Compilation of Recent CEP Communications
12/14/18 to 1/31/19

Update from Tom Palmisano on Fuel Transfer Operations at SONGS – January 2019

From: Lorraine Quinn Sandstrom
Sent: Friday, January 18, 2019 3:57 PM
To: Bill Horn; Captain Mel Vernon; Daniel T. Stetson; David G. Victor; Donna Boston; Garry Brown; Jim Leach; Jerry Kern; Marni Magda; Martha McNicholas; Paul Wyatt; Rich Haydon; Sergio Farias; Supervisor Lisa Bartlett; Steve Swartz; Ted Quinn; Tom Caughlan; Val Macedo
Cc: Julie C Holt; KELLI GALLION; Kevin Walker; Larry Rannals; Liese Mosher; Lindsay Stigall; Lorraine Quinn Sandstrom; Manuel Camargo; Marisol Eaton (SD County); Mike Rose (Dana Point); Mike Sappingfield; Steve Carlson (UCSD); Tanya Flink; Tom Palmisano; Victor Cao (OC); John Dobken; ALBERT BATES; Doug Bauder
Subject: Update from Tom Palmisano on Fuel Transfer Operations at SONGS - January 2019

TRANSMITTED ON BEHALF OF TOM PALMISANO

Update from Tom Palmisano on Fuel Transfer Operations at the San Onofre Nuclear Generating Station – January 2019

Much has happened since I last wrote you to update our progress on re-starting fuel transfer operations (FTO) following the Aug. 3 canister downloading event at the San Onofre nuclear plant. I am writing you again because the weeks ahead promise to be filled with activity and milestones on several fronts as we move closer to re-starting FTO.

Canister-downloading operations at San Onofre remain on hold and will resume only after we are satisfied that our team has successfully demonstrated fuel transfer can proceed utilizing the improved procedures, training and technology, and the NRC has an opportunity to inspect practice runs and has reviewed re-start plans. Following that, we will notify CEP members and the public when we are ready to begin.

At the Nov. 29 CEP meeting, I outlined the significant changes we've made to our fuel transfer operations that will help us be successful. We have been working through causal analyses and corrective actions, and we've spent the last several weeks conducting dry runs, fine-tuning procedures, and working toward re-starting FTO.

Recall that we formed an Independent Readiness Assessment Team to help challenge our readiness. Last week, the independent team affirmed our progress has been meaningful and substantial. The team observed dry runs and concluded that our enhanced procedures are sound, training for our teams has been thorough and our new technology and alarms are working as planned. They believe we are ready to move forward with an NRC follow-up inspection. We are currently working with the NRC to establish dates in the near future. That will be our next milestone.

I will provide further updates to you in the weeks ahead as we complete the NRC inspections and prepare to resume FTO.

Predecisional Enforcement Conference (PEC)

On Jan. 24 a team from SONGS will travel to NRC Region IV headquarters in Arlington, Texas to provide additional information regarding the two apparent violations we received following the Aug. 3 incident. The NRC offered SCE a choice between a PEC and mediation through a process called Alternative Dispute Resolution (ADR). Either path would allow SCE an opportunity to present additional information, such as corrective actions implemented. However, SCE chose the PEC specifically because of its opportunity, through a meeting open to the public, for a more transparent process. The ADR would not include such a public meeting.

The PEC will be available for viewing online. More information is available here. This is an important opportunity for SCE to demonstrate how we've responded to the challenge presented to us on Aug. 3.

Tom Palmisano
Vice President, External Engagement
San Onofre Nuclear Generating Station

Attachment #1 - Notice of Predecisional Enforcement Conference with Southern California Edison Company, issued January 10, 2019

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Nuclear Regulatory Commission (NRC) Related Communications

NRC Atomic Safety and Licensing Board Holds Oral Arguments in Albuquerque on Holtec Spent Fuel Storage Application

From: Ted Quinn
Sent: Saturday, January 12, 2019 5:28 PM
To: David G. Victor; Manuel Camargo; John Dobken; Tom Palmisano; Daniel T. Stetson; Jerry Kern
Cc: Ted Quinn
Subject: (External): FW: Subject: NRC Atomic Safety and Licensing Board to Hold Oral Arguments in Albuquerque on Holtec Spent Fuel Storage Application

Making sure you see this.

On Fri, Jan 11, 2019 at 2:53 PM Mark Miller wrote:
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NRC NEWS
Office of Public Affairs, Headquarters
Washington, DC. 20555-0001
www.nrc.gov ■ opa.resource@nrc.gov

No: 19-003
CONTACT: David McIntyre, 301-415-8200

January 11, 2019

NRC Atomic Safety and Licensing Board to Hold Oral Arguments in Albuquerque on Holtec Spent Fuel Storage Application

A Nuclear Regulatory Commission Atomic Safety and Licensing Board will hear oral arguments in Albuquerque, N.M., in late January on petitions to hold an adjudicatory hearing concerning an application by Holtec International to construct and operate a consolidated interim spent fuel storage facility in the state.

The arguments will be heard Jan. 23 beginning at 9 a.m., and, if necessary, Jan. 24, at the State Bar of New Mexico, 5121 Masthead St. NE, in Albuquerque. The arguments will address the standing of petitioners and the admissibility of their proposed contentions. The three administrative judges on the Board will hear arguments from counsel for the following eight groups: Beyond Nuclear; Sierra Club; Alliance for Environmental Strategies; a coalition of Don't Waste Michigan, Citizens' Environmental Coalition, Citizens for Alternatives to Chemical Contamination, Nuclear Energy Information Service, Public Citizen, San Luis Obispo Mothers for Peace, and Nuclear Issues Study Group; NAC International; Fasken Land and Minerals and Permian Basin Land and Royalty Owners; Holtec International; and the NRC staff.

The Board will also reserve time for comments from a single representative from each of five interested local government petitioners: the Eddy-Lea Energy Alliance, the city of Carlsbad, Lea County, Eddy County, and the city of Hobbs.

The hearings will be open to the public. Signs, banners, posters, demonstrations and displays will not be permitted by NRC policy.

The Board is composed of three administrative judges from the NRC's Atomic Safety and Licensing Board Panel. Boards may conduct adjudicative hearings on major licensing actions by the NRC, and are independent of the NRC staff. A Board's rulings may be appealed to the Commission, the five-member body that sets NRC policy.

Best regards,
Ted Quinn, ISA Fellow
ANS Past President
IEC SC45A WGA9 Convenor
President, Technology Resource
http://www.technology-resources.com/
(949) 632-1369

No Attachment
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NRC Event Report Regarding SONGS Spent Fuel Transfer Vehicle Seismic Analysis Limits

From: Manuel Camargo
Sent: Friday, December 21, 2018 7:52 AM
To: Bill Horn; Captain Mel Vernon; Daniel T. Stetson; David G. Victor; Donna Boston; Garry Brown; Jim

Leach; Jerry Kern; Marni Magda; Martha McNicholas; Paul Wyatt Rich Haydon; Sergio Farias; Supervisor Lisa Bartlett; Steve Swartz; Ted Quinn; Tom Caughlan; Val Macedo
Cc: Julie C Holt; KELLI GALLION; Kevin Walker; Larry Rannals; Liese Mosher; Lindsay Stigall; Lorraine Quinn Sandstrom; Manuel Camargo; Marisol Eaton (SD County); Mike Rose (Dana Point); Mike Sappingfield; Steve Carlson (UCSD); Tanya Flink; Tom Palmisano; Victor Cao (OC); Doug Bauder; ALBERT BATES; John Dobken; MARK MORGAN; JIM PEATTIE JR
Subject: Report to NRC

Dear CEP Members,

I write to make you aware that SCE has notified the NRC through an event report (available here) about an issue associated with the vehicle used to transport spent nuclear fuel to the ISFSI at the San Onofre nuclear plant.

As the spent fuel transport vehicle is driven to the ISFSI, it passes various stationary objects, such as light and fence posts. The vehicle must maintain the proper center of gravity, as well as a certain distance from those objects so they don't become a hazard should a significant seismic event occur at the moment when passing those objects. During our review SCE found that in some instances the vehicle was closer to the stationary objects than transfer procedures allow. However, SCE's preliminary analysis indicates the hazard potential is fully mitigated by the design features of this vehicle, a large hydraulic crawler.

While the San Onofre team continues to analyze this issue, out of an abundance of caution SCE decided to notify the NRC now, and follow-up with additional information at a later date.

As stated in the notification, no seismic event occurred during fuel transfer operations and all 29 spent fuel canisters were successfully transferred.

Recall the transfer of spent nuclear fuel from pools to dry cask storage has been on hold since the Aug. 3, 2018 canister downloading event. Transfers will resume only after SCE is satisfied that our team has successfully demonstrated fuel transfer can proceed utilizing the new procedures, training and technology, and the NRC has an opportunity to inspect practice runs and has reviewed re-start plans.

Let me know if you have questions.

Best regards,

Manuel

Manuel C. Camargo Jr.
Principal Manager, Strategic Planning & Stakeholder Engagement
SONGS Decommissioning
Southern California Edison
www.SONGScommunity.com

No Attachment - Use link in this document to access NRC Website and Event Report on Dec. 21, 2018
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SCE Statement Re: Coast News Group Article – Rep. Mike Levin launches San Onofre Task Force

From: Manuel Camargo
Sent: Friday, January 25, 2019 3:49 PM
To: Bill Horn; Captain Mel Vernon; Daniel T. Stetson; David G. Victor; Donna Boston; Garr Brown; Jim Leach; Jerry Kern; Marni Magda; Martha McNicholas; Paul Wyatt; Rich Haydon; Sergio Farias; Supervisor Lisa Bartlett; Steve Swartz; Ted Quinn; Tom Caughlan; Val Macedo
Cc: Julie C Holt; KELLI GALLION; Kevin Walker; Larry Rannals; Liese Mosher; Lindsay Stigall; Lorraine Quinn Sandstrom; Marisol Eaton (SD County); Mike Rose (Dana Point; Mike Sappingfield; Steve Carlson (UCSD); Tanya Flink; Tom Palmisano; Victor Cao (OC); John Dobken; Doug Bauder; Amy F Pressler; R.O. Nichols
Subject: New Task Force and Congressman Levin

Good afternoon CEP Members,

Earlier today, the Coast News Group published a story about a task force announced by newly elected Congressman Mike Levin to address SONGS decommissioning. Below is a statement that we shared with the Coast News Group and other media outlets today. We welcome Rep. Levin to partner with the CEP. The statement is provided for your awareness.

https://www.thecoastnews.com/rep-mike-levin-task-force-to-address-san-onofre-safety-challenges/

> Southern California Edison welcomes Congressman Levin's interest in the issues surrounding the long-term storage of spent nuclear fuel. The congressman and SCE share common ground in a desire to have the spent fuel at the San Onofre nuclear plant moved to a permanent geologic repository or a consolidated interim storage site. Any option to move the spent fuel takes action by the federal government to approve such a site, an effort that is now decades behind schedule. Achieving a long-term storage solution requires working together in the timeliest and most efficient manner.
>
> The Community Engagement Panel was chartered in 2014 specifically to advise SCE on the issues of spent nuclear fuel storage and decommissioning of the plant, and to ensure stakeholders and the public have a voice in the process. The independent San Onofre CEP has been recognized as a best practice panel and an effective forum to examine important topics, provide information from subject matter experts, and answer questions from the public. SCE has accepted and acted upon suggestions from community members through the CEP process and looks forward to continuing to be responsive to community needs through this venue.
>
> The CEP is an acknowledged, credible body. In September of 2018, CEP Chair David Victor testified before the U.S. House Oversight & Government Reform Subcommittee on Interior, Energy & Environment. Just this week, the Los Angeles Times published an op-ed written by the volunteer CEP officers urging Congress to take action on off-site storage of spent fuel.

> We welcome Rep. Levin to work with the Community Engagement Panel on his ideas about solving long-term spent nuclear fuel storage issues, and explore ways we can partner on our shared goals. Hopefully together, all stakeholders can collaborate to accelerate national efforts to approve and complete spent fuel storage alternatives.

Let me know if you have questions.

Manuel

Manuel C. Camargo Jr.
Principal Manager, Strategic Planning & Stakeholder Engagement
SONGS Decommissioning
Southern California Edison
www.SONGScommunity.com

Attachment #2 - SCE Statement Re: Coast News Group Article – Rep. Mike Levin launches San Onofre Task Force, January 25, 2019

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David Victor's Letters to the CEP:

SONGS Correcting the Record

From: Manuel Camargo
Sent: Tuesday, January 15, 2019 5:08 PM
To: Bill Horn; Captain Mel Vernon; Daniel T. Stetson; David G. Victor; Donna Boston; Garry Brown; Jim Leach; Jerry Kern; Marni Magda; Martha McNicholas; Paul Wyatt; Rich Haydon; Sergio Farias; Supervisor Lisa Bartlett; Steve Swartz; Ted Quinn; Tom Caughlan; Val Macedo
Cc: Julie C Holt; KELLI GALLION; Kevin Walker; Larry Rannals; Liese Mosher; Lindsay Stigall; Lorraine Quinn Sandstrom; Manuel Camargo; Marisol Eaton (SD County); Mike Rose (Dana Point); Mike Sappingfield; Steve Carlson (UCSD); Tanya Flink; Tom Palmisano; Victor Cao (OC); John Dobken; ALBERT BATES; Doug Bauder
Subject: SONGS and Correcting the Record

TRANSMITTED ON BEHALF OF DAVID VICTOR

Dear CEP Members

I hope the New Year is treating you well.

The last two weeks have seen a lot of news about SONGS, along with a series of sensationalist studies and stories that have very little factual basis. I appreciate the need for everyone to vent their opinion, but I do worry a lot when those opinions are presented in the guise of scientific analysis yet have no technical grounding whatsoever.

To that end, I write about three things. First, two weeks ago KPBS ran a story about the dangers of the canisters at SONGS, including claims that the canisters were irreparably flawed. That story suggested that the best course of action would be to stop any further fuel transfer and go back to square 1. That would be a horrible policy decision. I was invited on KPBS to help set the record straight and gave a far-ranging interview over about 15 minutes. Here is a link.
Second, last week the Union Tribune ran a story about a new pair of Samuel Lawrence Foundation studies claiming that the canisters were flawed and suggesting that a Fukushima-like event could occur at SONGS. The Samuel Lawrence crew even went so far as to hire an economics research group to analyze the costs of a Fukushima (or Chernobyl) in Southern California. I was stunned since there is no physical basis for that scenario—Fukushima and Chernobyl were operational reactors. SONGS is not, and thus there is no reactor core to go critical or melt down or explode. Many other experts were also stunned that the Union Tribune would publish such a story without vetting the analysis with actual experts, and the next day the Tribune did run a much more balanced and accurate story. Here is a link.

Third, Dan, Jerry and I are mindful that people have raised questions about the "worst case" scenarios—if a canister dropped, would it breach? If the canisters are being scratched as they are lowered into the ISFSI, which we have learned is normal, will these scratches compromise the canister? How quickly will the protective chromium oxide coating (which forms on stainless steel—it is one of the reasons stainless steel is the metal of choice for these canisters) reform after scratching? As you know, the CEP has requested that the non-proprietary analyses of a canister drop and scratching be made public—and they are posted, per our request, here and here. In addition, I have been concerned that the technical details needed to understand these studies are still too thin and thus have requested that still more information be released—for example, information that would help us understand why the scratch analysis has robustly analyzed the worst possible scratches that could occur. Edison is now getting that information into the public domain. More detail on the scratch analysis is now available here. I expect more information on the drop analysis as well, and will share that. Several people, myself included, have also asked the NRC to release a letter confirming their own review of the scratch and drop analyses.

These are difficult but important topics. The facts matter, and I will do all that I can to make sure we have the most useful facts on hand. As always, if there is anything more or different that we can do please help let us know.

Best

David

Attachment: #3 - KPBS Interview: Edison Community Engagement Panel Chair Addresses Safety Concerns at San Onofre by Alison St. John, Wednesday, January 9, 2019 (use link in this document to listen to the interview)

Attachment: #4 - San Diego Tribune Article - No Credible threat of radiation leak outside San Onofre, regulators, utility officials say, by Jeff McDonald, January 9, 2019

Attachment #5 - Non-proprietary Summary of the Holtec Proprietary MPC-37 Drop Analysis in Holtec Report Number HI-2188261 Rev. 3, November 16, 2018

Attachment #6 - Evaluation of Downloading Effects on Multi-Purpose Canister Integrity, prepared by Southern California Edison, December 12, 2018

Attachment #7 - Additional information regarding Southern California Edison's analysis of scratches to Multipurpose Canisters (MPCs) during the downloading process, Jan. 13, 2019 FINAL
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SONGS CEP New Public Engagement Efforts and Status of Canister Downloading Incident

Attachment #8 - Letter to SONGS CEP - New public engagement efforts and status of canister downloading incident, December 14, 2018
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Industry Articles Related to Nuclear Waste

Forbes Article – Can We Drill A Hole Deep Enough For Our Nuclear Waste?

From: Ted Quinn
Date: Thursday, January 31, 2019 at 10:14 AM
To: David G. Victor, Manuel Camargo, John Dobken, Tom Palmisano, Dan Stetson, Jerry Kern
Cc: Ted Quinn
Subject: FW: Can We Drill A Hole Deep Enough For Our Nuclear Waste?

Very good writer for Forbes and others ---- science writer.

Best regards,

Ted Quinn, ISA Fellow
ANS Past President
IEC SC45A WGA9 Convenor
President, Technology Resource
http://www.technology-resources.com/
(949) 632-1369

From: Jim Conca
Sent: Thursday, January 31, 2019 9:48 AM
To: Tom Isaacs
Cc: Troy Latta
Subject: Can We Drill A Hole Deep Enough For Our Nuclear Waste?

Can We Drill A Hole Deep Enough For Our Nuclear Waste?

Deep Isolation takes advantage of recently developed fracking technologies to place nuclear waste in a series of two-mile-long tunnels, a mile below the Earth's

surface, where they'll be surrounded by a very tight rock called shale. And their recent field demonstration worked just fine.

https://www.forbes.com/sites/jamesconca/2019/01/31/can-we-drill-a-hole-deep-enough-for-our-nuclear-waste/#1596916168a7

Attachment #9 - Forbes Article – Can We Drill A Hole Deep Enough For Our Nuclear Waste? By James Conca, January 31, 2019

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L.A. Times Op-Ed by David Victor, Dan Stetson and Jerry Kern – Nuclear waste has been piling up across America with nowhere to go. Congress needs to acts

From: Manuel Camargo
Sent: Thursday, January 24, 2019 7:18 AM
To: Bill Horn; Captain Mel Vernon; Daniel T. Stetson; David G. Victor; Donna Boston; Garry Brown; Jim Leach; Jerry Kern; Marni Magda; Martha McNicholas; Paul Wyatt; Rich Haydon; Sergio Farias; Supervisor Lisa Bartlett; Steve Swartz; Ted Quinn; Tom Caughlan; Val Macedo
Cc: Julie C Holt; KELLI GALLION; Kevin Walker; Larry Rannals; Liese Mosher; Lindsay Stigall; Lorraine Quinn Sandstrom; Marisol Eaton (SD County); Mike Rose (Dana Point); Mike Sappingfield; Steve Carlson (UCSD); Tanya Flink; Tom Palmisano; Victor Cao (OC); John Dobken; Doug Bauder; Amy F Pressler; R.O. Nichols
Subject: OpEd by David, Dan, and Jerry in LA Times Today

Good morning CEP members,

Sharing an OpEd in today's *Los Angeles Times* that David Victor, Dan Stetson, and Jerry Kern wrote that urges congressional action to remove the used nuclear fuel from sites such as San Onofre. Feel free to share the piece with your contacts.

https://www.latimes.com/opinion/op-ed/la-oe-victor-stetson-kern-san-onofre-20190124-story.html

Thanks to David, Dan, and Jerry for their work on this important piece.

Manuel

Manuel C. Camargo Jr.
Principal Manager, Strategic Planning & Stakeholder Engagement
SONGS Decommissioning
Southern California Edison
www.SONGScommunity.com

Attachment #10 – L.A. Times OpEd – Nuclear Waste has been piling up across America with nowhere to go. Congress needs to act by David G. Victor, Dan Stetson, and Jerry Kern, January 24, 2019

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Bulletin of the Atomic Scientists Article: What to do with used nuclear fuel, from Illinois to California by Jeff Terry, December 14, 2018

From: David G. Victor
Sent: Friday, December 21, 2018 8:03 AM
To: Manuel Camargo
Cc: Daniel T. Stetson; Jerry Kern
Subject: (External): For next email circular

https://thebulletin.org/2018/12/what-to-do-with-used-nuclear-fuel-from-illinois-to-california/?utm_source=Bulletin%20Newsletter&utm_medium=iContact%20email&utm_campaign=UnusedNuclearFuel_12142018

**Sent from limited typing device

Attachment #11 - Bulletin of the Atomic Scientists – What to do with used nuclear fuel, from Illinois to California by Jeff Terry, December 14, 2018