

October 16, 2025

San Onofre Nuclear Generating Station
Community Engagement Panel

Subject: Support for the Safety and Resiliency of Used Fuel Storage

Dear Members of the Community Engagement Panel (CEP):

On behalf of the Nuclear Energy Institute (NEI), I write to reaffirm the industry's commitment to the safe, secure management of used nuclear fuel. Throughout the country, used nuclear fuel is safely stored and monitored every day under rigorous U.S. Nuclear Regulatory Commission (NRC) oversight.

Each dry cask is a robust, steel-and-concrete structure designed to withstand extreme environmental conditions, while providing radiation shielding and heat dissipation without any need for power or cooling pumps. These sealed systems are so well shielded that an individual can safely stand next to a loaded cask. Nationally, more than 4,300 used-fuel canisters have been safely loaded and stored over the past four decades without incident. The NRC requires and verifies that storage meets stringent safety and security standards that it is technically feasible for these containers to continue safe storage for many decades to come.

The San Onofre Nuclear Generating Station's (SONGS) used fuel management program reflects that standard of care. The site maintains formal aging management programs consistent with NRC requirements for the TransNuclear Storage System, which evaluate aging mechanisms and ensure components continue to fulfill their safety functions through extended operation. As part of this oversight, SONGS conducted a baseline inspection in November 2021 of canisters that had been in storage for 17 and 18 years and no signs of degradation were identified. In addition, SONGS has developed an Inspection and Maintenance Program for the Holtec Storage System for the initial 20 years of service which exceeds NRC requirements. The first inspection as part of this program for the Holtec spent fuel canisters took place in March 2024. These activities, together with periodic inspections and trending, provide confidence that any anomaly would be detected and addressed well before it becomes an issue.

To that end, the commercial nuclear power industry has created an inspection framework in accordance with NRC Regulatory Guide 3.76, "Implementation of Aging Management Requirements for Spent Fuel Storage Renewals."

In order to establish what requirements may be used for the inspection of spent nuclear fuel storage and transportation containment systems, the American Society of Mechanical Engineers (ASME) developed Code Case N-860. The NRC formally adopted Code Case N-860 in Regulatory Guide 3.78.

In addition, the industry has demonstrated that, if any degradation of the canisters were to be detected, cold spray deposition technology could be deployed in-situ to stop the progression of any damage. This was a key factor in the California Coastal Commission's July 16, 2020, decision to approve San Onofre Station's Spent Fuel Inspection and Maintenance Program. ASME is currently drafting Code Case N-927, "Canister Mitigation by Cold Spray Deposition," to develop what requirements shall be applied when cold spray deposition is used to mitigate welded austenitic stainless steel spent fuel canisters from service-induced degradation. Until this code case is approved and endorsed by the NRC, use of cold spray would be in accordance with 10 CFR 72.48.

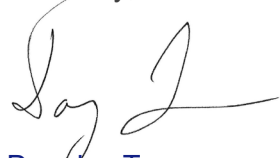
We recognize that surface conditions can draw public attention. It is important to note that cosmetic indications, such as streaks, smudges, stains, or other superficial marks from handling or the environment do not affect the structural integrity of the cask or canisters.

In addition to monitoring and maintaining the conditions of the canisters in which the fuel is contained, the industry has significant data that demonstrates that, inside the canisters, the condition of the fuel remains as intact as when it was placed into storage, even under severe conditions such as the Fukushima earthquake and tsunami. This data is summarized in EPRI technical report 3002029312, "Spent Fuel Dry Storage Cask Opening: Operational Inspections." In April of this year, the U.S. Department of Energy announced the establishment of the International Center for Spent Nuclear Fuel Research and Development to ensure that the collection and evaluation of data will continue to support all future storage needs.

While on-site storage is safe and resilient, it was never intended to be permanent. NEI continues to urge Congress and the Administration to make used-fuel disposal a national priority. Until that program is in place, current storage practices will continue to meet stringent regulatory requirements and the highest standards of stewardship.

We appreciate the CEP's sustained engagement on this topic and remain available to provide additional information or a technical briefing at the Panel's convenience.

Sincerely,



Douglas True
Sr. Vice President & Chief Nuclear Officer