18 August 2020

BY EMAIL

Dear Chairman Svinicki and Regional Administrator Morris,

As you know, the communities surrounding the San Onofre Generating Station (SONGS) are highly active and focused on the ongoing stewardship of the plant. That stewardship hinges on many different factors, including various rulemakings and actions by your Commission.

We are the leadership of the SONGS Community Engagement Panel, a volunteer organization established by the licensee to help ensure a more open two-way line of communication between the communities affected by the closure of SONGS and the operator of the plant and its contractors. Today we write on two fronts.

First, there remains substantial and growing attention to the security, monitoring and management of the ISFSI-only license. Some of these issues concern the need for political action to alter federal law, such as will be needed to make interim storage a practical reality. Some of these concern public-facing monitoring and robust articulation of “defense in depth” for the ISFSI. The SONGS site now has a more visible and extensive program in this area than perhaps any site in the country, and all the materials from these meetings and CEP engagement are available at songscommunity.com. In May, we note in particular, that we devoted an entire meeting to “outlier events” at the ISFSI—in particular, terrorism-related threats. The background materials for that meeting identified a full range of threats, engaged some of the nation’s leading experts in assessing priorities related to those threats, and assembled a large and growing database of materials related to outlier events at ISFSI facilities.

Second, as part of the May 2020 meeting there was considerable attention to NRC’s rulemaking with regard to ISFSI security (rooted in policy paper SECY-07-0148). This arose because the SONGS site already has adopted provisions that go above and beyond the base level security requirements for an ISFSI-only site, and there is keen community interest in how NRC is seeing these issues evolve more generally. (A paper on the “above and beyond” measures will be circulated to the CEP next week and we are happy to send you a copy.) However, it is our understanding that rulemaking on additional ISFSI security measures was suspended (on staff recommendation) in 2019. Is that still the case? Does the Commission have an updated plan
for ISFSI security rulemaking and/or do you believe that any security have been otherwise addressed?

Yours Sincerely,

David Victor, SONGS CEP Chair
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