Compilation of Email Communications
3/15/21 to 6/11/21

Final Strategic Plan

From: David G. Victor
Sent: Monday, March 15, 2021 2:33 PM
To: Manuel Camargo; Daniel T. Stetson; Martha McNicholas; Supervisor Lisa Bartlett; Michelle Anderson; Garry Brown; Jim Desmond (SD County Supervisor); Mark Riddlebarger; Rob Howard; Sam Jammal; Valentine Macedo; Marni Magda; Ted Quinn; John Taylor (SJC City Council); Captain Mel Vernon; Chris Duncan; Michael Villar
Cc: Doug Bauder; Lorraine Quinn Sandstrom
Subject: (External):Re: Final Strategic Plan and Updated Slide Deck for CEP Meeting

***** EXTERNAL EMAIL - Use caution when opening links or attachments *****
Dear CEP members

The Action, Strategic and Conceptual Transportation plants represent a substantial step forward. I have had the chance now to read them fully; they are impressive in detail and nuance and sobering in the implications for federal policy shifts (which seem to be essential).

If you are short on time, I recommend reading Volume 1 (which is short and focused on SCE's response) and the executive summary for volume 2 (which tees up the large strategic issues about private, federal and hybrid options). The transportation issues (volume 3) are important and far from trivial, but they seem likely to fall into place if all the other stars align.

I look forward to the meeting Thursday

David

From: Manuel Camargo
Date: Monday, March 15, 2021 at 10:37 AM
To: David G. Victor, Dan Stetson, Martha McNicholas, Supervisor Lisa Bartlett, Michelle Anderson, Garry Brown, Jim Desmond (SD County Supervisor), Mark Riddlebarger, Rob Howard, Sam Jammal, Valentine Macedo, Marni Magda, Ted Quinn, John Taylor (SJC City Council), Captain Mel Vernon, Chris Duncan, Michael Villar
Cc: Doug Bauder, Lorraine Sandstrom
Subject: Final Strategic Plan and Updated Slide Deck for CEP Meeting

Hello CEP Members,

The Action, Strategic, and Conceptual Transportation Plans have been finalized and posted to the SONGS website, which is available here. We issued a news release this morning to announce the plans and introduce our new coalition. The news release is available here and a one-page "at-a-glance" summary of the plans is available here. Please feel free to share this material with others in your networks.

We also posted an updated slide deck to the SONGS web page for our CEP meeting on Thursday and the presentation is available at right under "meeting materials" here.

Best regards,

Manuel

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

No attachment. Direct links within text.
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David Victor Responds to Letter by Paul Blanch

From: David G. Victor
Sent: Wednesday, March 31, 2021 3:15 PM
To: Paul Blanch
Cc: Dan Stetson, Martha McNicholas, Lisa Bartlett, Garry Brown, Jim Desmond, Chris Duncan, Rob Howard, Sam Jammal, Marni Magda, Ted Quinn, John Taylor, Captain Mel Vernon, Michael Villar, Lorraine Quinn Sandstrom, Manuel Camargo
Subject: (External):Re: Letter to David Victor Chair San Onofre CEP

*** EXTERNAL EMAIL - Use caution when opening links or attachments ***
Dear Mr. Blanch

Thanks for your note. By copy I ask Lorraine Sandstrom and Manuel Camargo to including this in the next circular

Requests to speak in the public comment period are not made through the chat—they are made through advance email and online signup, per procedures that have been very well articulated and repeatedly.

David Victor, PhD

From: Paul Blanch
Date: Wednesday, March 31, 2021 at 3:06 PM
To: David G. Victor
Cc: Paul M. Blanch, Dan Stetson, Martha McNicholas, Lisa Bartlett, Garry Brown, Jim Desmond, Chris Duncan, Rob Howard, Sam Jammal, Marni Magda, Ted Quinn, John Taylor, Captain Mel Vernon, Michael Villar
Subject: Letter to David Victor Chair San Onofre CEP

Mr. Victor:

Per your invite to write to you during the recent CEP meeting. please see enclosed letter to you as Chair of the San Onofre CEP. Please feel to share with other panel members.
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Compilation of Email Communications
3/15/21 to 6/11/21

Paul M. Blanch PE

Energy Consultant

Wednesday, March 31, 2021

Dr. David G. Victor
Chair, SONGS Community Engagement Panel
UC San Diego School of Global Policy & Strategy
RBC #1405, 9500 Gilman Dr. #0519
La Jolla, California 92093-0519

Dear Dr. Victor and the SONGS Community Engagement Panel (CEP) members:

I am responding to your kind invitation to write you regarding basic unanswered safety questions on behalf Public Watchdogs.

You will recall that prior to the SONGS Community Engagement Panel meeting on March 18, 2021, I sent three questions in advance using the posted links in the slide shown at left below. My understanding was that these questions and comments would be addressed first. The questions were passed on to SCE and then conveniently "ducked" without any truthful response.



(View the this slide on page 4, at https://bit.ly/31pEUkD)	Statement at https://bit.ly/3cvr1YP, minute 1:10:52 of original recording.

Near the end of the meeting, at Minute 1:10:52 of the proceedings, you stated:

> "*I saw a bunch of comments about Paul Blanch not being able to speak. When he submitted his questions in advance, he said he didn't want to speak, so I would urge Mr. Blanch to send me a letter about his concerns, I'll make sure that gets addressed. And I'll also make sure that he's on the list for the next meeting*."

I would appreciate your source of what I believe is the false information you stated in this video. At no time did I request that I not be asked to speak. My hand was raised during the public comment period. In addition, I pleaded in the "chat room" that I wanted to speak. During the meeting I also called Charles Langley and asked him to alert the CEP in the "chat room" that I was anxious to correct the false information being put forward by Edison.

Mr. Langley's chat room requests were ignored, along with the requests of at least four other members of the public who were asking that I be allowed to address the CEP.

Equally troubling, John Dobken, Southern California Edison's media relations officer, posted a link to derogatory article that he has written about Public Watchdogs and myself in the comments section. In my opinion, this was an intentional effort by Mr. Dobken to conceal the large number of chat room requests to the Community Engagement Panel. This action alone by Mr. Dobken, confirmed that Edison was fully aware of my requests and failed to inform the CEP of my desperate desire to correct

the false information communicated to the CEP and the public.

I am alerting you to these events, because in addition to Edison's established practice of lying to the public. These are the sort of shameless public relations shenanigans that have deepened public mistrust of Southern California Edison, and the dedicated public servants who serve on the CEP.

Understandably, the Community Engagement Panel deflected my questions to Southern California Edison, which failed to provide a logical, coherent response. For example, when Mr. Bauder passed Question B to his staff, the staff's answer had nothing to do with the question. Further, in response to questions A and B, Mr. Bauder simply stated that canister failure was not credible.

For the record, these are the questions I asked prior to the CEP meeting:

> **Question A:** The words "not credible" appear in numerous SCE docketed communication with the NRC and now with the CEC. How does SCE define "not credible" and for what time period is this claim valid?
>
> **Question B:** The Technical Specifications require equipment to be readily available to recover from a flooding event within 8 hours. I have a copy of the ISFSI Emergency Plan for SONGS (FOIA 2021-000114) but it does not mention any flooding recovery equipment such as pumps, water supplies, high temperature hoses, radioactive liquid disposal and training to recover from the potential flooding of 73 canisters.
>
> **Question C:** If the undefined "not credible"flooding event occurs, are SONGS personnel trained to respond to a criticality event?

The reason for these questions: The licensee has submitted its Final Safety Analysis Report (FSAR) and its Certificate of Compliance (CoC) for the ISFSI. The NRC approved these documents. Within these documents the licensee has stated numerous times that failure of the Holtec canisters is "Not Credible." This "not credible" determination is in response to the integrity requirement of 10 CFR 72.236(l), which allows Southern California Edison to dodge any and all of the requirements needed to assure integrity. Further, the NRC has formally declined to answer these questions.

Accordingly, I request that the Community Engagement panel secure competent answers to the following questions.

QUESTION 1: How does the licensee define "Not Credible" and what analysis has been conducted to support this statement?

Reason for this question: The devious use of the term "not credible" without any regulatory definition allows Edison/Holtec and the NRC to avoid addressing the design requirements of 10 CFR 72.122 and 10 CFR 72.236 and all requirements for Aging Management.

QUESTION 2: Does the licensee have equipment such as pumps, special high temperature hoses and disposal provisions for radioactive water and pure water supplies, readily available? Is there also sufficient time to prevent fuel damage that will occur within either 8 or 32 hours according to the Final Safety Analysis Report (FSAR)?

Reason for this question: In the FSAR Technical Specifications (TS), Southern California Edison discusses recovery from an analyzed flooding event as involving the insertion of some type of suction device to remove water and debris. This procedure is allegedly discussed in the site emergency plan.

QUESTION 3: What is the radiological impact of an inadvertent criticality in the event of flooding and loss of canister integrity due to this flooding event?

Reason for this question: In an official email from the NRC to Tom Palmisano RE: "Criticality impact of thin-wall dry storage canisters" sent Thursday, December 21, 2017, at 2:15:00 PM the NRC stated:

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

After a detailed review of the published video and the deceptive information being conveyed to the public, you should be very concerned about your continued leadership of the panel that "is intended to serve as a conduit for public information and encourage community involvement and communication with the SONGS Co-owners on matters related to SONGS decommissioning." My concern is your independence from Edison is questionable.

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I have been a member of decommissioning panels and/or conducted formal presentations before these panels. None of these panels were financed by the utility. All of them in contrast to the CEP, had some type of formal oversight from State Regulatory bodies.

I am concerned that the CEP is not truly "independent." The Community Engagement Panel is 100% funded by Southern California Edison. Aside from a handful of elected officials, the panel members are hand-selected by Edison using a charter written by Edison. This structure makes it impossible for the CEP to exercise truly independent oversight of decommissioning activities at San Onofre.

My goal is similar to the of the CEP charter. I want to assure that the San Onofre spent fuel is consistent in meeting the NRC's stated goal of "Protecting the Public and the Environment."

I believe it to be reasonable to inform members of the risks presented by the spent fuel and regulatory compliance identified in 10 CFR 72 and 10 CFR 71.

I am more than willing to make a presentation to the CEP at any time to provide my perspective of the risks associated with the storage of the spent fuel at San Onofre. On March 18, 2021, I along with Public Watchdogs, made a formal presentation to the NRC about San Onofre risks. I am also willing to present this vital information to the CEP should there be any interest.

I am formally requesting finally an apology from you and some assurance the CEP will commence operating as an independent panel.

I look forward to your prompt response.

Sincerely,



Paul Blanch

135 Hyde Rd.

West Hartford, CT 06117

[redacted]

[redacted]

CC: Daniel T. Stetson President and Chief Executive Officer, Ocean Institute
Martha McNicholas, Capistrano Unified School District Board of Trustees
Michelle Anderson, Orange County Sheriff's Department
The Honorable Lisa Bartlett, Fifth District Supervisor, County of Orange
Garry Brown, President and CEO, Orange County Coastkeeper
The Honorable Jim Desmond, San Diego County Board of Supervisors
The Honorable Chris Duncan, City of San Clemente
Rob Howard, President, Utility Workers Union of America, Local 246, AFL-CIO
Sam Jammal, community liaison officer Marine Corps Installation West
Valentine "Val" Macedo, Laborers Intl. Union of North America - Local 89
Marni Magda Community College Professor, ret.
Edward "Ted" Quinn, President, Technology Resources, Consulting and Nuclear Industry Mgmt.
Mark Riddlebarger, Emergency Manager, California State Parks, Orange Coast District
The Honorable John Taylor, former Mayor of San Juan Capistrano
Captain Mel Vernon San Luis Rey Band of Mission Indians
The Honorable Michael Villar. Council Member City of Dana Point

Paul Blanch
[redacted]

[redacted]

No attachment. Direct links within text.
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Letter from Marine Corps Regarding Strategic Plan

From: Manuel Camargo
Sent: Thursday, April 8, 2021 7:38 PM
To: Duncan, Chris; Dan Stetson (Nicholas Endowment); David Victor (UCSD); Garry Brown; Jim Desmond (SD County Supervisor); John Taylor (SJC City Council); Supervisor Lisa Bartlett; Mark Riddlebarger; Marni Magda; Martha McNicholas; Captain Mel Vernon; Michael Villar; Michelle Anderson; Mike Balsamo; Rob Howard; Sam Jammal; Ted Quinn; Valentine Macedo
Cc: Doug Woodyard (OC); Larry Rannals; Ken Shultz; Kristal Jabara; Ferguson, Laura Ferguson; Mike Sappingfield; Doug Bauder - Southern CA Edison; 'Ronald Pontes; Liese Mosher; Amy F Pressler; James Peterson
Subject: FYI: Letter from Marine Corps Regarding Strategic Plan

Hello Community Engagement Panel,

At the request of Marine Corps Brigadier General Dan Conley, I write to share with the CEP members and alternates a letter he wrote to SCE President & CEO Kevin Payne. The letter makes clear that the perpetual storage of spent fuel on Camp Pendleton is inconsistent with the Marine Corps' national defense mission and that it will not entertain proposals to relocate spent fuel elsewhere on the installation.

The letter also is posted to the SONGS community web page associated with the Strategic Plan to relocate spent fuel to an offsite facility.

Sincerely,

Manuel

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

No attachment. Direct links within text.
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SONGS Spent Fuel Pools and Legal Proceedings

From: Manuel Camargo <Manuel.Camargo@sce.com>
Sent: Thursday, May 27, 2021 3:59 PM
To: Chris Duncan; Daniel T. Stetson; David G. Victor; Garry Brown; Jim Desmond (SD County Supervisor); John Taylor (SJC City Council); Supervisor Lisa Bartlett; Mark Riddlebarger; Marni Magda; Martha McNicholas; Captain Mel Vernon; Michael Villar; Michelle Anderson; Mike Balsamo; Rob Howard; Sam Jammal; Ted Quinn; Valentine Macedo
Cc: Doug Woodyard (OC); Larry Rannals Ken Shultz; Kristal Jabara; Laura Ferguson; Mike Sappingfield; Doug Bauder; Ronald Pontes; Liese Mosher; Amy F Pressler; James Peterson; Lorraine Quinn Sandstrom; Julie Holt; John Dobken
Subject: FYI - SONGS Spent Fuel Pools and Legal Proceeding

Dear Community Engagement Panel Members,

I write to make you aware that SCE, in good faith and agreement with the Samuel Lawrence Foundation, will adhere to its current decommissioning schedule and not perform further work on the spent fuel pools at SONGS for approximately 90 days. By that time, the Los Angeles Superior Court is expected to have rendered its decision on a petition brought by the Foundation regarding the coastal development permit granted by the California Coastal Commission to SCE in 2019 for the dismantlement of SONGS, including the spent fuel pools.

This agreement allows all parties and the court to focus their respective attentions on the upcoming trial in mid-June.

The facts clearly show that the Commission was thorough in its analysis, thoughtful in its review and correct in its decision to approve the coastal development permit to safely dismantle SONGS.

After receiving the CDP, SCE and its decommissioning contractors began executing on a detailed and well-planned dismantlement schedule in February 2020. A Notice of Deconstruction was sent to the local community in January 2020 and posted to the SONGS Community website. Decommissioning of the spent fuel pools began in late July 2020, after the Coastal Commission's approval of SCE's Inspection and Maintenance Plan. These plans and intentions were discussed with the California Coastal Commission, at our CEP meetings, and shared with the news media.

We maintain a shared interest with the local communities to move forward with dismantling the plant in a safe and timely manner and restoring the SONGS site for return to the U.S. Navy.

SCE looks forward to presenting its case to the court next month.

For additional context regarding the spent fuel pools and decommissioning, please reference the web page available HERE.

Best Regards,

Manuel

Manuel C. Camargo Jr.
Principal Manager, Strategic Planning
SONGS Decommissioning

Southern California Edison
www.SONGScommunity.com

No attachment. Direct links within text.
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NRC Responds to Public Watchdog's Petition

From: Lorraine Quinn Sandstrom
Sent: Friday, June 11, 2021 2:58 PM
To: David Victor; Dan Stetson; Martha McNicholas; Michelle; Mike Balsamo; Lisa Bartlett; Garry Brown; Jim Desmond; Chris Duncan; Rob Howard; Sam Jammal; Marni Magda; Val Macedo; Ted Quinn; Mark Riddlebarger; John Taylor; Mel Vernon; Michael Villar
Cc: Laura Ferguson; Kristal Jabara; Mike Sappingfield; Ken Schultz; Doug Woodyard; Manuel Camargo
Subject: NRC Responds to Public Watchdog's Petition

Dear CEP Members,

The attached letter is from the NRC to Charles Langley. The NRC's Petition Review Board has completed its review of a Public Watchdogs petition under Section 2.206 of the Code of Federal Regulations and determined that the concerns expressed in the petition do not meet the criteria for consideration because the relevant issues have been the subject of NRC staff review. The matter is closed.

Provided for your awareness.

Thank you,
Lorraine Sandstrom
Community Affairs and Relations, Senior Specialist
Community Engagement Panel (CEP) Management and Stakeholder Engagement (AWS Bldg. D-D23)
Southern California Edison, San Onofre Nuclear Generating Station (SONGS)

Attachment #1 – NRC Responds to Public Watchdog's Petition, June 2, 2021
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