill as best I can understand them. These ideas are mine alone. They in no way represent the Sierra Club or any other organization to which I belong.

With that said, I hope you will get these ideas to your staff and to Commissioner Dayna Bochco. I would like to see comprehensive questions answered when SCE speaks to the Commission. And I hope many of you will get an on site visit.

If it is better for me to send this directly to Commissioner Bochco, please let me know.

Best wishes,

Marni Magda

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Respectfully submitted by Marni Magda, concerned citizen and resident of Laguna Beach.

marnimagda@gmail.com

***Received July 13 -- 17, 2017***

**40 copies of the following letter** (example attached):

Dear Commissioners:

I live in Southern California and do not want San Onofre used as a nuclear waste storage site.

Rather than simply putting radioactive material in drums with a 25-year life span, please hold it in the controlled environment of the cooled storage onsite.

Once a final storage site is located, I ask that you safely move the waste there and get it away from 8.5 million people.

Thank you,

*Received July 13 from:*

---

Georges M. Argova  
421 Santa Dominga  
Solana Beach, CA 92075

Carrie Targhetta  
2305 Rancho Del Oro Rd. #24  
Oceanside, CA 92056

Aislinn R. Cunningham  
3560 Ames Pl.  
Carlsbad, CA 92010

Elizabeth Warren  
789 Aldea Dr.  
Oceanside, CA 92057

Kenneth A. Dalpe  
5437 Old Ranch Rd.  
Oceanside, CA 92057

Wendy A. Weisel-Bosworth  
1774 Jasmine Way  
Oceanside, CA 92054

Dwight E. Johnson  
603 Seagaze Dr. #830  
Oceanside, CA 92054

*Received July 17 from:*

---

Raj Atti  
4594 Leathers St.  
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Francine Busby  
2235 Ruddy Duck Ct.  
Cardiff, CA 92007

Molly Boyd  
3962 Hamilton St. #38  
San Diego, CA 92104

Angela Deegan  
3885 Bass St.  
La Mesa, CA

Valerie A. Bruce  
7664 Meadowbrook Ct.  
San Diego, CA 92114

Ken Drucker  
5162 Central Ave.  
Bonita, CA 91708

Dawn Douglas  
13190 Carousel Lane  
Del Mar, CA 92014

Lawrence Emerson  
1344 Manchester St.  
National City, CA 91450

Jim Hamilton  
502 Portico Dr.  
Oceanside, CA

David Harris  
8815 Mariposa St.  
La Mesa, CA 91941

Kaaren H. Kerlin  
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San Diego, CA 92130

Kenneth G. Kubaryeh  
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Del Mar, CA 92014

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San Diego, CA 92115

Michael Levin  
550 W. Vista Way #104  
Vista, CA 92083

Diana Maldonado  
1760 W. Knapp Dr.  
Vista, CA

Susan Mayo  
544 Via del la Valle #E  
Solana Beach, CA 92075

Maria McEneany  
Paul McEneany  
P.O. Box 2631  
Rancho Santa Fe, CA 92067

Grainne McGuire  
#147 9084 Gramercy Dr.  
San Diego, CA 92123

Cara Nager  
5069 Saratoga Ave #1  
San Diego, CA 92107

Ryan O'Connor  
4945 W. Mtn. View Dr.  
San Diego, CA

Isis Rodriguez  
1550 Goldfield St. #14  
San Diego, CA 92110

Mary Servin  
3760 North Way #80A  
Oceanside, CA

Tyson P. Siegalie  
9244 Regents Rd. Apt. H  
La Jolla, CA 92037

Phoebe S. Telsler  
159 Mexicali Ct.  
Solana Beach, CA 92075

Susanne Wolfsheimer  
P.O. Box 3077  
Rancho Santa Fe, CA 92067

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Thank you.

Signature



Print Name

ELIZABETH WARREN

Mailing Address

789 ALDEN DR.

City

EVANSIDE CA 92057

2017

Received  
7/11/17

## UNITED STATES NUCLEAR WASTE DISPOSAL SOLUTIONS

A few suggestions on what to do with the Nation's nuclear waste:

1. **Recycle** all nuclear waste to reduce the volume. Other countries do just that. The current Volume of our waste needs to be reduced.

2. Waste that cannot be recycled will be placed in a **Repository**. We have one. *Yucca mt*

3. Waste will be packaged, inspected regularly, and re-packaged until science finds a safer way to leave it alone. It will not be "buried".

Solutions to this problem have been around for many years. It only costs money.

Thank you.

Attached: The Heritage Foundation Commentary

*Get the Government on Board*



COMMENTARY Environment

## **Recycling Nuclear Fuel: The French Do It, Why Can't Ours?**

Dec 28th, 2007, 3 min read

Jack Spencer

Vice President, the Institute for Economic Freedom

Jack Spencer oversees research as Vice President for the Institute for Economic Freedom and Opportunity.

What if the government allowed you to burn only 25 percent of every tank of gas?  
Or if Washington made you pour half of every gallon of milk down the drain?

What if lawmakers forced us to bury 95 percent of our energy resources?

That is exactly what Washington does when it comes to safe, affordable and CO<sub>2</sub>-free nuclear energy. Indeed, 95 percent of the used fuel from America's 104 power reactors, which provide about 20 percent of the nation's electricity, could be recycled for future use.

To create power, reactor fuel must contain 3-5 percent burnable uranium. Once the burnable uranium falls below that level, the fuel must be replaced. But this "spent" fuel generally retains about 95 percent of the uranium it started with, and that

uranium can be recycled.

Over the past four decades, America's reactors have produced about 56,000 tons of used fuel. That "waste" contains roughly enough energy to power every U.S. household for 12 years. And it's just sitting there, piling up at power plant storage facilities. Talk about waste!

The sad thing is, the United States developed the technology to recapture that energy decades ago, then barred its commercial use in 1977. We have practiced a virtual moratorium ever since.

Other countries have not taken such a backward approach to nuclear power. France, whose 59 reactors generate 80 percent of its electricity, has safely recycled nuclear fuel for decades. They turned to nuclear power in the 1970s to limit their dependence on foreign energy. And, from the beginning, they made recycling used fuel central to their program.

Upon its removal from French reactors, used fuel is packed in containers and safely shipped via train and road to a facility in La Hague. There, the energy producing uranium and plutonium are removed and separated from the other waste and made into new fuel that can be used again. The entire process adds about 6 percent in costs for the French.

Anti-nuclear fear mongering has proved baseless. The French have recycled fuel like this for 30 years without incident: no terrorist attack, no bad guys stealing uranium, no contribution toward nuclear weapons proliferation, and no accidental explosions.

France meets all of its recycling needs with one facility. Indeed, domestic French reprocessing only takes about half of La Hague's capacity. The other half is used to recycle other countries' spent nuclear fuel.

Since beginning operations, France's La Hague plant has safely processed over 23,000 tons of used fuel--enough to power France for fourteen years.

Their success has sparked plenty of interest abroad. The French company AREVA

has already helped Japan with its reprocessing facility and is currently looking at the feasibility of building a similar plant in China.

The British, Japanese, Indians, and Russians all engage in some level of reprocessing.

Of course, there is still waste involved. But recycling produces much lower volumes of highly radioactive waste, and the French deal with it effectively--placing some waste in short-term, interim storage or preparing the rest for long-term storage in their version of Yucca Mountain.

All is not perfect in France. They are still working to open a permanent geologic storage facility. But the critical issue is that they have an organization to handle used nuclear fuel that allows their program to advance without being held hostage to the politics of geologic storage.

If the United States is serious about reducing CO2 and energy dependence, it must get serious about nuclear power and begin recycling used nuclear fuel.

A viable reprocessing capability not only would give the United States a valuable energy resource, it would reduce the amount of material going to Yucca Mountain. The U.S. has already produced enough waste to nearly fill Yucca's legal limit of 70,000 metric tons--subsequent studies estimate that its actual capacity is about double that amount and some believe that it is even greater.

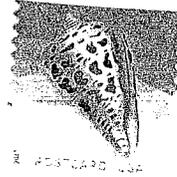
It would also put the United States back on the map as a leader in commercial nuclear technology, which today it is not.

Nuclear fuel reprocessing is a safe activity that should be part of America's nuclear energy program. It can be affordable and is technologically feasible. The French are proving that on a daily basis. The question is: Why can't ours?

Jack Spencer is a research fellow in the Thomas A. Roe Institute for Economic Policy Studies.

First appeared in FoxNews.com

Susan Saigo  
58 Echo Run  
Dubuque, CA 92614



California Coastal Commission  
200 Ocean Gate, Fl 10, Ste 1000  
San Diego Beach, CA 90802  
**RECEIVED**  
South Coast Region

JUL 10 2017

CALIFORNIA  
COASTAL COMMISSION

Please Revoke the San Onofre  
Nuclear Waste Storage Permit.  
The Coastal Commission special  
conditions must be met now  
not in 20 yrs. Don't issue  
Permit until all conditions  
are met. Note: Coastal  
Commission's requirements  
can be met with thick casks.  
Susan Saigo

**From:** [Donna Gilmore](#)  
**To:** [taketwoshow@scpr.org](mailto:taketwoshow@scpr.org)  
**Cc:** [David G. Victor](#); [Tom Palmisano](#); [Street.Joseph@Coastal](mailto:Street.Joseph@Coastal); [Decommission San Onofre](#); [NFC Summit Group](#); [Torgen Johnson](#)  
**Subject:** David Victor on San Onofre KPPC 7/7/2017  
**Date:** Friday, July 07, 2017 1:15:19 PM

---

Thanks for raising awareness on San Onofre nuclear waste and our country's urgent short and long-term nuclear waste storage problems on your July 7th radio broadcast.

David Victor is right that we have a problem. However, he gave you some misinformation. I am cc'ing him, Tom Palmisano (Edison) and a Coastal Commission staff person on this email.

Victor said the San Onofre seawall provides protection. In Edison's application for the Coastal Commission permit to install more nuclear waste canisters, Edison stated they are not taking any credit for the seawall functioning, since they have not been maintaining it. Edison has no plans to repair the seawall and they promised the Coastal Commission they would not repair it.

Regarding Victor's statement the current system will last for decades, Nuclear Regulatory Commission (NRC) data does not support this. The NRC admits and the Coastal Commission addressed in their staff report that the thin-wall stainless steel canisters cannot currently be inspected and are subject to cracking from the marine environment.

Canisters with even partial cracks cannot be transported per NRC safety regulations. The NRC has not approved Holtec's high burnup spent fuel transport cask because Holtec cannot verify there are no cracks in the canisters and no damage to the fuel assemblies.

The NRC is still studying whether just normal train vibrations will cause the high burnup fuel assemblies to fail. Since they will likely need to travel by rail through LA, this should be of great concern to your listeners.

Each canister contains about as much lethal highly radioactive Cesium-137 as was released from the Chernobyl nuclear disaster and Edison has no adequate plan to deal with leaking and potentially exploding canisters.

NRC documents state once a crack starts it can continue to grow through the wall in about 16 years.

According to Holtec canister President, Kris Singh's statements at a previous Community Engagement Panel meeting, even a microscopic through-wall crack will release millions of curies of radionuclides into the environment and even if you could find a way to repair them, it's not feasible to repair them without introducing another area for cracking.

The Coastal Commission gave Edison 20 years to solve these problems, but NRC and other scientific data shows it's not feasible to solve these problems with Edison's use of these poorly designed canisters and below ground concrete system.

Holtec only offers a 10 year warranty on the concrete structure. Canister warranty is 25 years, but that is void if the concrete structure fails after 10 years. None of these warranties provide coverage for the consequences of radioactive leaks.

Shimkus bill HR 3053 for moving and storing the waste not only ignores these problems, but removes critical safety requirements from the Nuclear Waste Policy Act. The bill also removes Congressional, state and public oversight and weakens existing State, local and federal water rights and other rights.

The recent House Energy and Commerce Committee voted 49 to 4 to approve this bill. I watched all their hearing and markup sessions. No one mentioned any of these safety issues or that the bill removed critical safe storage and transport requirements.

Shimkus plans to bring the bill up for a vote soon. **It may fly through the house unless people contact their elected officials and educate them about the problems with this bill.** Congress should demand the NRC do their job to protect our safety and the environment.

The Sierra Club along with 48 other organizations oppose the Shimkus bill.

I spoke to one of the Shimkus staffers working on the bill. When I raised concerns about removing safety requirements, he said they were assuming the NRC would assure storage and transport safety. When I explained why the NRC is not doing that and that they approve containers that can have short-term cracks and leaks, and cannot be inspected (inside or out), maintained, repaired or monitored to prevent leaks, he said that's not his (Shimkus) problem.

The California Coastal Commission should revoke the San Onofre storage permit because of evidence Edison will not be able to meet required Coastal Commission Special Conditions in 20 years or ever with the inferior Holtec storage system. Special conditions include ability to maintain and transport this waste.

The existing 51 San Onofre thin-wall canisters were not discussed in the Coastal Commission storage permit meeting. Edison began loading those Areva-TN NUHOMS canisters in 2003. We have no idea how many cracks they may have or how far those cracks have traveled through the wall of the canisters.

Other countries have used thick-wall metal casks for decades for both storage and transport. They do not have the thin-wall canister system problems, but Edison refused to seriously consider them. These dual-purpose casks meet all Coastal Commission special requirements.

Edison has said these thick-wall casks are not approved for San Onofre fuel. However, they don't mention it's typical for vendors to request this from the NRC after

they have a customer. In fact, Holtec and Areva-TN did this in order to obtain the San Onofre contract. Fukushima thick-wall casks survived the Tsunami and Great 9.0 Earthquake of 2011.

A Coastal Commission meeting will address the San Onofre permit in Malibu, August 9th, 10th or 11th. Location is:

**King Gillette Ranch Auditorium**

26800 Mulholland Hwy  
Calabasas, CA 91302

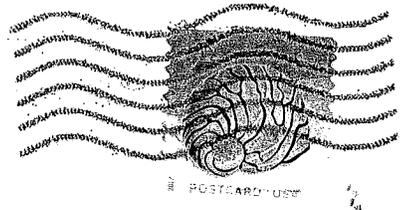
This Coastal Commission link doesn't specify a date or agenda details yet.

<https://www.coastal.ca.gov/meetings/mtgdates.html>

Go to [SanOnofreSafety.org](http://SanOnofreSafety.org) for details on these issues.

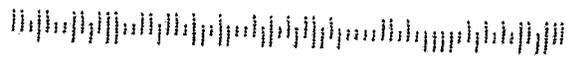
Donna Gilmore  
[SanOnofreSafety.org](http://SanOnofreSafety.org)  
949-204-7794  
[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)

Sara Murrieta  
2620 W. Seeger #1  
Santa Ana, CA 92704-6360  
03 JUL 2017 PM 2 L



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California Coastal Commission  
200 OceanGate, Fl 10, Ste 1000  
Long Beach, CA 90802



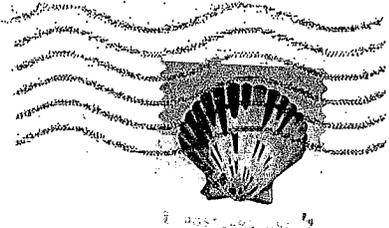
California Coastal Commission:

San Onofre has been a threat for decades.

The CA Coastal Commission must insure that a permanent solution be strictly met for the nuclear waste now. Edison must follow the safety standards that are available. We have the tragedy and the solutions followed at Fukushima as an example and model.

Sara Murrieta

Susan Dwyer  
58 Echo Road  
Irvine, CA 92614

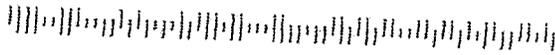


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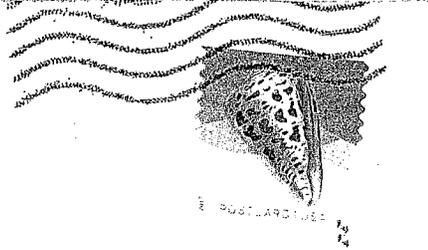
CALIFORNIA  
COASTAL COMMISSION

California Coastal Commission  
200 OceanGate, Fl 10, Ste 1000  
Long Beach, CA 90802



Please Prohibit The Use of  
Thin Nuclear Waste Canisters  
as they cannot be inspected  
or repaired should cracks  
appear. They are a huge  
public safety hazard as cracks  
release millions of curies of  
radiation into the environment.  
Susan Dwyer

Felicity Figueroa  
36 Blazing Star  
Irvine CA 92604  
JUL 14 2017 PM 9 L



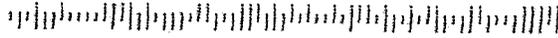
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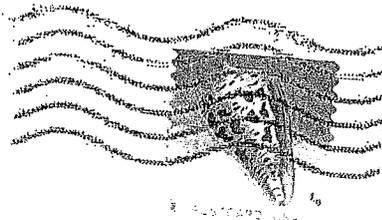
901650



Revoke Nuclear Waste Storage  
Special permit for San Onofre!  
Special conditions must be met now!  
The thin canisters can crack & once  
they do, the cracks can penetrate  
hot canister walls in 5 years or  
less, THIS IS A HUGE PUBLIC  
SAFETY ISSUE! Many may  
already have cracks & there is  
no way to tell. That's why I'm  
asking that you revoke their  
nuclear waste storage permit  
immediately! Thank you -  
Felicity Figueroa

31812 Pascoke Branca  
SJC CA 92675

03 JUL 2017 PM 9 L



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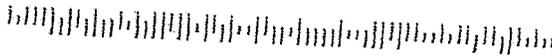
South Coast Region

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California Coastal Commission  
200 Oceangate, Fl 10, Ste 1000  
Long Beach, CA 90802

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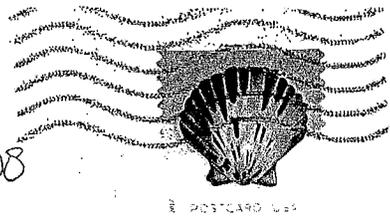
Dear Coastal Commission,  
It is imperative that you  
immediately ① REVOKE the  
nuclear waste storage permits  
② make sure cooling pools are  
maintained and ③ Edison  
uses thick walled  
canisters.

Carol J. I  
31812 Pascoke Branca  
SJC, CA 92675

Libby Frolichman  
10687 Diddy Circle  
Fountain Valley, CA 92708

SANTA ANA, CA 926

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COASTAL COMMISSION

California Coastal Commission  
200 Oceangate, Fl 10, Ste 1000  
Long Beach, CA 90802

491950



Please revoke the Nuclear  
Waste Storage Permit for San Onofre.  
The special conditions  
must be met NAW, not  
deferred 20 years. The Holtec  
Storage canisters are not  
safe and cannot be inspected,  
repaired, maintained or adequately  
monitored. Libby Frolichman

Dear Commissioners:

I live in Southern California and do not want San Onofre used as a nuclear waste storage site.

Rather than simply putting radioactive material in drums with a 25-year life span, please hold it in the controlled environment of the cooled storage onsite.

Once a final storage site is located, I ask that you safely move the waste there and get it away from 8.5 million people.

Thank you.



Signature

MARSHA PRINCE

Print Name

631 SOLANA GLEN CT

Mailing Address

SOLANA BEACH CA 92075

City

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CALIFORNIA  
COASTAL COMMISSION



The CA Coastal Commission (CCC) approved a permit to build a nuclear waste storage facility (ISFSI) only 100 ft from the fragile ocean, inches over the high-water mark, and near a 7.4 mag fault. Citizens' Oversight filed a lawsuit and now we are in settlement negotiations. Public outcry is essential to help stop this!!

**HIGH LEVEL WASTE DEADLY** for 250,000+ years  
**TERRORIST TARGET:** Near 8.4 million residents, a ten-lane freeway, and active railroad line, a prime terrorist target for dirty bomb attack.

**WRONG PLACE:** There are many options that have not been explored!  
**MAY NEVER MOVE:** The permit by the CCC is for 20 years. But they know it will be in place for at least 35 years, and they admit it may remain for many decades after that, potentially impacting the coastal zone. The fragile bluffs are likely to erode, possibly releasing radioactivity into the ocean.

**CANISTERS TOO BIG, HOT, THIN:** Too hot and large to be compatible with any future geologic repository, and too thin to resist ocean-air corrosion.

**NO INSPECTIONS:** No requirement for inspections for 19.5 years. Inspection technology does not yet exist. Good luck getting them out!

**NEWLY DISCOVERED FAULTS:** Newport-Inglewood/Rose Canyon fault is capable of a (very strong) 7.4 magnitude earthquake just a few km off shore. Edison says facility is rated for a 7.5. No Margin!

**PROCESS TOO QUICK:** Why do we allow for-profit corporations to decide what to do based on stock market valuation rather than the public good? CCC meeting was only 90 minutes and allowed opponents only two minutes each to make their case.

**BACKROOM MEETINGS:** To top it off, most of the CCC commissioners had improper private meetings with the applicant, Southern California Edison. Wrong again!

**CITIZENS' OVERSIGHT**

--->> **WE MUST STOP THIS INSANITY!** <<---

**VISIT:** <http://CitizensOversight.org/StopNukeDump>

**SIGNUP:** <http://CitizensOversight.org/signup>

Please mail signed letter below to:

California Coastal Commission  
45 Fremont St., Suite 2000  
San Francisco, CA 95227

July 3, 2017

California Coastal Commission  
200 Oceangate, Fl 10, Ste 1000  
Long Beach, CA 90802

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South Coast Region

JUL 05 2017

**CALIFORNIA  
COASTAL COMMISSION**

RE: San Onofre nuclear waste disposal

Members of the Commission,

I am greatly concerned with the current method of storing nuclear waste at the closed San Onofre nuclear power plant. The 5/8" thick steel canisters currently being utilized and stored on location are not adequate to guard against corrosion, cracking and the subsequent release of radiation. In fact, the manufacturer only warrants these canisters for 25 years.

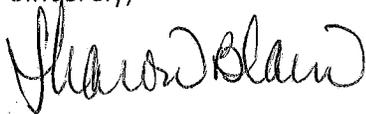
In light of the fact that we currently have no long-term storage facility for nuclear waste anywhere in the nation, it seems irresponsible to store the San Onofre waste on site in short-term containers. At a minimum, spent fuel rods should be stored in the 10" thick canisters currently in use by most other countries.

Also, since cooling ponds will be required to effect the transfer of spent rods from their current canisters to the thicker, long-term canisters, Southern California Edison should not be allowed to destroy these pools.

**Please consider the safety of area residents and revoke SCE's nuclear waste storage permit.**

Thank you for your attention to this very important matter.

Sincerely,



Sharon Blain  
1 Dove St  
Aliso Viejo, CA 92656  
sharonblain@cox.net

**From:** [Donna Gilmore](#)  
**To:** [Ken Alex](#); [Street, Joseph@Coastal](mailto:Street.Joseph@Coastal); [Barker, Kevin@Energy](mailto:Barker, Kevin@Energy); [Heather Hutt](#); [Dave Freeman](#)  
**Cc:** [Judy E. Jones](#)  
**Subject:** Re: URGENT H.R. 3053 Preempts state water rights. Hearing Wed. Shimkus"s (R-IL) dangerously bad radioactive waste bill! Act right away!  
**Date:** Tuesday, June 27, 2017 6:09:55 PM

---

Here is an updated analysis of this bill.

<https://sanonofresafety.files.wordpress.com/2015/10/commentshr3053nwpa2017-06-23final.pdf>

A total of 50 local and nation groups signed on to the following letter opposing the bill.

<https://sanonofresafety.files.wordpress.com/2015/10/hr-3053-community-opposition-letter.pdf>

Link to House markup vote, 7 am Pacific Time

<https://energycommerce.house.gov/hearings-and-votes/markups/energy-and-commerce-committee-vote-hr-3043-hr-2786-hr-3050-hr-2883-hr>

Donna Gilmore  
949-204-7794

On 6/27/2017 7:55 AM, Donna Gilmore wrote:

H.R. 3053 preempts state, local and even other federal water rights, and other rights. Hearing is Wednesday morning.

Please do what you can to stop this and alert those on the House Energy and Commerce Committee members why they should oppose this bill. Major environmental groups are opposing this.

The bill is very misleading and 75 pages long, so I doubt most understand all the impacts of this bill.

Link to bill and House hearing.

<https://energycommerce.house.gov/hearings-and-votes/markups/energy-and-commerce-committee-vote-hr-3043-hr-2786-hr-3050-hr-2883-hr>

More details below.

Thanks,  
Donna Gilmore  
SanOnofreSafety.org  
949-204-7794  
[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)

----- Original message -----

From: Donna Gilmore <[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)>  
Date: 6/26/17 10:29 PM (GMT-08:00)  
To: Sean Alcorn <[salcorn@nrdc.org](mailto:salcorn@nrdc.org)>, [ACTNET-](#)

[NUCLEAR@LISTS.SIERRACLUB.ORG](mailto:NUCLEAR@LISTS.SIERRACLUB.ORG), NoNukesYall <[no-new-nukes-yall@yahoo.com](mailto:no-new-nukes-yall@yahoo.com)>, NFC Summit Group <[nirs@sanonofre.com](mailto:nirs@sanonofre.com)>, Decommission San Onofre <[decommission@sanonofre.com](mailto:decommission@sanonofre.com)>  
Cc: Gary Headrick <[gary@sanclementegreen.org](mailto:gary@sanclementegreen.org)>, Kevin Kamps <[kevin@beyondnuclear.org](mailto:kevin@beyondnuclear.org)>, Judy Curry <[fargojay@aol.com](mailto:fargojay@aol.com)>  
Subject: Fwd: [ACTNET-NUCLEAR] Urgent organizational sign on letter in opposition to Shimkus's (R-IL) dangerously bad radioactive waste bill! Act right away!

Sean,  
Please include San Onofre Safety as a sign on to oppose the Shimkus bill *H.R.3053, the Nuclear Waste Policy Amendments Act of 2017*.

San Onofre Safety  
Donna Gilmore  
SanOnofreSafety.org  
949-204-7794  
[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)

Whether people are pro or anti moving the waste to a centralized facility or elsewhere this is a bad bill that **preempts** state, local and existing federal water rights and other rights. It also removes critical safety requirements for monitored retrievable storage and transport.

Here's a recent handout explaining some of the problems with the Holtec thin-wall canister system, including the New Mexico proposed Consolidated Interim Storage facility (referred to in this bill as Monitored Retrievable Storage). The Holtec system as well as other thin-wall canister systems provide neither a monitored nor retrievable fuel storage system.

<https://sanonofresafety.files.wordpress.com/2015/10/designedtoleakholtec-cis-2017-06-24.pdf>

The NRC has not approved the Holtec high burnup fuel transport cask because Holtec has not proved they can inspect the canisters for cracks or determine if the fuel inside the container is damaged. This bill is a way to spend the Waste Fund without producing the results we need for safe storage and transport. Waste has to cool for decades before it can be transported, so there is no reason to rush a bad bill that won't solve the problem anyway. It wastes money on Yucca Mountain when the science has already proven it's an unsafe site to bury the waste and will just pour more ratepayer money down another rabbit hole.

I urge all organizations to sign on to oppose H.R. 3053 and contact your House Representatives to oppose this bill. I doubt they know the traps in this bill to take away (preempt) water rights and other state, local and federal rights. I've spent days analyzing this bill, so if someone has a question feel free to contact me.

I spoke to one of the staff writers of this bill. He's assuming we can rely on the Nuclear Regulatory Commission to provide all the safety protections, so we don't need the safety requirements in the current law.

He was unaware the NRC is approving canisters that can crack and cannot be inspected, maintained, repaired or monitored to prevent leaks.

Thanks,  
Donna

----- Original message -----

From: Kevin Kamps <[kevin@BEYONDNUCLEAR.ORG](mailto:kevin@BEYONDNUCLEAR.ORG)>

Date: 6/26/17 3:35 PM (GMT-08:00)

To: [ACTNET-NUCLEAR@LISTS.SIERRACLUB.ORG](mailto:ACTNET-NUCLEAR@LISTS.SIERRACLUB.ORG)

Subject: [ACTNET-NUCLEAR] Urgent organizational sign on letter in opposition to Shimkus's (R-IL) dangerously bad radioactive waste bill! Act right away!

Dear Sierra Club Nuclear-Free Campaign,

Sean Alcorn of Natural Resources Defense Committee sent the following, urgent group sign on letter, to a list serve I am on. He has given his okay for me to share it with this list as well:

*[Hey folks,*

*We're expecting the full [U.S. House of Representatives] Energy & Commerce committee to mark up several bills later this week, several of which we oppose. Among these is Shimkus's (still not yet formally introduced and numbered) "Nuclear Waste Policy Amendments Act of 2017," which would only put our nation's nuclear waste storage policy on the wrong track yet again. We have a number of significant concerns laid out in the attached letter [PASTED IN BELOW INSTEAD], and are sending this around for a quick round of sign-on in advance of the markup.*

*Please send me an email [[<SALCORN@NRDC.ORG>](mailto:SALCORN@NRDC.ORG)] before noon [Eastern time] Tuesday [June 27th] if you'd like to sign on. [Organizations only please.]*

*Thanks, and with apologies for the quick turnaround,*

SEAN ALCORN

*Legislative Advocate  
Climate and Clean Air Program*

NATURAL RESOURCES

DEFENSE COUNCIL

1152 15TH STREET NW, SUITE 300

WASHINGTON, DC 20005

T [202.717.8195](tel:202.717.8195)

C [202.897.9674](tel:202.897.9674)

[SALCORN@NRDC.ORG](mailto:SALCORN@NRDC.ORG)

Please consider signing your group onto this letter! To sign your group on, email [SALCORN@NRDC.ORG](mailto:SALCORN@NRDC.ORG)

by 12 Noon Eastern time/11AM Central time/10AM Mountain time/9AM Pacific time tomorrow (Tuesday)! Thanks!

---Kevin Kamps, Beyond Nuclear

TEXT OF THE GROUP SIGN ON LETTER, BELOW:

[June XX, 2017

The Honorable John Shimkus

Chairman

Subcommittee on the Environment

Committee on Energy and Commerce

U.S. House of Representatives

2125 Rayburn House Office Building

Washington, D.C. 20515

The Honorable Paul D. Tonko

Ranking Member

Subcommittee on the Environment

Committee on Energy and Commerce

U.S. House of Representatives

2125 Rayburn House Office Building

Washington, D.C. 20515

Re: H. R. \_\_\_\_ "The Nuclear Waste Policy Amendments Act of 2017

Dear Chairman Shimkus and Ranking Member Tonko:

We write in opposition to the most recent draft of, H. R. \_\_\_\_ "The Nuclear Waste Policy Amendments Act of 2017" (115<sup>th</sup> Congress, 1<sup>st</sup> Session). This bill will, in its current state, put our nation's nuclear waste storage policy on the wrong track yet again. It ignores environmental concerns, states' rights and consent to host the waste in the first instance, and attempts to truncate public review in order to force a "solution" – either Yucca Mountain or a new consolidated interim storage site – that have both proven to be unworkable. Rather than blindly charge forward at the cost of public safety and public resources, we urge Congress to reject this bill and start the important and necessary work on a comprehensive set of hearings to commence building a publicly accepted, consent based repository program.

The bill you will vote on retains all the flaws contained in an earlier draft. Some of the harms noted in that letter include unwise efforts to recommence the licensing process for proposed repository at Nevada's Yucca Mountain. This is a project certain to fail the NRC's licensing process due to the geology and hydrology of the site that make it unsuitable for isolating spent nuclear fuel for the required time. Next, the draft legislation suggests going forward with a consolidated storage proposal before working out the details of a comprehensive legislative path to solve the nuclear waste problem, entirely severing the link between storage and disposal, and thus creating, an overwhelming risk that an interim storage site will determine or function as de facto final resting place for nuclear waste. The draft provides no safety, environmental or public acceptance criteria, only speed of siting and expense. This is precisely the formula that produced the failure of the Yucca Mountain process and made it, as the previous administration noted, "unworkable." Other provisions fail to respect Nevada's water rights and conflict with the well-established and necessary requirements of the National Environmental Policy Act, 42 U.S.C. §4321, *et seq.* Doing so exacerbates the public interest community's (and that of Nevada) objection of the last two decades – that the process of developing, licensing, and setting environmental and oversight standards for the proposed repository has been, and continues to be, rigged or weakened to ensure that the site can be licensed, rather than provide for safety over the length of time that the waste remains dangerous to public health and the environment.

And of the three amendments previously offered by the minority, currently withdrawn and potentially being negotiated behind closed doors, only the respecting of Nevada's control over its water rights offered by Representative Cardenas would positively affect an otherwise misguided

bill. The amendment from Representative Peters to sever the remaining link between storage and disposal is highly objectionable and runs precisely counter to former Senator Jeff Bingaman's wise admonition that "interim storage can play an important role in a comprehensive waste management program, but only as an integral part of the repository program and not as an alternative to, or de facto substitute for, permanent disposal." And the amendment from Representative Matsui sets us on path to go forward in the next few years with a consolidated storage proposal before working out the details of a comprehensive legislative path to solve the nuclear waste problem and, frankly, creates an overwhelming risk that an interim storage site in New Mexico, Utah, or even Texas (although the Texas site just requested that its license application be held in abeyance) will be the de facto final resting place for nuclear waste.

This will not work. It is likely those states will, in some form or another, resist being selected as the dumping ground for the nation's nuclear waste without a meaningful consent based process and regulatory authority that garners both public acceptance and a scientifically defensible solution. Further, and also just as damning, it sets up yet another attempt to ship the waste to Yucca Mountain irrespective of its certain likelihood of failing the regulatory process, or seek to revive the licensed Private Fuel Storage site that has been strongly opposed in Utah or even open up New Mexico's Waste Isolation Pilot Plant (WIPP) facility for spent nuclear fuel disposal despite strong opposition and contrary to 25 years of federal law. The latter site also was designed and intended for nuclear waste with trace levels of plutonium, not spent fuel (and we note, a site that has already seen an accident dispersing plutonium throughout the underground and into the environment, contaminating 22 workers, and thus the site was functionally inoperable for years). All of this runs precisely counter to the core admonition of the previous administration's [Blue Ribbon Commission for America's Future](#) ("BRC") that "consent" come first.

The waste will not be going anywhere for years and it should be incumbent on Congress to fix problems in a meaningful fashion, not attempt an expedient solution that is destined to fail, again.

Our concerns, many of which were detailed above or in earlier letters, remain. We would be pleased to work with any and every member of the committee on a feasible, constructive path forward, but this draft legislation would put the nation's nuclear waste storage policy on the wrong track yet again and we urge you to reject it. Thank you for your consideration of our views.

Sincerely,]

---

Kevin Kamps  
Radioactive Waste Watchdog

Beyond Nuclear  
6930 Carroll Avenue, Suite 400  
Takoma Park, Maryland 20912

Cell: [\(240\) 462-3216](tel:(240)462-3216)  
Fax: [\(301\) 270-4000](tel:(301)270-4000)  
[kevin@beyondnuclear.org](mailto:kevin@beyondnuclear.org)  
[www.beyondnuclear.org](http://www.beyondnuclear.org)

Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.

\*\*\*\*\*

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Virus-free. [www.avg.com](http://www.avg.com)

**From:** [Donna Gilmore](#)  
**To:** [Ken Alex](#); [Street, Joseph@Coastal](mailto:Street.Joseph@Coastal); [Barker, Kevin@Energy](mailto:Barker, Kevin@Energy); [Heather Hutt](#); [Dave Freeman](#)  
**Cc:** [Judy E. Jones](#)  
**Subject:** URGENT H.R. 3053 Preempts state water rights. Hearing Wed. Shimkus's (R-IL) dangerously bad radioactive waste bill! Act right away!  
**Date:** Tuesday, June 27, 2017 7:55:28 AM

---

H.R. 3053 preempts state, local and even other federal water rights, and other rights. Hearing is Wednesday morning.

Please do what you can to stop this and alert those on the House Energy and Commerce Committee members why they should oppose this bill. Major environmental groups are opposing this.

The bill is very misleading and 75 pages long, so I doubt most understand all the impacts of this bill.

Link to bill and House hearing.

<https://energycommerce.house.gov/hearings-and-votes/markups/energy-and-commerce-committee-vote-hr-3043-hr-2786-hr-3050-hr-2883-hr>

More details below.

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

----- Original message -----

From: Donna Gilmore <donnagilmore@gmail.com>  
Date: 6/26/17 10:29 PM (GMT-08:00)  
To: Sean Alcorn <salcorn@nrdc.org>, ACTNET-NUCLEAR@LISTS.SIERRACLUB.ORG, NoNukesYall <no-new-nukes-yall@yahoogroups.com>, NFC Summit Group <nirs@sanonofre.com>, Decommission San Onofre <decommission@sanonofre.com>  
Cc: Gary Headrick <gary@sanclementegreen.org>, Kevin Kamps <kevin@beyondnuclear.org>, Judy Curry <fargojay@aol.com>  
Subject: Fwd: [ACTNET-NUCLEAR] Urgent organizational sign on letter in opposition to Shimkus's (R-IL) dangerously bad radioactive waste bill! Act right away!

Sean,  
Please include San Onofre Safety as a sign on to oppose the Shimkus bill *H.R.3053, the Nuclear Waste Policy Amendments Act of 2017*.

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

Whether people are pro or anti moving the waste to a centralized facility or elsewhere this is a bad bill that **preempts** state, local and existing federal water rights and other rights. It also removes critical safety requirements for monitored retrievable storage and transport.

Here's a recent handout explaining some of the problems with the Holtec thin-wall canister system, including the New Mexico proposed Consolidated Interim Storage facility (referred to in this bill as Monitored Retrievable Storage). The Holtec system as well as other thin-wall canister systems provide neither a monitored nor retrievable fuel storage system.

<https://sanonofresafety.files.wordpress.com/2015/10/designedtoleakholtec-cis-2017-06-24.pdf>

The NRC has not approved the Holtec high burnup fuel transport cask because Holtec has not proved they can inspect the canisters for cracks or determine if the fuel inside the container is damaged. This bill is a way to spend the Waste Fund without producing the results we need for safe storage and transport. Waste has to cool for decades before it can be transported, so there is no reason to rush a bad bill that won't solve the problem anyway. It wastes money on Yucca Mountain when the science has already proven it's an unsafe site to bury the waste and will just pour more ratepayer money down another rabbit hole.

I urge all organizations to sign on to oppose H.R. 3053 and contact your House Representatives to oppose this bill. I doubt they know the traps in this bill to take away (preempt) water rights and other state, local and federal rights. I've spent days analyzing this bill, so if someone has a question feel free to contact me.

I spoke to one of the staff writers of this bill. He's assuming we can rely on the Nuclear Regulatory Commission to provide all the safety protections, so we don't need the safety requirements in the current law. He was unaware the NRC is approving canisters that can crack and cannot be inspected, maintained, repaired or monitored to prevent leaks.

Thanks,  
Donna

----- Original message -----

From: Kevin Kamps <kevin@BEYONDNUCLEAR.ORG>

Date: 6/26/17 3:35 PM (GMT-08:00)

To: ACTNET-NUCLEAR@LISTS.SIERRACLUB.ORG

Subject: [ACTNET-NUCLEAR] Urgent organizational sign on letter in opposition to Shimkus's (R-IL) dangerously bad radioactive waste bill! Act right away!

Dear Sierra Club Nuclear-Free Campaign,

Sean Alcorn of Natural Resources Defense Committee sent the following, urgent group sign on letter, to a list serve I am on. He has given his okay for me to share it with this list as well:

MARIA ESCOBEDO  
533 STANLEY AVE.  
ESCONDIDO, CA 92026  
June 23, 2017

Dayna Bochco  
Chairperson  
California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

Email to: c/o [Joseph.Street@coastal.ca.gov](mailto:Joseph.Street@coastal.ca.gov)

SUBJECT: San Onofre Decommissioning

Please deny a Coastal Permit to Southern California Edison (SCE) for the decommissioning of the San Onofre nuclear power plant, including the October 2015 permit for the new Independent Spent Fuel Storage Installation (ISFSI).

There is no clear independent expert study, to relocate, or maintain a SAFE storage.  
There is no safe plan for errors, leaks, inspections.

This is



- DANGEROUSLY close to our military base,
- devastatingly close to our oceans,
- 8.4 million people within 30 mile radius,
- railroad system,
- main freeway connecting north and south,
- border patrol station,
- will be under water at points of climate change/high tide,
- is in a tsunami inundation zone
- a few kilometers from Newport-Inglewood/Rose Canyon earthquake fault,
- easily accessed by terrorists from freeway or ocean.

If you store 3,600,000 lbs of spent nuclear fuel on the edge of the beach in a new ISFSI it is a gross violation of the Coastal Act.

A mechanical engineer with 42 years of design and management experience has written you. "From the successes and failures I have witnessed, three principles have proven to be consistently true. All three apply to every design including those for the storage of nuclear waste.

1. Theoretical designs never exactly match real world experience
2. Design safety factors that are based on estimates and assumptions without real world experience and data and are too often, and likely, flawed
3. Avoid overconfidence in your own design rationale"

Those who ran the reactor, (based on complaints to the NRC) had the worst safety record of any reactor in the country. A press release reports that there has been a Severity Level IV violation of NRC requirements related to the licensee's failure to follow a procedure requirement to test the density of the important-to-safety (ITS) grout that was placed under the cavity enclosure containers. Surely there are undiscovered design errors, improper tests and workmanship flaws.

Your approval of this deadly mistake cannot be corrected for an estimated 250,000 years.

Handwritten signature of Maria Escobedo in cursive script.

June 22, 2017

Mr. Jack Ainsworth, Director  
California Coastal Commission  
45 Fremont Street  
San Francisco, Ca. 94105

RE: SCE' s request to dispose of nuclear waste  
on San Onofre Beach

Dear Mr. Ainsworth,

Please find enclosed copies of a letter I mailed to the San Diego Union and similar but shorter version to the Los Angeles Times. Per your ex-parte communications rule, I am enclosing copies for all the commissioners thru your office for distribution. I would like to quote your Misson statement with this distribution.

"The Commission is committed to protecting and enhancing California's coast and ocean for present and future generations. It does so through careful planning and regulation of environmentally-sustainable development, rigorous use of science, strong public participation, education and effective intergovernmental coordination."

The Commission's approval to bury tons of nuclear waste on the beach at San Onofre violates every goal and aspiration stated in this statement and endangers all of us and future generations.

Sincerely,



S.J. Wolfsheimer

PO Box 3077

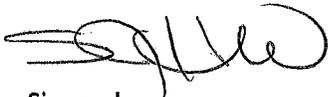
Rancho Santa Fe, Ca. 92067

Dear Editor:

Storing radioactive waste from Southern California Edison's (SCE's) closed nuclear power plant on San Onofre beach is insane. The site is on an active earthquake fault in a tsunami zone and will be subject to corrosion and rising sea levels. We will be exposed to a hazard without remedy. Yet four regulatory agencies – the U.S. Dept. of Energy, Nuclear Regulatory Commission (NRC), California Public Utilities commission (PUC), and California Coastal Commission – have approved this plan.

SCE chose to close the San Onofre plant and sue the Mitsubishi Corp. after a radiation leak rather than make repairs as required by its contract with Mitsubishi. A court of arbitration found that SCE deliberately delayed these repairs, and it ordered SCE to pay Mitsubishi's legal bills amounting to over \$50 million dollars. SCE's callous decision to close the plant rather than repair it and to leave nuclear waste without an acceptable plan for its disposal, amounts to criminal negligence.

The next Coastal Commission hearing will be in August in Malibu. (Darrell Issa's request that they meet in San Diego or Orange County was rebuffed.) I urge your readers to attend this meeting and to contact [shutsanonfre@citizenoversight.org](mailto:shutsanonfre@citizenoversight.org) for further updates and information.



Sincerely,

S.J. Wolfsheimer  
PO Box 3077, RSF, Ca. 92067  
858-945-8764

**From:** [Dettmer, Alison@Coastal](mailto:Dettmer,Alison@Coastal)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** Fw: San Onofre CC Hearing Location  
**Date:** Monday, June 19, 2017 4:50:15 PM

---

For the record.

---

**From:** Ainsworth, John@Coastal  
**Sent:** Monday, June 19, 2017 4:44 PM  
**To:** Dettmer, Alison@Coastal  
**Subject:** FW: San Onofre CC Hearing Location

-----Original Message-----

From: J B Alberts [<mailto:jbalberts@hotmail.com>]  
Sent: Monday, June 19, 2017 3:49 PM  
To: Ainsworth, John@Coastal  
Subject: San Onofre CC Hearing Location

Mr. Ainsworth/California Coastal Commission,

I join the thousands of voices who are requesting the Coastal Commission move the August hearing on moving the spend fuel from San Onofre from its current Malibu location to either south Orange County or north San Diego County to permit the resident's most impacted by the plan to be able to participate in the process.

Respecting the public by allowing their input has to be the first task of any public servant group. Holding this meeting in far north LA county is disrespectful of the local residents.

I join Representative Issa in demanding that you move the meeting to an area convenient to locally impacted residents.

Sincerely,

J B Alberts  
Solana Beach, CA

**From:** [Schwartz, Noaki@Coastal](mailto:Schwartz.Noaki@Coastal)  
**To:** [Dettmer, Alison@Coastal](mailto:Dettmer,Alison@Coastal); [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** FW: Waste Storage - San Onofre - Malibu Meeting  
**Date:** Wednesday, June 14, 2017 1:06:12 PM

---

FYI...

Noaki Schwartz  
Public Information Officer  
California Coastal Commission  
[Noaki.Schwartz@Coastal.ca.gov](mailto:Noaki.Schwartz@Coastal.ca.gov)  
c 562-833-5487

**From:** David Williams [mailto:[dwilli117369@gmail.com](mailto:dwilli117369@gmail.com)]  
**Sent:** Wednesday, June 14, 2017 12:59 PM  
**To:** Schwartz, Noaki@Coastal  
**Subject:** Waste Storage - San Onofre - Malibu Meeting

Noaki,

I am willing to bet this meeting could still be moved to OC or San Diego in a heartbeat. However, if you insist on holding it 80 miles away from the site, with difficult traffic all the way, at least provide a live feed with a Q&A provision.

Thank you,  
David Williams

--

**David Williams**

---

Phone/Text: (619) 804 - 6178  
Email: [dwilli117369@gmail.com](mailto:dwilli117369@gmail.com)  
Linkedin: <https://www.linkedin.com/in/gdavidwilliams>

**From:** [Ray Lutz](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** Please hold San Onofre meeting near the nuclear plant  
**Date:** Wednesday, June 14, 2017 9:49:54 AM

---

Dear Coastal Commission:

We have been told you are planning to provide an informational meeting about San Onofre in August in Malibu. We also noticed you provided very limited public comment related to this topic in San Diego. Please have a special meeting on this subject close to the plant so people in the surrounding area do not have to hire a bus to come to the regular meeting in Malibu. We are extremely disappointed with the handling of members of the public that wanted to speak on this issue in San Diego, and if this is what is planned for the meeting in Malibu, it is hardly an appropriate response. You claim to embrace public involvement but actions speak louder than words.

We notice that you:

- > Frequently allot only 2 minutes per speaker instead of the normal 3 minutes.

- > Do not have public scoping meetings before you start processing a permit application.

- > Do not list permits being processed at the time nor supporting information on your website.

- > Regularly have ex parte meetings with applicants without notifying the public (in advance).

Your actions show that you do not embrace public involvement, and have structured your policies and working practices to avoid public scrutiny.

--Ray Lutz

--

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Ray Lutz  
Citizens' Oversight Projects (COPs)  
<http://www.citizenoversight.org>  
619-820-5321

***Received June 8 – 16, 2017***

**32 copies of the following letter** (example attached):

Dear Commissioners:

I live in Southern California and do not want San Onofre used as a nuclear waste storage site.

Rather than simply putting radioactive material in drums with a 25-year life span, please hold it in the controlled environment of the cooled storage onsite.

Once a final storage site is located, I ask that you safely move the waste there and get it away from 8.5 million people.

Thank you,

*Received June 8 from:*

---

Carol C. Hilton  
3091 Buena Hills Dr.  
Oceanside, CA 92056

Tharani Jayaratnam  
3621 Four Peaks St.  
Carlsbad, CA 92010

Jane Mackenzie  
4310 Auklet Way  
Oceanside, CA 92057

Ki Nyborg  
1876 Outrigger Ln.  
Carlsbad, CA 92008

Donna Rencsak  
4563 Picadilly Court  
Carlsbad, CA 92010

*Received June 12 from:*

---

Charles W. Cleveland  
2168 Country Place  
Escondido, CA 92026

Michelle Cassel Gomez  
4772 Sequoia Place  
Oceanside, CA 92057

Sandra Eberlein  
435 Zezere Dr.  
Oceanside, CA 92057

Christine Esteban  
2617 Banbury Ct.  
Carlsbad, CA 92010

Sara Hagaman  
1949 Valley Rd.  
Oceanside, CA 92056

Lawrence D. Kornit  
1537 Ranchero Dr.  
Oceanside, CA 92057

Ruben Major  
405 Helix Way  
Oceanside, CA

Karen S. Pendergast  
2402 Granada Way  
Carlsbad, CA 92010

Suzanne Ryan  
699 Eaton St. #36  
Oceanside, CA 92054

Thomas E. Schaffer  
39 Trinity St.  
Oceanside, CA 92057

*Received June 14 from:*

---

Joan Bullock  
Michael Ross Bullock  
1800 Bayberry Dr.  
Oceanside, CA 92054

Donald Gomez  
4772 Senora Place  
Oceanside, CA 92057

Jane M. Haydon  
255 Starling Ln.  
Oceanside, CA 92057

Sharlene Hamilton  
502 Pontico Dr  
Oceanside, CA

Sheila Kadah  
1092 Greenway Rd.  
Oceanside, CA 92057

Eva Kerckhove  
1330 Evergreen Dr.  
Cardiff, CA 92007

Robert Kingins  
4938 Composition Ct.  
Oceanside, CA 92057

Deanna Kuhn  
340 Amber Ln.  
Vista, CA 92084

Blaise Latorre  
Deborah Latorre  
1205 Woodhaven Dr.  
Oceanside, CA 92056

Beverly Martinez  
412 Santa Dominja  
Solana Beach, CA 92075

Amanda Mascia  
3625 Amigos Ct.  
Oceanside, CA 92056

Max S. Meyerson  
Natalie S. Meyerson  
388 Justina Dr.  
Oceanside, CA 92057

Todd Warren  
789 Aldea Dr.  
Oceanside, CA 92057

*Received June 16 from:*

---

Chris S. Barroso  
[CBAR@UMICH.EDU](mailto:CBAR@UMICH.EDU)  
Encintas, CA

Stephen C. Bosworth  
1774 Jasmine Way  
Oceanside, CA 92054

Ethan Johnson-Moore  
[EthanDylan@aol.com](mailto:EthanDylan@aol.com)  
Oceanside, CA

Laurie Judge  
3621 Vista Campana St. #58  
Oceanside, CA 92057

***Received June 8 – 16, 2017***

**32 copies of the following letter** (example attached):

Dear Commissioners:

I live in Southern California and do not want San Onofre used as a nuclear waste storage site.

Rather than simply putting radioactive material in drums with a 25-year life span, please hold it in the controlled environment of the cooled storage onsite.

Once a final storage site is located, I ask that you safely move the waste there and get it away from 8.5 million people.

Thank you,

*Received June 8 from:*

---

Carol C. Hilton  
3091 Buena Hills Dr.  
Oceanside, CA 92056

Tharani Jayaratnam  
3621 Four Peaks St.  
Carlsbad, CA 92010

Jane Mackenzie  
4310 Auklet Way  
Oceanside, CA 92057

Ki Nyborg  
1876 Outrigger Ln.  
Carlsbad, CA 92008

Donna Rencsak  
4563 Picadilly Court  
Carlsbad, CA 92010

*Received June 12 from:*

---

Charles W. Cleveland  
2168 Country Place  
Escondido, CA 92026

Michelle Cassel Gomez  
4772 Sequoia Place  
Oceanside, CA 92057

Sandra Eberlein  
435 Zezere Dr.  
Oceanside, CA 92057

Christine Esteban  
2617 Banbury Ct.  
Carlsbad, CA 92010

Sara Hagaman  
1949 Valley Rd.  
Oceanside, CA 92056

Lawrence D. Kornit  
1537 Ranchero Dr.  
Oceanside, CA 92057

Ruben Major  
405 Helix Way  
Oceanside, CA

Karen S. Pendergast  
2402 Granada Way  
Carlsbad, CA 92010

Suzanne Ryan  
699 Eaton St. #36  
Oceanside, CA 92054

Thomas E. Schaffer  
39 Trinity St.  
Oceanside, CA 92057

*Received June 14 from:*

---

Joan Bullock  
Michael Ross Bullock  
1800 Bayberry Dr.  
Oceanside, CA 92054

Donald Gomez  
4772 Senora Place  
Oceanside, CA 92057

Jane M. Haydon  
255 Starling Ln.  
Oceanside, CA 92057

Sharlene Hamilton  
502 Pontico Dr  
Oceanside, CA

Sheila Kadah  
1092 Greenway Rd.  
Oceanside, CA 92057

Eva Kerckhove  
1330 Evergreen Dr.  
Cardiff, CA 92007

Robert Kingins  
4938 Composition Ct.  
Oceanside, CA 92057

Deanna Kuhn  
340 Amber Ln.  
Vista, CA 92084

Blaise Latorre  
Deborah Latorre  
1205 Woodhaven Dr.  
Oceanside, CA 92056

Beverly Martinez  
412 Santa Dominja  
Solana Beach, CA 92075

Amanda Mascia  
3625 Amigos Ct.  
Oceanside, CA 92056

Max S. Meyerson  
Natalie S. Meyerson  
388 Justina Dr.  
Oceanside, CA 92057

Todd Warren  
789 Aldea Dr.  
Oceanside, CA 92057

*Received June 16 from:*

---

Chris S. Barroso  
[CBAR@UMICH.EDU](mailto:CBAR@UMICH.EDU)  
Encintas, CA

Stephen C. Bosworth  
1774 Jasmine Way  
Oceanside, CA 92054

Ethan Johnson-Moore  
[EthanDylan@aol.com](mailto:EthanDylan@aol.com)  
Oceanside, CA

Laurie Judge  
3621 Vista Campana St. #58  
Oceanside, CA 92057

Dear Commissioners:

I live in Southern California and do not want San Onofre used as a nuclear waste storage site.

Rather than simply putting radioactive material in drums with a 25-year life span, please hold it in the controlled environment of the cooled storage onsite.

Once a final storage site is located, I ask that you safely move the waste there and get it away from 8.5 million people.

Thank you.

*Charles W. Cleveland*

*Charles Cleveland*

Signature

RECEIVED

JUN 12 2017

Print Name

CALIFORNIA  
COASTAL COMMISSION

*2168 Country Place*

Mailing Address

*Escondido, CA 92026*

City

**From:** [Kay and Joe](#)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** FW: San Onofree Nuke Dump  
**Date:** Saturday, June 03, 2017 12:49:36 PM

---

**I am a 20 year resident of Oceanside, a surfer, beach lover, and homeowner. I care about the environment and my children and grandchildren and the 8 million people possibly affected by this tragedy.**

**No intelligent people would store nuclear waste at San Onofre so close to the beach. Mother nature has a way of destroying man made projects regardless of how safe they may appear.**

**Only Greedy people who don't live anywhere around here would even consider this. It's always about the money and making sure people vote the way money wants them to. Can you and your conscience accept and live with this most dangerous situation? Oh, I forgot. You don't live anywhere near here, right?**

**Joseph Hill**

From: [Lisa Ortega](#)  
To: [Street\\_Joseph@Coastal](mailto:Street_Joseph@Coastal)  
Subject: Stop Nuke Dump  
Date: Monday, May 29, 2017 7:25:50 PM  
Attachments: [PastedGraphic-1.tiff](#)

---

Greetings: We are writing to ask you to change your approach in issuing a Coastal Permit to Southern California Edison (SCE) for the decommissioning of the San Onofre nuclear power plant, including the October 2015 permit for the new Independent Spent Fuel Storage Installation (ISFSI).

You were raised in San Diego. You are an attorney. However, your analysis of the ISFSI permit showed no regard for your city and was void of any lawyer like analysis. Contrary to Commission group-think the Commission's hands were not tied. Further planting 3,600,000 lbs of spent nuclear fuel on the edge of the beach in a new ISFSI was a gross violation of the Coastal Act on its face.

The Commission evaluation of the ISFSI project was flawed and deficient. You did not employ an independent expert to advise the Commission on whether there were other spent fuel storage sites. You did not use an expert to determine the feasibility of a relocation transportation plan. You did not retain an expert to determine how long the spent fuel could be safely stored in the pools.

You did not do adequate legal research. If you had, you would have learned the Commission had broad

jurisdiction to deny the permit e.g. on “cost grounds.” See Pac. Gas & Elec. Co. v. State Energy Res. Conservation & Dev. Comm'n, (U.S. 1983) 461 U.S. 190. Did you even read this case?

You did not ask the staff if it used an expert to see if there were other storage sites. You did not ask if the staff used an expert to develop a relocation transportation plan. You did not ask the staff for a clear legal analysis of the scope of the Commission's jurisdiction. You went on SCE guided tour and finished up as follows: what it did to determine if there were other sites

MS. BOCHCO: Okay. Um, all right. Well, I think that's all my questions. Well, thank you very much.  
[R.T. 81-86]

When you came to San Diego on 10 May 2017, interested parties attempted to engage you in a constructive conversation about these issues. After you arbitrarily limited public discussion of San Onofre decommissioning to 8 minutes you then ignored the speakers you allowed to speak.

We demand the Coastal Commission open up to public scrutiny and public involvement the process the Commission is now using to consider the permits needed to decommission the San Onofre nuclear power plant.

Thank You,

Lisa Ortega

Young Living Independent Distributor #2511244

[jortega40@cox.net](mailto:jortega40@cox.net)



**From:** [Elizabeth Sainz](#)  
**To:** [Street\\_Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Subject:** San Onofre Decommissioning  
**Date:** Monday, May 29, 2017 1:35:24 PM

---

Please acknowledge receipt and forward to Chairperson Bocho:

Dayna Bochco  
Chairperson  
California Coastal Commission  
45 Freemont Street #2000  
San Francisco, Ca 94105

Hello Dayna!

Please change your approach in issuing a Coastal Permit to Southern California Edison (SCE) for the decommissioning of the San Onofre nuclear power plant, including the October 2015 permit for the new Independent Spent Fuel Storage Installation (ISFSI).

Those of us who live here are real live human beings with souls and beating hearts and families and friends who all deserve to live in a safe environment!

Planting 3,600,000 lbs of spent nuclear fuel on the edge of the beach in a new ISFSI sounds like the worst disaster yet to happen on the planet!!

How will you feel when you know it was because you allowed others to persuade you to do something so grossly neglectful and then disaster happens? All the money in the world won't help you when you are faced with the guilt and shame of creating a prime terrorist target, or destroying our precious ocean, atmosphere and planet.

I stand with others in demanding the Coastal Commission open up to public scrutiny and public involvement the process the Commission is now using to consider the permits needed to decommission the San Onofre nuclear power plant.

My understanding is that the most important thing that can be done in your power is to revoke the existing permit for the ISFSI, and not grant any additional permits to Southern California Edison, until the public is comfortable with a plan for the decommissioning of the plant, and the transfer of the spent fuel elsewhere.

It is my privilege and right as a citizen of this community to demand that the CCC REVOKE THIS PERMIT and NOT GRANT ANY ADDITIONAL PERMITS.

Thank You for your consideration,

Elizabeth Sainz

**From:** [ARLEEN HAMMERSCHMIDT](#)  
**To:** [Street, Joseph@Coastal](mailto:Street_Joseph@Coastal); [jwood@ci.oceanside.ca.us](mailto:jwood@ci.oceanside.ca.us); [jkern@ci.oceanside.ca.us](mailto:jkern@ci.oceanside.ca.us); [clowery@ci.oceanside.ca.us](mailto:clowery@ci.oceanside.ca.us); [jfeller@ci.oceanside.ca.us](mailto:jfeller@ci.oceanside.ca.us); [esanchez@ci.oceanside.ca.us](mailto:esanchez@ci.oceanside.ca.us)  
**Subject:** Safest & fastest-- Nuke Dump OFF San Onofrey Beach  
**Date:** Tuesday, May 30, 2017 1:15:08 PM

---

Dayna Bochco, Costal Commission Chair, and Oceanside City Council,

I live in Oceanside and do not want San Onofre used as a passive nuclear waste site. Instead, I request that it be maintained in the existing onsite storage system, supervised and relatively stable.

It's your responsibility to take the safest approach to dealing with this material, and leaving it in drums for future generations to worry about is inappropriate, irresponsible and unsafe.

Arleen Hammerschmidt

If exercise is medicine, get more!

**From:** [Nancy Keating](#)  
**To:** [Street, Joseph@Coastal](#); [jwood@ci.oceanside.ca.us](#); [clowery@ci.oceanside.ca.us](#); [jkern@ci.oceanside.ca.us](#); [Esther\\_Sanchez](#); [jfeller@ci.oceanside.ca.us](#)  
**Subject:** San Onofre Decommissioning  
**Date:** Tuesday, May 30, 2017 2:38:33 PM

---

I live in Oceanside, Sa Diego Co. and do not want San Onofre used as a passive nuclear waste site. Instead, I request that nuclear fuel waste be maintained in the existing onsite wet storage system, supervised and relatively stable. It's your responsibility to take the safest approach to dealing with this material, and leaving it in drums for future generations to worry about is inappropriate, irresponsible and unsafe.

Nancy Keating  
1423 Avocado rd  
O'side, 92054

**Street, Joseph@Coastal**

---

**From:** Gus Hawthorn <gushawthorn@gmail.com>  
**Sent:** Friday, May 26, 2017 8:05 PM  
**To:** Street, Joseph@Coastal  
**Subject:** San Onofre Nuclear Reactor Decommissioning and Waste Storage Concerns

Please acknowledge receipt and forward to Chairperson Bocho

Ms. Dayna Bochco  
Chairperson  
California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

Emailed c/o [Joseph.Street@coastal.ca.gov](mailto:Joseph.Street@coastal.ca.gov)

Re: San Onofre Decommissioning and Waste Storage

Dear Ms. Bochco,

Out of grave concern, I am writing to ask you to change your approach in issuing a Coastal Permit to Southern California Edison (SCE) for the decommissioning of the San Onofre nuclear power plant, including the October 2015 permit for the new Independent Spent Fuel Storage Installation (ISFSI). The analysis of the ISFSI permit shows no regard for Southern California beaches, the ocean and the 8.4 million people that will be affected when, not if, an accident occurs. Storing 3.6 million pounds of spent, highly radioactive, nuclear fuel 100 feet from the ocean is irresponsible and not at all in keeping with what the California Coastal Commission is supposed to stand for.

The Commission's evaluation of the ISFSI project is flawed and deficient.

You did not employ an independent expert to advise the Commission on whether there were other spent fuel storage sites. You did not ask staff if they had an expert advise them on alternate sites. You did not use an expert to determine the feasibility of a relocation transportation plan. You did not ask if the staff used an expert to develop a relocation transportation plan. You did not retain an expert to determine how long the spent fuel could be safely stored in the pools. Your failure to take these actions resulted in a storage plan with the following deadly problems and design flaws:

1. Waste that will remain deadly for more than 250,000 years
2. Waste that may never be moved
3. Storage canisters that are too big, too hot and too thin to transport safely
4. No requirements for inspections for almost 20 years
5. Currently no technology is available for inspection
6. Site will be under water at some point in time as seas rise due to climate change

7. High tide and storm surge ocean conditions will flood the site
8. The site is in a tsunami inundation zone
9. The Newport-Inglewood/Rose Canyon earthquake fault is just a few kilometers offshore
10. The site is a ready-made dirty bomb. Terrorists can too easily launch a conventional weapon in to the site from the freeway or ocean

I express these concerns as a mechanical engineer with 42 years of design and management experience. From the successes and failures I have witnessed, three principles have proven to be consistently true. All three apply to every design including those for the storage of nuclear waste.

1. Theoretical designs never exactly match real world experience
2. Design safety factors that are based on estimates and assumptions without real world experience and data and are too often, and likely, flawed
3. Avoid overconfidence in your own design rationale

No design is without risk and the risk must be assessed with what a failure could lead to. If you design a consumer product and it fails to function in the field a person could be injured or the manufacturer could suffer a financial loss. If you design an aircraft component and it fails in flight you could cause the death of hundreds of people. If your design for nuclear waste storage is flawed, if the safety factor assumptions made in the absence of actual experience and data are wrong, and the storage system fails in a location that can harm 8.4 million people and contaminate the ocean the disaster is of inconceivable horror and magnitude.

Do not leave the San Onofre nuclear waste in the hands of those who ran the reactor that, based on complaints to the NRC, had the worst safety record of any reactor in the country. If that is not proof enough of their ineptitude, a press release today reports that there has been a Severity Level IV violation of NRC requirements related to the licensee's failure to follow a procedure requirement to test the density of the important-to-safety (ITS) grout that was placed under the cavity enclosure containers. There are no doubt other undiscovered design errors, failures to properly test and workmanship flaws. All of this is assurance of a disaster.

Mitigate the danger of a failure by getting the nuclear waste off the beach and in to a lower risk, properly operated, storage location as soon as it can safely be moved. One such site, partially owned by SCE, is the Palo Verde reactor site in the Arizona desert.

Finally, too much of what has transpired so far has been done in what may be illegal secret meetings with no public input. I demand the Coastal Commission provide for public involvement the process the Commission is now using to consider the permits needed to decommission the San Onofre nuclear power plant and storage of spent waste.

Thank You,

Henry Hawthorn

**From:** [Marni Magda](#)  
**To:** [Bochco, Dayna@Coastal](#); [Street, Joseph@Coastal](#); [Marni Magda](#)  
**Subject:** Angeles Chapter Sierra Club San Onofre Task Force Support for SCE ISFSI permit  
**Date:** Friday, May 26, 2017 11:56:05 AM  
**Attachments:** [CCC Glenn Pascall letter in support of permit for ISFSI oct 6 2015.pdf](#)  
[CEP May 11 2017 final notes NRC and CIS.pdf](#)

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Dear Commissioner Dayna Bochco,

Please find attached the letter sent by Glenn Pascall for the Angeles Chapter of the Sierra Club in support of the permit you granted in October 2015 to SCE to construct and operate an ISFSI for unit 2 and 3 spent nuclear fuel.

The Angeles Chapter of the Sierra Club wishes to reinforce our support of your decision to grant the permit. We wish to be on the record for your August 2017 meeting that the Angeles Chapter still supports the permit you granted in 2015.

I am the new Angeles Chapter Sierra Club San Onofre Task Force chair as Glenn has stepped down. I am also his replacement on the SCE Community Engagement Panel (CEP).

FYI attached as well are the SCE CEP May 11, 2017 notes about SCE dry storage and CIS sites discussed at the meeting.

If I can be of any other help with information, please let me know.

Thank you for all you do to protect our California Coast. We must all work to find a way to remove the dangerous spent nuclear fuel from our coast as soon as possible, away from people and environmental hazards.

Best Regards,

Marni Magda  
Chair Angeles Chapter Sierra Club San Onofre Task Force

**Statement of Glenn Pascall, Chair  
Sierra Club Task Force on San Onofre**

**Re: California Coastal Commission  
Application No. 9-15-0228**

**Agenda of October 6, 2015**

I write in support of the application by Southern California Edison Company to construct and operate an Independent Fuel Storage Installation (ISFSI) for storage of spent nuclear fuel from Units 2 and 3 at the San Onofre Nuclear Power Station in San Diego County.

Those who care about the California coast have two primary concerns regarding spent nuclear fuel at San Onofre. The first concern is to move fuel rods from pools to dry cask storage as rapidly as possible. The second concern is to remove storage casks from the vulnerable San Onofre site at the earliest available opportunity.

Opinion is virtually unanimous that worst-case hazards are far more severe for nuclear waste stored in fuel pools rather than in dry casks. Construction of concrete structures holding steel canisters is an essential part of this transition.

Commission staff has wisely suggested that after 20 years an amendment be required to continue operation of the facility. This is appropriate not only as a checkpoint to determine whether the ISFSI is providing safe storage but is also timely for review of alternatives to on-site storage.

For more than 30 years it has been a matter of national policy – and of Sierra Club policy – that nuclear waste be removed from operating sites and stored at one or more remote long-term repositories. In the interim, no site has been licensed for operation. As a result, spent fuel has remained on-site at all decommissioned commercial nuclear power plants.

Some fear that construction of an ISFSI on-site at San Onofre will simply assure permanent storage there. Yet the ISFSI is essential to

support dry storage and closure of spent fuel pools. To reconcile these concerns, we would ask the Commission to note the following additional aspects of project design and operation:

- Dry cask storage should be in canisters that can be transported if the opportunity arises to remove them from San Onofre.
- Transportation connections at San Onofre should be maintained in a condition that enable spent fuel removal by rail or truck.
- Efforts at the state, regional and national level should be encouraged to develop safer, less exposed storage sites to which spent nuclear fuel can be moved from sites such as San Onofre that are subject to multiple risk factors.
- If such options develop, with the active support of Edison, responsible federal agencies should remove the canisters from the ISFSI and transport them to remote storage.

In conclusion, we support the Commission's authorizing timely construction of an ISFSI at San Onofre to mitigate unnecessary risks related to the extended use of wet storage when dry storage options are available onsite. Every possible threat (earthquakes, tsunamis, hostile acts, operational errors) that might potentially lead to the release of radiation from spent fuel in dry storage onsite is magnified many fold by additional risks arising from the potential loss of electrical power and water supply needed to keep spent fuel fully submerged and protected in pools.

Once power generation operations stop and remaining spent fuel is moved to wet storage, as has occurred at San Onofre, every available caution should be taken by moving the spent fuel to dry storage and ending any use of wet storage as soon as best practices allow.

Thank you for consideration of our thoughts.

Sincerely,

Glenn Pascall, Chair

## Sierra Club Task Force on San Onofre

## **CEP May 11, 2017 Meeting Notes on Nuclear Regulatory Commission (NRC) Decommissioning Oversight and Consolidated Interim Storage (CIS) Development Projects by Marni Magda Angeles Chapter Sierra Club San Onofre Task Force**

### **Opening**

David Victor opened the meeting and gave the mike to CEP member Glenn Pascall to announce his resignation, his appreciation of the dedication of the CEP to keep the public informed, and his hope that Marni Magda, his alternate for the evening, would continue the environmentalist role on the CEP. David Victor and Tom Palmisano thanked him for his tireless dedication to the progress of ongoing communication to the public about San Onofre as it decommissions.

### **Decommissioning Update by SCE Tom Palmisano**

Tom Palmisano explained that Waste Control Specialists (WCS) would not be in attendance as previously planned to answer Consolidated Interim Storage (CIS) questions about the WCS project in West TX because they had suspended the licensing process with the Nuclear Regulatory Commission (NRC) until the sale of the property to Energy Solutions is completed. A pending antitrust suit over the merger must be resolved first.

(Not covered in the meeting but important to understand future decisions: Energy Solutions is a Salt Lake city-based nuclear waste disposal firm that owns land in 40 states. It buries Low Level Waste and owns the rights since 2006 to recycling technology. WCS West Tx site is 14,000 acres. Energy Solutions is the company that has been hired by SCE to Decommission San Onofre)

Tom Palmisano reviewed the 20 year plan for decommissioning, 2014 to 2033 which will end decommissioning except for the cement pad where the dry canisters await removal by the DOE, the Independent Spent Fuel Storage Installation (ISFSI).

The Price Anderson utility insurance covering \$11 billion for a nuclear reactor incident is no longer in effect at San Onofre because the NRC deems the risks much less once a reactor is shut down. SCE has an insurance policy for this phase of decommissioning that will be explained at the next CEP meeting on August 31<sup>st</sup>.

Answering questions submitted before the meeting about why the new ISFSI which is closer to the ocean had to be built, he explained (using slide 19) the constraints of the current ISFSI where the AREVA canisters have been stored. The 30 additional modules available at this location for new canisters are insufficient to empty either Unit 2 or Unit 3 spent fuel pools. No matter what dry canister system SCE had used, the additional ISFSI closer to the Pacific Ocean would have been needed.

The ISFSI is to be completed and ready for Holtec Dry Storage canisters by the end of this year, 2017. All of the systems necessary for emptying the spent fuel pools will be in place and offloading will begin in January 2018 after a NRC review and approval. It will take until mid-2019 to fill all 73 Holtec canisters one at a time placing them in the overpac system at the ISFSI. After that year and a half focused on emptying the pools, the majority of the dry canisters will be ready to move.

By 2020 these Holtec canisters, 70 of the 73 can be transported to CIS if there is a place to take them and federal law allows the DOE to accept stranded fuel to be moved to a temporary off site location. Three will need additional cooling time before transportation, but all 73 need to be monitored above ground as they cool for 20 to 60 years before they can be put in a final deep geological repository.

Of the 33 Areva canisters, half could go to a final repository now if one existed. The other Areva canisters with high burn up fuel as part of their canister rods would need to wait until 2020. There are 17 Unit one canisters containing assemblies made of stainless steel instead of zirconium that will need until 2030 to be moved.

The transportation overpack casks to be used by the DOE railcar must be built for San Onofre canisters to be moved. They need a two year lead time for construction.

(This process must begin by 2020 in order for San Onofre canisters to enter the queue for railcar transportation to the ELEA Holtec CIS facility in New Mexico, and the DOE railcar and escort car must be built by 2022. This cannot happen without federal legislation.)

Tom Palmisano spoke next to remind the audience that this summer the California State Lands Commission (SLC) will present its draft Environmental Impact Report (EIR) for public comment. The California Environmental Quality Act of 1970 (CEQA) (Discussed at the last CEP meeting) will address some elements of how decommissioning will be done. These decisions the public can comment upon such as if the pedestrian walk way along the ocean will remain or be removed. Will the outtake and intake pipes be removed or will some kind of reef mitigation be requested? Will the cement foundation dug deep into the bluff to support the facility be left or removed? In June or July, when the draft comes out, our three California State Lands Commissioners are listening. Also coming up will be a submission to the California Coastal Commission for a Coastal Development Permit. The California Energy Commission (CEC) has been asked to give input into a California plan for CIS that gets spent nuclear fuel removed from California.

Tom Caughlan, CEP representative for USMC at Camp Pendleton, stated that the SCE leased area on the land side of the I 5 would return the use of that land asap to military training and any buildings that could work toward that purpose would be left for the military to use. He said the ocean side of the I 5 will one day be returned to greenfield status. That time frame will depend on when the SNF canisters are all removed.

### **NRC Decommissioning Oversight**

Two speakers from the NRC ,Bruce Watson and Ray Kellar, gave an overview of the NRC decommissioning oversight for the nation's decommissioning commercial reactors. 20 power reactors are currently in the process of decommissioning. 10 CFR 50.2 gives the rules and oversight demands for this process. Connecticut Yankee, CT Maine Yankee, ME and Trojan, Or were examples of sites that have been dismantled safely. Inspections are planned a year in advance. There are core and discretionary inspection procedures. ISFSI inspection procedures are explained in MC1246. There are five procedures for different phases of the ISFSI. For NRC inspection reports go to ADAMS <http://www.nrc.gov/reading-rm/adams.html>; use the advanced search feature with docket numbers 05000361, 05000362 and 07200041 for SONGS.

When asked if the cooling pools or the dry storage was safer, Kellar answered they are both safe.

When asked about who holds the national records on what exactly is stored in each dry canister in the nation, the first answer was the data is kept on computers by the nuclear facility in charge. Tom Palmisano then added he sends periodic reports to the DOE.

### **Consolidated Interim Storage (CIS) Development Projects**

SCE supports offsite storage, both a permanent repository and CIS. Two potential sites were discussed.

**WCS of Andrews County, TX** did not attend because of the suspension of their NRC application until a merger with Energy Solutions is determined. Slide 52 shows the location of the 14,000 acres owned by WCS with the closest town being Eunice, NM 3 miles, Hobbs, NM 15 miles and Andrews and Odessa TX about 30 miles away. Slide 53

shows the current and future uses of the 14,000 acres including the 8 phases to develop CIS of 40,000 metric tons of SNF for 40 years or longer, and shows existing railroad and proposed new rail siding for the ISFSI. Of WCS 14,000 acres, the largest portion on the map of the current uses is designated a Federal Waste Facility.

**Eddy-Lea Energy Alliance (ELEA)** chairman John Heaton spoke about their project for up to 10,000 dry storage canisters in partnership with Holtec International in the area of the counties of Eddy and Lea in New Mexico, 35 miles from Hobbs and Carlsbad and 15 miles north of the current federal government defense geological repository, the Waste Isolation Pilot Project (WIPP). The ELEA is composed of the cities of Carlsbad and Hobbs and the counties of Eddy and Lea. This community alliance purchased 1000 acres and has strong local support for the CIS project. They have the consent of the Governor, and a 71% yes vote of the NewMexico house and senate. They will sell the property to Holtec as soon as the NRC licensing process is approved.

Holtec International senior vice president Pierre Oneid supplied more details about the project. Holtec products for the US are 100% US made in factories in Ohio and Pennsylvania. Interim storage will save the tax payer substantial sums. \$400 million a year is lost to lawyers suing the Federal government to recover SNF management expenses and \$12 billion by consolidating expenses over the decades of monitored retrievable storage necessary for high burn up SNF. The initial license with the NRC is for 500 canisters. The 10,000 canister maximum planned for future phases would use 500 acres of the 1000 acres of the ELEA purchased land. Operations for phase one (500 canisters) could commence in 2022.

Mr. Oneid stated that he hoped a federal law would pass that allowed the Department of Energy (DOE) to change the DOE priority ranking for accepting Spent Nuclear Fuel (SNF) from oldest fuel to accepting stranded SNF at decommissioning sites, allowing, stranded fuel to be taken to an offsite interim storage for monitored retrievable storage. He said the system of oldest fuel first would be extremely inefficient, a few canisters from each of 100 sites, versus the ability to remove many canisters at one time for example San Onofre with 103 ready for transportation by 2022. A federal law must pass before that can happen.

**Public Comments** lasted one hour with concerns addressed by David Victor, Tim Brown and Dan Stetson

## List of Acronyms

ADAMS	Nuclear Regulatory Commission's Public Documents Library <a href="http://www.nrc.gov">www.nrc.gov</a>
AREVA	French Nuclear Power Company
CEP	Community Engagement Panel
CEC	California Energy Commission
CEQA	California Environmental Quality Act of 1970
CIS	Consolidated Interim Storage
DOE	Department of Energy
ELEA	Eddy-Lea Energy Alliance
Holtec	Indian Nuclear Power Company
HOSS	Hardened On-Site Storage
ISFSI	Independent Spent Fuel Storage Installation
MRS	Monitored Retrievable Storage
NRC	Nuclear Regulatory Commission
SCE	Southern California Edison
SNF	Spent Nuclear Fuel
SLC	State Lands Commission
WIPP	Waste Isolation Pilot Project
WCS	Waste Control Specialists

**SPECIAL NOTE: LAST WEEK, THE SIERRA CLUB WAS INFORMED THAT MARNI MAGDA WAS IN FACT APPOINTED TO REPLACE GLENN PASCALL AS A MEMBER OF THE CEP. CONGRATULATIONS, MARNI**



**P.O. BOX 187, SAN CLEMENTE, CA 92674-0187**  
**PH: 949-498-5951 FAX: 949-498-9565**

**I DEMAND REVOCATION OF CCC PERMIT FOR ISFSI TO SOUTHEN CALIFORNIA EDISON**

May 23, 2017

Dayna Bochco  
Chairperson  
California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

Email to: c/o [Joseph.Street@coastal.ca.gov](mailto:Joseph.Street@coastal.ca.gov)

Re: San Onofre Decommissioning

My name is David Haycraft and I am a 40+ year resident of San Clemente, California. I have now attended several meetings on the topic of decommissioning the San Onofre Nuclear Power Plant (SONGS), and the existing plan to move forward with a "dry caste storage" plan for the spent nuclear waste (Independent Spent Fuel Storage Installation (ISFSI)).

Like many others in the process of "awakening" to this unacceptable plan, I find it absolutely ludicrous that your agency has issued this permit for the ISFSI back in 2015. The information I have seen shows that the California Coastal Commission's evaluation of the ISFSI project was flawed and deficient. You did not employ an independent expert to advise the Commission on whether there were other spent fuel storage sites. You did not use an expert to determine the feasibility of a relocation transportation plan. You did not retain an expert to determine how long the spent fuel could be safely stored in the pools, and you did not do adequate legal research on the matter.

I can only speak for myself, but the underlying (key word: lying) feeling I get from the granting of this permit is that huge amounts of money, power, and influence have been afforded to the members of the CCC, to allow for this to happen at all. I have seen several examples of how difficult it has been for the public, commercial, and even governmental agencies to get permits for projects that have far less environmental impact than burying 3,600,000 lbs of spent nuclear fuel on the edge of the ocean. This in itself tells me that something is awry at the CCC, and the Commission itself has most likely been corrupted.

My understanding is that the most important thing that can be done in your power is to revoke the existing permit for the ISFSI, and not grant any additional permits to Southern California Edison, until the public is comfortable with a plan for the decommissioning of the plant, and the transfer of the spent fuel elsewhere.

It is my privilege and right as a citizen of this community to demand that the CCC REVOKE THIS PERMIT and NOT GRANT ANY ADDITIONAL PERMITS.

Thank you for your consideration,

Sincerely,

David Haycraft  
PO Box 187  
San Clemente, CA 92674  
Cell: 949-842-8308

**From:** [Donna Gilmore](mailto:Donna.Gilmore@sanonofresafety.org)  
**To:** [Street, Joseph@Coastal](mailto:Street.Joseph@Coastal.ca.gov)  
**Subject:** Boral risks in dry casks  
**Date:** Tuesday, May 23, 2017 11:26:28 AM

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This is a link to one of the documents Dave mentioned to me below about the concern of problems with Boral Panels in dry storage. This NRC employee waited until retirement to report on this critical issue for fear of how it would affect his career. This issue needs to be addressed for San Onofre as well as other dry storage facilities. It appears the fuel assemblies can fuse to the aluminum/Boral panels. This can affect fuel assembly retrievability, so needs to be addressed asap before loading any more canisters into dry storage. Since partially cracked canisters cannot be transported per NRC safety transport regs and because canisters cannot be inspected for cracks or repaired, fuel assembly retrievability is required before transport. In addition, since boral is a safety feature to prevent criticality in sealed dry storage, existing stored canisters may be at risk.

<https://adamswebsearch2.nrc.gov/webSearch2/view?AccessionNumber=ML17069A437>

Donna Gilmore  
SanOnofreSafety.org  
949-204-7794  
[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)

----- Forwarded Message -----

**Subject:** Fwd: RE: Chart of thin wall canisters installed in U.S. with years installed  
**Date:** Tue, 23 May 2017 10:12:23 -0700  
**From:** Donna Gilmore <[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)>  
**To:** Street, Joseph@Coastal <[Joseph.Street@coastal.ca.gov](mailto:Joseph.Street@coastal.ca.gov)>

March 31, 2017 Dave Lochbaum conference call with me and others to discuss discrepancies of facts regarding dry storage and transport of spent nuclear fuel.

Transcript

[SafelyDecommissioningNuclearPowerPlantsTranscriptPageNum.pdf](#)

Audio of conference call

<https://fccdl.in/dieKJEsWI>

Donna Gilmore  
SanOnofreSafety.org  
949-204-7794  
[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)

----- Forwarded Message -----

**Subject:** RE: Chart of thin wall canisters installed in U.S. with years installed  
**Date:** Fri, 31 Mar 2017 20:27:56 +0000  
**From:** Dave Lochbaum <[DLochbaum@ucsusa.org](mailto:DLochbaum@ucsusa.org)>

**From:** [Donna Gilmore](mailto:Donna.Gilmore@Coastal)  
**To:** [Street, Joseph@Coastal](mailto:Street.Joseph@Coastal)  
**Subject:** Fwd: RE: Chart of thin wall canisters installed in U.S. with years installed  
**Date:** Tuesday, May 23, 2017 10:12:15 AM

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March 31, 2017 Dave Lochbaum conference call with me and others to discuss discrepancies of facts regarding dry storage and transport of spent nuclear fuel.

Transcript

[SafelyDecommissioningNuclearPowerPlantsTranscriptPageNum.pdf](#)

Audio of conference call

<https://fccdl.in/dieKJEsWl>

Donna Gilmore  
SanOnofreSafety.org  
949-204-7794  
[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)

----- Forwarded Message -----

**Subject:** RE: Chart of thin wall canisters installed in U.S. with years installed  
**Date:** Fri, 31 Mar 2017 20:27:56 +0000  
**From:** Dave Lochbaum <[DLochbaum@ucsusa.org](mailto:DLochbaum@ucsusa.org)>  
**To:** Donna Gilmore <[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)>, Bart Ziegler <[bziegler@toxco.net](mailto:bziegler@toxco.net)>, Stephen Kent <[skent@kentcom.com](mailto:skent@kentcom.com)>, Torgen Johnson <[torgenjohnson@hotmail.com](mailto:torgenjohnson@hotmail.com)>, Charles Langley <[langley@publicwatchdogs.org](mailto:langley@publicwatchdogs.org)>

Hello Donna:

First, while the phone call was not a debate, had it been a debate you easily won more points by my tally. And I admit to a bias, so an impartial scorer likely would have had you winning by a larger margin.

Second, thanks for out-debating me. My strong interest in reducing the spent fuel pool risk probably has had me not examining the dry storage risks as fully and deeply as I should have. Today's call helped me realize that.

During the call, I mentioned a DPO package on neutron absorbers in canisters and fuel rods that failed during vacuum drying at Millstone Unit 3. Those documents are available in ADAMS at:

DPO: ML17069A437

MP3: ML16348A065

Thanks,  
Dave Lochbaum

UCS

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**From:** Donna Gilmore [[donnagilmore@gmail.com](mailto:donnagilmore@gmail.com)]

**Sent:** Friday, March 31, 2017 3:40 PM

**To:** Bart Ziegler; Dave Lochbaum; Stephen Kent; Torgen Johnson; Charles Langley

**Subject:** Chart of thin wall canisters installed in U.S. with years installed

<https://sanonofresafety.files.wordpress.com/2015/10/d32-caskinventoryisfsichartandtable2016-06-26.pdf>

On 3/31/2017 7:02 AM, Donna Gilmore wrote:

Here's a link to the presentation I gave at the Chicago Leadership Summit on Nuclear Waste Management. It addresses the canister issues. I think we're all in agreement that the spent fuel pools are dangerous.

<https://sanofresafety.files.wordpress.com/2011/11/dry-cask-storage-dgilmore2016-12-03nirs.pdf>

My concern is we choose a dry storage solution that will not fail in 20 years and that can be inspected, monitored, maintained, repaired to avoid radioactive leaks. The NRC has provided evidence that the thin-wall canisters can crack and leak in 20 years. They admit they cannot currently be inspected, even on the outside. Even if you could find cracks, Holtec President says it's not feasible to repair them. They have no adequate monitoring system that provides enough warning to prevent leaks.

The pools are the only currently approved method to deal with failing canisters and to unload fuel. However, the NRC allows pools to be destroyed once empty.

Each canister contains about as much Cesium-137 as was released from Chernobyl. If the Zirconium clad fuel in the canisters is exposed to air at any temperature, the hydride buildup from the high burnup fuel can cause an explosion, just as it can in the pools.

With the pools we are at least able to monitor water levels and have the ability to make some repairs and have backup water supplies to keep the fuel covered with water.

With the thin-wall canisters, we have no redundancies or monitoring and will have no warning until after they crack and leak.

Even partially cracked canisters are not approved for transport in a thick transport cask, according to NRC safety regulations.

I'm interested in hearing what problems Dave is aware of with the thick wall steel Areva casks and thick wall ductile cast iron casks. I know metal seals may eventually wear out, but there are four redundant seals (two in each lid) and a remote pressure monitoring system that warns if there is a pressure change

(caused by a leaking seal). The seal can then be replaced.

I also recommend the casks be stored in a building similar to what is done in other countries such as Japan and Germany. The thick wall casks in the U.S. are still holding up, but if they were in a building it would provide additional environmental protection.

The VSC system mentioned in Dave's slide presentation is no longer manufactured. I agree it was a poor design and would never recommend that system. It is a totally different system using different materials and poor quality control. It is very different than the thin and thick wall systems used today.

Thanks,  
Donna

----- Original message -----

From: Bart Ziegler  
Date: 03/30/2017 4:29 PM (GMT-08:00)  
To: Dave Lochbaum , Donna Gilmore , Stephen Kent , Torgen Johnson , Charles Langley  
Subject: Friday's dialogue, instructions below

Thank you very much for your participation in this conversation. We look forward to a productive dialogue from coast to coast, and thank you.

Best, Bart

PS. all others listening to the conversation are welcome to text questions (I'll help moderate) to 619-300-1097 or send email, thanks

Bart Ziegler  
[www.samuellawrencefoundation.org](http://www.samuellawrencefoundation.org)  
Office: 858.481.1673 | Cell: 619.300.1097

1 Join the online meeting:

Online Meeting Link: <https://join.freeconferencecall.com/bziegler69>

Online Meeting ID: bziegler69

2 Dial into the conference:

Dial-in Number: (563) 999-1152 - United States

Access Code: 414360

SANTA CLARITA CA 913

Dear Commission members

I'm part of the #WomensMarch movement.  
I'm from San Luis Obispo  
and I'm concerned about

nuclear waste storage

Here's why:

There are safer places  
to store nuclear waste  
than at the beach. Choose  
a different location!

In the first 100 days of the new  
administration, I hope that you understand  
and take these concerns seriously.

Sincerely,

Dr. Sarah Bridger

100

10 ACTIONS  
100 DAYS



CA Coastal Commission  
SD Coast District office  
7575 Metropolitan Drive  
#103

San Diego, CA 92108

RECEIVED

MAY 22 2017

HEAR OUR  
VOICE

CALIFORNIA  
COASTAL COMMISSION  
SAN DIEGO COAST DISTRICT

WOMENSMARCH.COM/100

SANTA CLARITA CA 913

Dear Coastal Commission

I'm part of the #WomensMarch movement.  
I'm from San Luis Obispo, CA  
and I'm concerned about

nuclear waste in San Onofre, CA

Here's why:

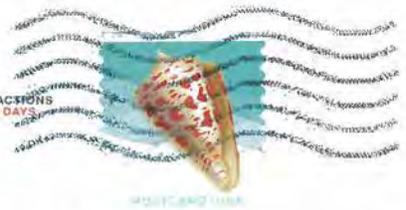
Southern CA Edison's plans to store  
nuclear waste within 100 ft of the  
beach are dangerous and unacceptable.  
Please stop it. Protect the  
environment and the public.

In the first 100 days of the new  
administration, I hope that you understand  
and take these concerns seriously.

Sincerely, Dr. Jennifer  
Denbow

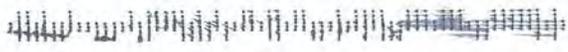
10

10 ACTIONS  
100 DAYS



CA Coastal Commission  
SD Coast District office  
7575 Metropolitan Drive  
#103  
San Diego, CA 92108

92108-442128



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MAY 2 2 2017

HEAR OUR  
VOICE

CALIFORNIA  
COASTAL COMMISSION  
SAN DIEGO COAST DISTRICT



WOMENSMARCH.COM/100



SANTA CLARITA 91314  
Dear SD Coastal Commission

I'm part of the #WomensMarch movement  
I'm from San Luis Obispo, CA  
and I'm concerned about

Nuclear waste in San Onofre, CA

Here's why:

Southern CA Edison's plans to store nuclear waste from the San Onofre power plant w/in 100ft. of the beach are destructive & unacceptable. Please put a stop to their plan &

In the first 100 days of the new administration, I hope that you understand and take these concerns seriously.

Sincerely,

Elizabeth D'Amico

insist on storage safer for the public & environment.

California Coastal Commission  
SD Coast District Office  
7575 Metropolitan Drive  
#103  
San Diego, CA 92108



RECEIVED

MAY 22 2017

HEAR OUR VOICE

CALIFORNIA COASTAL COMMISSION SAN DIEGO COAST DISTRICT



WOMENSMARCH.COM/100



May 20, 2017

COVER PAGE:

Coastal commission  
45 Fremont Street  
Suite 2000  
San Francisco, CA 94105

This envelope contains a letter for each Coastal Commissioners listed at this address. I made a copy for their staff. These are all sent in one envelope to ensure they are received at the same time. I sent the other members the same letter at their addresses, including Governor Brown and Legistrative Director, Sarah Christie.

Please make sure they are distributed to all current members right away, including all new replacement commissioners or alternates. I have submitted these to become a MATTER OF RECORD.

Thank you,

A handwritten signature in cursive script that reads "Alice McNally".

Alice McNally  
1332 Stratford Ct.  
Del Mar, Ca 92014  
858-342-3244

May 20, 2017

Dayna Bochco and staff  
Coastal Commission, Executive Director  
45 Fremont St., #2000  
San Francisco, CA 94105-2219

I attended the Coastal Commission meeting 5/10-5/12 in San Diego, which you were present. I was appalled at the inattention and rudeness of the Chairwoman, Dayna Bochco. I was there to speak on the Nuclear Waste Dump permitted to Edison on San Onofre beach. This is a very grave mistake and in complete opposition to the Mission of the Coastal Commission!

Madam chair was so busy multi tasking that she would not make eye contact and give the first speaker, Mike Aquirre her attention. When asked, she very rudely insisted she could hear him and was very defensive about her right to go on multitasking. Ray Lutz, was the 2nd speaker. He also had to ask for her attention. When he insisted on extra time, she threatened him with ARREST.

A speaker on the 3rd day was given time by a woman in the audience, but Madam Chair shut him down quickly, claiming that the donor had not made out a speaker slip. This wasn't true. The donor had filled out and handed in her speaker slip. I and others saw the Commission scuffling the speaker slips, which I suspect is the reason my friend and I were never called to speak. We were there all three days.

Dayna Bochco, is unsuited to chair as she is rude, inattentive and indifferent to the speakers. This creates a very hostile environment. This issue is too important to not have the full attention of the Coastal Commission.

#### WHY THIS IS A BAD IDEA:

**DEADLY NUCLEAR WASTE:** and will remain so for up to 250,000 years. Containers only designed to last for 20 years.

**WRONG PLACE:** Located near 8.4 million residents within 50 miles. On eroding bluffs, an open active ocean, two earthquake faults, a ten lane freeway and a railroad line which make this dump susceptible to terrorists.

**TOO CLOSE TO THE WATER:** Climate change brings **RISING TIDES** and **WATER TABLE**. This permit allows storage only 6 inches above the current water table!

**CANISTERS TOO THIN, BIG, HOT, & HEAVY:** Susceptible to leakage from damage and corrosion. The canisters will be more difficult and dangerous to move as time passes. They are too large to store anywhere except Palo Verde Az., who are equipped to accept them.

**NO INSPECTIONS:** Are required by this permit and the technology for inspection does not yet exist.

**NEWLY DISCOVERED FAULTS:** Newport-Inglewood/Rose Canyon both Capable of 7.4. on the Richter Scale. We are 7 years overdue for this event!

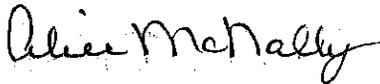
**PROCESS TOO QUICK:** Only 1 short public meeting which was designated to fly under the radar. It was never announced or reviewed by the Community Engagement Panel. Meetings that are designed to inform the public.

May 20, 2017

**BACKROOM MEETINGS:** The Commission held improper secret ex-parte meetings with the applicant, Southern California Edison.

**HOW COULD the PANEL HAVE GRANTED A PERMIT for this madness????** Because the Coast Commission says "they heard more from Edison than the public"? Well yeah, as the public was kept out of the meetings!

This matter **DESERVES** the **COASTAL COMMISSION'S COMPLETE ATTENTION!** Now is the time to reconsider and **REVOKE** this permit. **MOVE** this **DEADLY WASTE!**



Alice McNally  
1332 Stratford Ct.  
Del Mar, CA 92014  
858-342-3244

cc: John Ainsworth  
Ellie Turnbull-Sanders  
Mary Luévano  
Donne Brownsey  
Mary K Shallenberger  
Mark Vargas  
Ryan Sundberg  
Aaron Peskin  
Carole Groom  
Erik Howell  
Roberto Uranga  
Gregory Cox  
John Laird or Thomas Gibson  
Gavin Newsom or Rhys Williams, Jennifer Lucchesi  
Brian P. Kelly or Jeremiah Ketchum  
Belinda Faustinos  
Trent Orr  
and staff

**From:** [Dettmer, Alison@Coastal](mailto:Dettmer,Alison@Coastal)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** FW: nuclear waste on SD beach  
**Date:** Thursday, May 18, 2017 9:25:33 AM

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-----Original Message-----

From: Ainsworth, John@Coastal  
Sent: Thursday, May 18, 2017 8:52 AM  
To: Dettmer, Alison@Coastal  
Subject: FW: nuclear waste on SD beach

-----Original Message-----

From: Jessica Craven [<mailto:jescny@gmail.com>]  
Sent: Wednesday, May 17, 2017 8:30 PM  
To: Ainsworth, John@Coastal  
Subject: nuclear waste on SD beach

Hi, Mr. Ainsworth,

I just read about the fact that you guys are hoping to dump 3.6 million pounds of highly radioactive waste close to a San Diego beach. This is horrible! Please consider ceasing this plan! Keep our beautiful coastlines clean!

Thanks!

Warmly,

Jessica Craven  
4673 Cleland Ave.  
Los Angeles, CA 90065

**From:** [Dettmer, Alison@Coastal](mailto:Dettmer,Alison@Coastal)  
**To:** [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** FW: No nuclear waste storage in California  
**Date:** Thursday, May 18, 2017 9:25:11 AM

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-----Original Message-----

From: Ainsworth, John@Coastal  
Sent: Thursday, May 18, 2017 8:52 AM  
To: Dettmer, Alison@Coastal  
Subject: FW: No nuclear waste storage in California

-----Original Message-----

From: Jan Carpenter Tucker [<mailto:citizenjan@cox.net>]  
Sent: Wednesday, May 17, 2017 10:22 PM  
To: Ainsworth, John@Coastal  
Subject: No nuclear waste storage in California

Mr. Ainsworth,

Issuing a permit to store millions of pounds of radioactive nuclear waste in Southern California and near a beach in San Diego County is unconscionable. I don't know what you all are going to do about this travesty, but someone should have thought of the CONSEQUENCES of creating nuclear waste BEFORE they began creating it. An accident similar to the magnitude of Fukushima in Japan could result in terrible, far reaching conditions that would irreparably damage the world as we know it. Do not allow this stupid thing to happen.

Jan Carpenter Tucker  
San Diego, CA 92102

**From:** [max](#)  
**To:** [Street\\_Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Subject:** Please Revoke Permit Issued at San Onofre  
**Date:** Thursday, May 18, 2017 7:59:24 PM

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Joseph,

I am writing you to express my extreme discontent with the California Coastal Commission's decision to issue the permit to store nuclear waste in the given location at San Onofre in the currently designated canisters that do not guarantee the security and durability that such waste demands.

Please consider my voice and the voice of all my friends, family, fellow surfers and Southern California residents that my voice resonates with.

Thank you,

Maximilian Xeno Karnig

Masters of Fine Art Candidate at University of California, Irvine,  
[www.maxkarnig.com](http://www.maxkarnig.com)  
650 867 9810

**From:** [Vinod Arora](#)  
**To:** [Bart Ziegler](#)  
**Cc:** [Donna Gilmore](#); [Tom Palmisano](#); [Street. Joseph@Coastal](#); [NRC Chairman Stephen Burns](#)  
**Subject:** Re: Vinod Arora, P.E., CEO of AVP Arora International (A 501(c)3 Public Charity Professional Engineering Corporation for Nuclear Safety) answers about future of Nuclear Power  
**Date:** Thursday, May 11, 2017 5:30:28 PM

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San Clemente resident Donna Gilmore is the founder of [San Onofre Safety](#). She very wisely questions the quality of Edison's nuclear waste storage canisters, fearing their walls are too thin and too vulnerable to corrosion. Gilmore also says Edison doesn't have equipment in place to detect cracks or leaks in the canisters that could lead to the release of radiation.

[SCE Tom Palmisano describes the storage containers](#) as "robust," a "proven technology...The design exceeds California earthquake requirements, protects against water, fire or tsunamis'...inaccessible to missiles or projectiles."

AVP agrees 100% with Donna Gilmore and disagrees 200% with Tom Palmisano, NRC, Holtec, DOE, EPRI, IAEA, California Coastal Commission, San Onofre CEP, NEI and EPRI. On which planet Tom Palmisano, NRC, Holtec, DOE, EPRI, IAEA, California Coastal Commission, San Onofre CEP, NEI and EPRI are living on?.

**From:** [Vinod Arora](#)  
**To:** [legal.admin@sce.com](mailto:legal.admin@sce.com); [Tom Palmisano](#); [Ron.Nichols@sce.com](mailto:Ron.Nichols@sce.com); [Maureen Brown](#); [Doug Bauder](#); [Street, Joseph@Coastal](#)  
**Subject:** AVP- There is a high potential for failure of the proposed SCE, Holtec, DOE and Coastal Commission ISFSI approved design.  
**Date:** Wednesday, May 10, 2017 12:41:43 PM

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DOE selected 1" thick Inconel Alloy 22 as the outer corrosion barrier material for Yucca Mountain Repository waste packages. DOE tests demonstrated successfully that corrosion-resistant 1" thick Alloy 22 would protect waste packages after 1,000,000 years of exposure in Yucca Mountain Environment. By linear interpolation of general corrosion rate, corrosion resistant 1/8" thick Alloy 22 would exhibit a corrosion of 0.32 cm (1/8") in thin concentric alloy 22 stainless steel canisters after 125,000 years of exposure. Using a factor of safety of 10, corrosion resistant 1/8" thick Alloy 22 would exhibit a corrosion protection for at least 10,000 years of exposure.

Alloy 22 has a very stable passive film and would resist localized corrosion in the San Onofre Marine air environment. However, under aggressive environmental exposure conditions, the passive films may break down locally, leading to localized corrosion of the underlying thin stainless steel container. Inside the cask's ventilation ducts, robots can be attached to Alloy 22 metal surfaces via magnets or suction to examine the damage to Alloy 22 corrosion barrier and underlying thin stainless steel container.

The ISFSI monolithic concrete structure will be packed on the outside with 24 inches of montmorillonite-rich bentonite clay. This clay will act as a buffer and protect the ISFSI monolithic concrete structure and Alloy 22/stainless canister from corrosion and minor

movements in the ISFSI monolithic concrete structure. The clay buffer will gradually absorb water and swell to fill the space around any cracks in the ISFSI monolithic concrete structure. If any cracks occur in a canister, the clay buffer will prevent water from entering it. The buffer would also prevent the escape of any radioactive substances from the canister into the ocean.

AVP concludes, "American taxpayers have put over \$3.7 billion into Yucca Mountain—they deserve to see it completed. Hopefully, until Yucca Mountain due to new momentum from Trump Administration and Congress despite objections from Nevada starts receiving spent nuclear materials in more than 100 years. San Onofre ISFSI on the beach will remain a de facto repository for nuclear waste for 100 years or more. Thin steel storage canisters may start failing in as little as 17 to 20 years with through-wall cracks without the protection of outer corrosion barrier of Alloy 22. SCE decision to go with the stainless-steel canisters has everything to do with greed and money like the failed San Onofre Steam Generators built with better materials and designed to last for more than 60 years. After all, public is paying for ISFSI and thin containers and not SCE, DOE, NRC, SCE, CPUC, Coastal Commission, EPRI, Nuclear Industry and the Democratic Governor. The concerned residents, critics, and opponents are 100% correct, once the spent fuel is in canisters in the ground, there is a significant and realistic risk, it will remain there for 100 years or more to come. There is a high potential for failure of the proposed SCE, Holtec, DOE and Coastal Commission ISFSI approved design. Therefore, the ISFSI stored radioactive contents with concentric 1/8-inch thick Alloy 22 outer corrosion barrier and 1-4-inch-thick stainless steel inner corrosion/structural support barrier and infiltration/exfiltration clay/concrete

monolithic barriers would be safe from dangers presented by extreme environmental phenomena such as moist ocean air, hurricanes, tornado-borne missiles, earthquakes, and tsunamis. The costs and details for the proposed solution should be worked between SCE and Holtec."

Alloy 22, which is also sold under the brand names Hastelloy® C-22, Inconel® 22, is a fully austenitic nickel-based super alloy. Like many super-alloys, Alloy 22 offers resistance against corrosion, pitting, crevice corrosion, intergranular attacks, and stress corrosion cracking. It gives users high ductility, which aids in cold forming and is resistance to aqueous corrosion at elevated temperatures. Alloy 22 is utilized in nuclear fuel reprocessing, flue gas desulfurization, and many seawater applications.

Most of the existing multi-barrier concepts for geological repositories of HLW require the use of swelling clay materials as part of the engineered barrier system. A commonly proposed material for use as the swelling clay component is montmorillonite-rich bentonite and can be considered for use in filling the volume between the excavated rock and the ISFSI Monolithic Concrete Structure. The suitability of a swelling clay for repository application is determined by its basic mineralogic composition, chemical properties, swelling and sorption properties as well as the environment into which it is installed. It must be able to fill and maintain an ability to swell to close any open space remaining between the ISFSI Monolithic Concrete Structure and the surrounding geologic medium (swelling properties). Its swelling properties will also act to limit oxygenation of the region adjacent to the ISFSI Monolithic Concrete Structure

once water saturation is achieved and thereby limit ISFSI Monolithic Concrete Structure corrosion. The sealing material also needs to provide a degree of radionuclide retardation through its sorption properties and maintaining the low rate of water movement through it (hydraulic properties). These properties all need to be maintained and monitored over the life of ISFSI under a wide variety of seawater and groundwater conditions.

**From:** [Vinod Arora](#)  
**To:** [Pam Patterson](#)  
**Cc:** [legal.admin@sce.com](mailto:legal.admin@sce.com); [Street, Joseph@Coastal](mailto:Street, Joseph@Coastal)  
**Subject:** Re: Down from 247 to 173 lbs  
**Date:** Tuesday, May 09, 2017 9:48:12 AM

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Hi Pam,

Thanks for your excellent public service. I may show up in the next CEP meeting on 11th. Still pushing the operational data for San Onofre Unit 3 RSGs Tube Leak Root Cause from SCE, which is tied with San Onofre Closure, Tainted and Crooked SONGS Settlement and dangerous 3.6 million lbs of waste. This issue is worse than the Trump Russian Investigation.

NRC, SCE, Mitsubishi, CPUC, and SCE Global Consultants have wasted billions of dollars in presenting a fake San Onofre Unit 3 RSGs Tube Leak Root Cause and are still trying to conduct new experiments in Canada to determine another fake San Onofre Unit 3 RSGs Tube Leak Root Cause. Sad, Sad, Sad, Public Nuclear Safety Story. I am the only one who has determined the True San Onofre Unit 3 RSGs Tube Leak Root Cause after spending 5 years and \$500,000 of my own money and issued practical and simple guidelines for the long-term design of new nuclear steam generators and safety of existing nuclear steam generators in the world.

The nuclear waste problem is not that difficult to solve but SCE's misinformed Technical Staff and SCE's sympathetic and controlled anti-safety, public elected CEP members are misleading the people and dragging their feet with a questionable, unproven design, fake data, false promises and delay tactics. The fact is that Holtech, NRC, DOE and EPRI are pushing SCE to complete the ISFSI construction. We will see what happens next in the Tainted and Crooked SONGS Settlement and dangerous 3.6 million lbs of waste. Please circulate this email to SCE's sympathetic and controlled anti-safety, public elected CEP members. Sad, Sad, Sad, Public Nuclear Safety Story. Thanks



Joan Suffredini  
2635 Crest Dr., Carlsbad,  
Ca., 92008  
May 6, 2017

California Coastal Commission  
7575 Metropolitan Dr., Suite 103  
San Diego, Ca.

Dear Commissioners:

I live in the Coastal Zone in San Diego County and I am very concerned that Nuclear waste from the decommissioned San Onofre power plant is to be stored 100 feet from the high tide line in an earthquake zone in a region with over 8 million people near major rail and highway transportation.

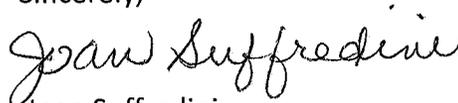
As you know, earthquakes can happen at any time and even if the storage is supposedly built to withstand quakes of over 7.0 on the Richter scale, cracking and subsequent leaking could occur at that level. An offshore earthquake could trigger a Tsunami such as Fukushima in Japan could render a large area uninhabitable. The earthquake in Northridge caused up to 44 billion dollars in damage in 20 seconds and that was only 6.7.

Although there is no ideal solution to the storage problem, any of the proposed places are better than San Onofre. The Palo Verde nuclear plant in Arizona is a possibility and there are others, even east of the freeway on Camp Pendleton is better than San Onofre.

I don't believe we can trust that the construction and maintenance will be safe. After all, San Onofre power plant had to be closed because of construction flaws. Other environmental disasters have been caused by human mistakes or shortcuts to boost profits.

You must require that Southern California Edison and San Diego Gas and Electric move the San Onofre nuclear waste immediately out of the coastal zone. This is probably the most important issue you will have to protect our coast.

Sincerely,

  
Joan Suffredini

RECEIVED

MAY 10 2017

CALIFORNIA  
COASTAL COMMISSION  
SAN DIEGO COAST DISTRICT



Many thanks for your time (keeping in mind that time is exactly what's at issue).

Very best,  
Darius Degher

**From:** [Vinod Arora](#)  
**To:** [Tom Palmisano](#); [Doug Bauder](#); [Ron.Nichols@sce.com](mailto:Ron.Nichols@sce.com); [legal.admin@sce.com](mailto:legal.admin@sce.com); [Street\\_Joseph@Coastal](mailto:Street_Joseph@Coastal)  
**Subject:** AVP - Edison should modify the thin Holtech canisters by the addition of a 1/8-inch outer corrosion layer of Alloy 22 and move them from the beach on an above ground pad at the reservoir parking lot  
**Date:** Monday, April 17, 2017 8:49:09 AM

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Parties in the San Onofre Nuclear Generating Station waste lawsuit have agreed to enter settlement talks and postpone the hearing until July 14. Activist group [Citizens Oversight](#) had sued the California Coastal Commission, contesting the agencies decision to allow majority plant owner Southern California Edison to store the waste 100 feet from the beach in thin & unsafe canisters.

Citizens Oversight says it will be holding events to gather public comments before the settlement talks begin in about two weeks. In 177 days, SCE will be burying deadly toxic nuclear waste that's poisonous to humans for 250,000 years in containers that are only guaranteed to last 25 years," said Charles Langley, executive director of Public Watchdogs. "This will be the largest publicly owned nuclear waste dump in the United States, it will be located 108 feet from the beach."

Last week, Southern California Edison [announced](#) it was in settlement talks over the nuclear storage. "We believe the parties in the case and many community leaders share a common goal to transfer San Onofre's used nuclear fuel off-site as soon as reasonably possible," said Tom Palmisano, the company's vice president and chief nuclear officer, in a statement. "We are hopeful that settlement discussions will permit the parties to reach a mutually agreeable solution."

AVP - Edison should modify the thin Holtech canisters by the addition of a 1/8-inch outer corrosion layer of Alloy 22 and move them from the beach on an above ground pad at the reservoir parking lot like Palo Verde and Plant Hatch until they can be shipped to a Permanent Repository. This will provide better protection against Tsunami, Coastal Erosion, Seismic Earthquake, Groundwater Infiltration and Moist Air Environment Corrosion. The canisters will be away from public view and

secure. This is the only viable temporary solution that will permit the parties to reach a mutually agreeable solution, until the waste can be shipped offsite to New Mexico Holtech Interim Repository. Palo Verde and Yucca Mountain sites are not viable solutions at this time or in the near future.

**From:** [Vinod Arora](#)  
**To:** [Ron.Nichols@sce.com](mailto:Ron.Nichols@sce.com); [legal.admin@sce.com](mailto:legal.admin@sce.com); [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)  
**Subject:** AVP San Onofre Nuclear Wisdom  
**Date:** Thursday, April 13, 2017 12:43:19 PM

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Edison should modify the thin Holtech canisters by the addition of a 1/8-inch outer corrosion layer of Alloy 22 and move them from the beach on an above ground pad at the reservoir parking lot like Palo Verde Containers until they can be shipped to a Permanent Repository. This will provide better protection against Tsunami, Coastal Erosion, Seismic Earthquake, Groundwater Infiltration and Moist Air Environment Corrosion. The canisters will be away from public view and secure.

## **NFL Mediator will take on San Onofre case**

Lawyers on both sides of the multibillion-dollar fight over who should pay for the San Onofre nuclear plant failure said Wednesday they have agreed to mediation — and hired a heavy hitter in the dispute resolution business. Layn Phillips, who oversaw the 2013 deal between National Football League owners and players that set aside \$765 million for injuries caused by on-field collisions, is expected to jump-start the San Onofre negotiations that have dragged on for months. Southern California Edison lawyer Henry Weissmann, San Diego consumer attorney Michael Aguirre and others made the announcement in a joint filing with the 9th U.S. Circuit Court of Appeals and the California Public Utilities Commission. According to the filing, Phillips will host the initial conference by telephone next Wednesday. Three in-person mediation sessions

are scheduled for June.

### **AVP Newsroom**

SCE closed San Onofre Units 2 & 3 due to its negligence and mistakes in the design and operation of RSGs. The **NFL Mediator** discussions are confidential and non-binding and SCE will fight the return of any illegal and tainted settlement money award by Judge Layn Phillips to the Ratepayers. SCE is once again lying and misleading the Regulators, CPUC, Media and Public.

### **Edison Newsroom**

International Tribunal Confirms MHI Supplied Defective Equipment for San Onofre Nuclear Plant, Caps Arbitration Award at Contract Liability Limit.

### **Mitsubishi Newsroom**

Mitsubishi did not dispute the allegation made by the Claimants that the replacement steam generators in Unit 3 experienced unacceptable wear, but Mitsubishi did argue that it fulfilled its warranty obligations under the Purchase Order. The ICC tribunal also rejected claims made by the Claimants alleging that Mitsubishi had committed fraud and gross negligence.

### **AVP Newsroom**

International Tribunal did not state that MHI Supplied Defective Equipment. Edison accepted the SCE Designed/MHI Supplied Defective Equipment after successful function testing (See Note 4). AVP Arora International, Inc. (AVP) filed a motion (Note 1) and 111-page San Onofre Unit 3 Tube Leak Root Cause (Note 2) with CPUC for a Party Status stating, “\$3 Billion cost to ratepayers for SCE's mistakes (experimental or inadvertent) without explanation are not excusable. SCE's silence is neither reasonable nor in the ratepayer' interest. Arora needs to be invited in the CPUC San Onofre Settlement proceedings, to tell the truth of his 5-year investigation under oath.” SCE, NRC, Dr. Pettigrew and MHI are not able to challenge Arora's conclusions of the technical analysis of San Onofre Unit 3 RSGs Tube Leak conducted based on San Onofre's Units 2 & 3 RSGs operational data contained in NRC AIT Secret Files.

RSGs operational data shown in the SCE Unit 3 Tube Leak Root Cause does not match with the operational data contained in the NRC Secret Files and NRC AIT Report as shown in Note 2, Attachment 2, pages 10 & 49-51. SCE Legal Department Attorney Walker A. Matthews, III has refused several times on flimsy and ridiculous grounds to release the San Onofre Units 2 & 3 RSGs operational data to AVP Attorney Tom McIntosh. Now SCE has lost the Arbitration against MHI, the only way to technically and legally prove that SCE did not make intentional mistakes in the operation of San Onofre Unit 3 RSGs and justify SONGS Settlement, SCE Legal Department must release the data. After reviewing the data, AVP can ask San Onofre's

Manager of Plant Operations John D. Davis, why the actual primary coolant heat transfer rates to the secondary steam side of the Unit 3 RSGs exceeded the design limits by 21 Million Btu/Hour (5,789-5,768) and functional acceptance criteria limits by 109 Million Btu/Hour (5,789-5,680). Was this done with MHI's concurrence and permission? If that is true, then Mitsubishi can certainly be blamed for approving the adverse operation of the defective Unit 3 RSGs and it can nullify the effect of adverse ICC Tribunal Findings and put SCE on a favorable track with Layn Phillips. Otherwise, it is crystal clear for CPUC Judges, Courts and Layn Phillips to decide that SCE closed San Onofre due to its negligence and operational mistakes and SCE legally cannot charge any money to the Ratepayers. SCE has not accepted responsibility for installing flawed equipment without an NRC License and operating the San Onofre Unit 3 RSGs exceeding the redline in violation of the accepted functional accepted configuration for higher profits that led to the shutdown of the plant amid a radiation leak in January 2012. (Reference: Note 2, Attachment 2, AVP/DAB Table 1, Page 49). SCE is once again lying and misleading the Regulators, CPUC, Media and Public. Ron Nichols should have fired Doug Bauder and Tom Palmisano, who were hiding the True Root Cause for Unit 3 Tube Leak Root Cause, which led to closure of San Onofre Plant. Peter Dietrich was repeating what Doug Bauder and Tom Palmisano told him.

<http://docs.cpuc.ca.gov/EFileSearchForm.aspx>, Search Proceeding Number I1210013

Note 1 - Motion filed by AVP Arora International, Inc. on 03/09/2017 Conf# 106247,

Proceeding: A1301016; A1303005; A1303013; A1303014; I1210013, E-filed Motion

Published 3/13/17

Note 2 - Motion filed by AVP Arora International, Inc. on 03/09/2017 on 03/09/2017 Conf# 106247 (Attachment 2), Proceeding: A1301016; A1303005; A1303013; A1303014; I1210013, E-filed Motion, Published 3/13/17

Note 3 - Response filed by Southern California Edison Company on 03/16/2017

Conf# 106452, Proceeding: A1301016; A1303005; A1303013; A1303014; I1210013,

E-filed Motion, Published 3/17/17

Note 4 - Boguslaw Olech, P.E., Southern California Edison Company & Tomoyuki Inoue, Mitsubishi Heavy Industries. This article was based on a paper published at ICAPP 2011, 2-5 May 2011, Nice, France, paper 11330. The authors stated, "Even though all design and fabrication challenges were addressed during manufacturing, it was not known if the as-designed and fabricated RSGs would eventually perform as specified. To verify this, the RSGs were functionally tested after installation in the plant after unit re-start from the replacement outage. The authors wish to acknowledge all Edison and MHI personnel involved in the SONGS steam generator replacement project for their efforts to make this project a success." AVP/DAB Table 1 calculation confirms that SONGS steam generator replacement project was a success. SCE operated the failed San Onofre nuclear power plant Unit 3 replacement steam generators outside the functional tested and accepted limits for pressure and temperature for higher profits, causing the radiation leak

that shut down the facility for good in 2012.