

Communication Among the Public, CEP, and SCE

From: Glenn Pascall
Reply-To: Glenn Pascall
Date: Thursday, January 15, 2015 at 8:03 AM
To: "David G. Victor"
Subject: Re: a copy of your white paper

David,

It is my pleasure and privilege to transmit to you "A National Framework for Nuclear Waste Management." This White Paper attempts to bring together current thinking on three related topics:

- Best practices that in combination offer "defense in depth" to assure the safest possible storage of radioactive waste on-site at individual nuclear power plants.
- A consent-based process to identify, certify and utilize specific locations around the country as sites for consolidated interim storage of waste.
- A call to renew the study, evaluation and location of one or more long-term remote waste storage sites, also known as geologic repositories, as a matter of national policy and priority.

The first of these sections benefits greatly from your due diligence in studying and summarizing "defense in depth" issues, as you did for the CEP in a 2014 paper.

The second of these sections similarly benefits from the work of Jim Hamilton and the National Spent Fuel Collaborative.

The third section reflects insights from national nuclear experts as well as the motivating spirit provided by members of the CEP that removing waste from San Onofre is an ultimate goal that ideally would be part of the legacy of the CEP.

I hope you find the White Paper a useful contribution to the dialog on these issues and I invite you to share it in any way you deem appropriate and beneficial.

Best regards,

Glenn Pascall, Chair
San Onofre Task Force
Sierra Club Angeles Chapter

[Reference attachment: A National Framework for Nuclear Waste Management]

From: Jerry Kern
Sent: Wednesday, January 28, 2015 11:01 AM
To: david victor
Cc: CEP members
Subject: Question from my constituents

Chairman Victor and fellow CEP Members,

First of all I would like to say that last night's meeting was very productive and I commend the Chairman for keeping the meeting on topic and on task. I would also like to thank the Chair for allowing me to bring up a couple of items for the record that I would like to see addressed either as part of a future meeting or as a written response from the SONGS owner/operators.

As I stated last night, local elected officials are very accessible to the public, in fact probably the most accessible of any level of government, and in the course of our day we have frequent contact with our

constituents. The following two areas of concerns and questions came from my constituents and I feel they need to be addressed.

First is staffing/personnel

1. What is Edison's plan to make sure the local economies and workers are included in the money set aside for decommissioning. There is great concern that out of state contractors will be employed to decommission the plant and that the local work force will be excluded from the process.
2. There seems to be a rapid decline in onsite qualified maintenance staffing over the next two years and the jobs are being assigned to outside contractors. If the staffing requirements are met with current qualified staff, why are they being let go in favor of an outside contractor? There are two components to have a robust safety program: personnel and equipment. No matter how good the equipment if you do not have the personnel that are qualified and knowledgeable the safety system is not what is required for a plant of this size and complexity.

Second is the undergrounding of the storage

Concerns have been raised within the community on the below ground storage. This is a new concept to many and the proximity to the ocean, the elevation of the storage in relationship to ground water or salt water intrusion are the questions that have been raised.

1. This is a change from the current storage system. What are the benefits vs. risk with this system as compared against the current system?
2. If this system is being used elsewhere in the Unites states what is the geologic condition of those sites?
3. Has sea level rise and shoreline erosion, both short term and long term, been taken into the consideration?
4. Does the design take into consideration localized ground motion and liquefaction during a seismic event?
5. How will below ground storage be monitored/ managed and in case of a problem what is the mitigation/recovery plan?
6. What site studies are being done or have been completed by the vendor to determine seismic risk? Has there been a independent review of the process and data and who preformed that review and how current is the data? I feel this last question is vitally important to assess the seismic risk that must be accounted for before there is any long term commitment to on site storage.

Thank you for you consideration of these issues.

Jerry
Jerome M. Kern
Councilmember
City of Oceanside

[Reference attachment: Oceanside Q&A]

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This is an automated email response from Community Engagement Panel

Date Sent: 1/18/2015

First Name: Susam

Last Name: Shean

Email address:

City:

State: CA

Message: 1/18/15

Please advise regarding the scheduling of CEP meetings that will be open to the public. Email notification would be appreciated.

Thank you

From: Manuel Camargo

Sent: Monday, January 26, 2015 7:37 PM

To: 'susan.shean

Subject: FW: New CEP Message

Ms. Shean,

The San Onofre CEP has quarterly meetings that are open to the public. Our first meeting of the year will be on the evening of Tuesday, Jan. 27, in San Juan Capistrano. Click on the hyperlink below for more information on the Jan. 27 CEP meeting.

1. [Jan. 27](#)
2. April 16 (tentative)
3. July 23 (tentative)
4. Oct. 29 (tentative)

If you would like to register to automatically get updates including meeting notices, please register through our [website](#).

Sincerely,

Manuel Camargo  
SONGS Decommissioning

~~~~~  
From: Casey Thormahlen
To: nuccomm@songs.sce.com,
Date: 01/28/2015 08:30 AM
Subject: Message for the CEP

Thank you for hosting the 1/27 CEP meeting in San Juan Capistrano. I appreciated the degree of openness the panel showed and was impressed by the caliber of speakers invited, particularly Dr. Per Peterson. I understand that the CEP is specifically not supposed to address the question of whether or not we should use nuclear energy, but I fear this strict neutrality is harmful to the public good. Its inexcusable for the CEC to hold up Yucca Mountain over a potential threat to ground water in Death Valley; every day the CEC delays Yucca Mountain they're exposing us to environmental dangers orders

of magnitude greater than those posed by nuclear waste (e.g. from increased use of natural gas and coal).

During the meeting a number of wild and inaccurate claims were floated, largely uncontested. Here are some examples, as best as I can recall from my notes:

- 1) Millions of people are expected to die as a result of what happened at Fukushima
 - No one died at Fukushima and the IAEA expects no human health impact. The exclusion zone has less radiation than Denver on a clear day.
- 2) HOLTEC casks at Humboldt Bay may be undermined by 'highly corrosive' magnesium chloride
 - Magnesium chloride is a salt, similar to table salt. Its extremely benign.
- 3) The NRC lacks the technology to detect leaks in HOLTEC spent fuel casks
 - I don't see any reason why cheap radiation dosimeters would fail to detect a leak.
- 4) The on-site spent fuel storage puts the 8 million residents of Southern California at indefinite risk
 - Short of physically touching the spent fuel I don't see any risk potential.
- 5) Spent fuel storage poses a risk in a possible terrorist attack
 - Spent fuel, or even fresh LEU, would always be an inferior target or weapon compared to a common gas station.
- 6) Tritium and Carbon-14 are dangerous carcinogens that will be emitted from air-cooled dry casks.
 - Tritium is a weak alpha emitter. Carbon-14 is a weak beta emitter, far weaker than the Potassium-40 in a banana. In any case the epidemiological evidence does not show any risk in low dose radiation exposure below 100 mSv/year.

Its clear that the public is largely in the dark about the basic science relevant to nuclear power. I'm certain the public is even less informed about the reality of the biological effects of radiation. Educating the public is not an easy task, but it's necessary to any "consent-based" process. If we fail to expose Fear, Uncertainty, and Doubt, we can't hope to make any progress on these matters. Perhaps the CEP can make available reading materials like Dr. Wade Allison's *Radiation and Reason*. For more than 30 years the Nuclear Industry has utterly failed in public relations. No source of electric power has a better safety record. No source of power is as clean on a life-cycle basis. No source of power is as reliable. No source of power can so easily contain its waste. Yet we haven't even scratched the surface in terms of technological potential. With new reactor designs we can achieve even greater safety, even greater fuel efficiency, even greater power density, and even lower costs. Our main barrier is public relations: we need to continuously answer misinformation with facts and make it clear what the trade-offs are.

Best Regards, Casey Thormahlen

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From: Glenn Pascall  
Reply-To: Glenn Pascall  
Date: Friday, January 30, 2015 at 12:44 PM  
To: Timothy Frazier, "David G. Victor", Dan Stetson, Jim Hamilton, Mary Woollen, Gene Stone, Manuel Camargo  
Subject: Integrated Draft - January 27 - 28 BPC - CEP meetings  
Colleagues,  
Attached is a draft doc that incorporates content from the January 28 discussion to enhance elements garnered from the January 27 panels. Even though it is only a half-page longer, this draft completely

supersedes the earlier version because of tuned-up language and integration of material. I have retained the choice-based structure in a three-part format covering (1) a federal track; (2) a state track; (3) elements common to both. The header includes a Roman II to differentiate this draft from the other. The entire purpose of this draft is to serve the "playbook / road map" function. It is not a summary of discussion. The all-day session on the 28th included many reports from the front lines of specific situations. While my notes reflect these, no content of that kind is included here. Everything is stripped down to principles, strategies and actionable particulars. I believe virtually every discussant on the 28th will find their views reflected here but you have to know how to look for them. An example is Gene Stone's proposal for California interests to speak with Gov. Brown about waste shipments to Texas. You will find Gene's idea reflected in the notion that interstate compacts should be permitted between non-contiguous states - a vivid specific converted into a principle.

It is my belief that both the BRC and the CEP are committed not only to solving immediate problems but to upping the odds on development of a coherent national policy. The attached draft is designed to serve that purpose. I have striven to present each item in language that will minimize individual push-back and maximize willingness to join in broad-based endorsement of a shared agenda.

I hope you find the draft useful in this effort.

Best to all,  
Glenn

From: David G. Victor

Sent: Friday, January 30, 2015 1:01 PM

To: Glenn Pascall; Timothy Frazier; Dan Stetson; Jim Hamilton; Mary Woollen; Gene Stone; Manuel Camargo

Subject: Re: Integrated Draft - January 27 - 28 BPC - CEP meetings

Dear Glenn

Thanks much for all your work—notably in converting a large and sprawling discussion into some strategic action items. About an hour ago I spoke with Alison St John at KPBS who is doing a story on the public meeting. It is encouraging to see media interest in this; it is also clear that the CEP needs to revisit this topic as we figure out what, practically, we might do.

Manuel: can you please circulate this document plus Glenn's memo on the 27 Jan meeting to the whole CEP with our next circular.

All best  
David

**[Reference attachment: BPC-CEP Addressing Nuclear Waste II]**

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From: John Heaton

Date: Wednesday, February 4, 2015 at 10:12 AM

To: "David G. Victor"

Cc: Steve Carlson

Subject: SONGS SNF Storage

SONGS CEP Letter 2-3-15

Dear Dr. Victor;

I am chairman of the Board of the Eddy-Lea Energy Alliance (ELEA) which is a board created by the City of Carlsbad, City of Hobbs, County of Eddy and County of Lea in southeastern New Mexico. We purchased 1,000 acres of land between the two cities for the GNEP project in 2006, and even though we

were chosen as a site and it was characterized, GNEP never materialized. Now, we have been working diligently to develop the site as a central interim storage (CIS) facility for the country. Our area is very pro-nuclear. We have the Waste Isolation Pilot Plant which is a repository 2,100 feet deep in a salt bed, and it has been open for 15 years. We also have URENCO in the area which is a uranium enrichment plant that produces enriched uranium for power plant fuel rods. We also have a low level waste facility in the area.

I think we all had hoped a CIS would have been funded by Congress, and I can assure you Sen. Feinstein has certainly worked tirelessly to make it happen. But, at this point, I believe we all worry that nothing will happen in Congress.

Therefore, recognizing SONGS is relegated to storing their spent fuel on site in a very risky situation and that storage development is a very expensive proposition as well as having ongoing oversight costs, we would like to begin a discussion with you about using our site in New Mexico. I feel certain that you will avail yourselves of the settlement funds through a law suit as other utilities have done. That funding obligation, as I understand it, would cover the capital costs of a storage facility and the ongoing oversight costs until a repository is developed. The only financial obligation that they wouldn't cover, again, as I understand it, are the transportation costs. However, due to the fragile situation of the geologic fault, perhaps a very strong argument could be made with the court to cover transportation to a much less risky site, like the ELEA site, that is relatively close.

At any rate, we think we have the answer for you, and we believe discussions are certainly warranted. Please feel free to contact me at any time.

Best regards,
John Heaton

From: David G. Victor

Sent: Thursday, February 05, 2015 11:15 AM

To: John Heaton

Cc: Steven Carlson; Manuel Camargo; Chris Thompson; Tom Palmisano

Subject: Re: SONGS SNF Storage

Dear John

thanks much for your note. By copy I ask Manuel Camargo to circulate your note and my reply to the full CEP along with the next circular of information to the full Panel.

Last week we had a meeting focused centrally on these questions—in particular, on the opportunities for moving spent fuel from SONGS to one or more consolidated interim storage facilities, along with putting firmer pressure (if possible) on the federal government to adopt and implement wise decisions on permanent storage.

By way of reminder, the CEP is not a decision-making body and we do not operate SONGs; in that spirit, I also copy the key folks at Edison who have those operational roles.

all best

David

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From: Weil, Jenny

Sent: Tuesday, February 10, 2015 09:05 AM

Subject: Re: NRC receives letter of intent for an interim spent fuel storage facility

Hello everyone,

As some of you may be aware, Waste Control Specialists (WCS) has submitted to NRC a "letter of intent" to file an application for a license to construct and operate an independent storage of spent nuclear fuel (and greater-than- Class C wastes) in the first half of fiscal year 2016 (see attached). The company said its decision is based on the level of support from the local community (a county resolution was passed unanimously on Jan. 20), as well as Texas and Congressional officials. The letter also notes that its plans are consistent with the Blue Ribbon Commission recommendations, the Administration's current strategy on used fuel management, and growing sentiment in the House and Senate.

WCS says it will evaluate land it owns for its existing low-level waste disposal facility in Andrews County, Texas, as the potential location for the new facility. It also says it is considering requesting a 40-year license, with the potential for renewing the licensing term in the future.

*Jenny Weil*

*Congressional Affairs Officer*

*U.S. Nuclear Regulatory Commission*

**[Reference attachments: WCS letter and WCS Andrews Resolution]**

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From: Pearson, Jeremy (Hatch)

Sent: Tuesday, February 10, 2015 11:51 AM

To: Ted Quinn

Subject: FW: NRC receives letter of intent for an interim spent fuel storage facility

Hello Ted,

This news is traveling quite fast, but in case you haven't heard...

Jeremy

From: Ted Quinn

Sent: Tuesday, February 10, 2015 11:54 AM

To: 'David G. Victor'

Cc: Tom Palmisano; Manuel Camargo; tedquinn

Subject: FW: NRC receives letter of intent for an interim spent fuel storage facility

Hi David

Assume you have heard this by now. This is good news

Best regards,

Ted
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On Feb 11, 2015, at 9:13 AM, Tom Palmisano wrote:

David

I want to make you aware that Southern California Edison continues to reduce the size of the workforce at San Onofre, consistent with our status as a decommissioning nuclear plant.

At this point in time, we need fewer security officers due to the implementation of several modifications last year that reduced the size of the physical area to be protected. This week we are giving notice to 31 security officers that their jobs are being eliminated. We continue to maintain robust security staffing consistent with Nuclear Regulatory Commission requirements.

We have eliminated more than 1,000 jobs since announcing the plant retirement in 2013. As was the case then, we continue to address the downsizing with the utmost respect and consideration for our employees.

Feel free to share this information with the full CEP as you see fit.

Best Regards,

Tom Palmisano

Vice President and Chief Nuclear Officer

San Onofre Nuclear Generating Station

From: David G. Victor

Sent: Wednesday, February 11, 2015 9:42 AM

To: Tom Palmisano

Cc: Chris Thompson; Manuel Camargo; Liese Mosher; Maureen Brown; Julia Martinez; Esther Park

Subject: Re: For your information: staffing changes in Security

Dear Tom, thanks for your note. I will ask Manuel to share this email along with several others that will be circulating to the full panel shortly. All best wishes, David

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From: David G. Victor

Sent: Saturday, February 14, 2015 1:52 PM

To: Manuel Camargo

Subject: Fwd: Why a CA military base but not Camp Pendleton

Pls circulate this and attachments with next cep mailing.

From: Marni Magda

Date: Fri, Feb 13, 2015 at 12:06 PM

Subject: Why a CA military base but not Camp Pendleton

To: Dan Stetson, tom caughtlan, Ted Quinn, Marni Magda

Dear CEP Members Dan, Tom and Ted,

I was recently sent the transcript of our Jan. 27th CEP meeting and asked to check my comments as a speaker on one of the panels. Reading the transcript has reminded me of my frustration during the meeting of not being able to respond to privatizing Interim storage and especially I am concerned it can't be on an Indian Reservation like the one in Utah that SCE already has licensed to take 40,000 tons of nuclear waste. How would we like that in California on an Indian Reservation?

Profit cannot be the driving force of Interim storage. The taxpayer owns the land at a military base and a NO FLY ZONE can be enforced. Our well trained military can keep us safe from terrorist and human error. The taxpayer must pay this bill for centuries and must protect the environment using a dry storage canister technology that is only 25 years old and untested. Even though David Victor and Pers Petersen both said the nuclear industry is technically ready for dry fuel storage safety, management, and transfer, even David Victor's own research paper in December 2014 proves they are not. They will invent what is needed in the next 60 years.

The government keeps focusing on one final deposit solution and now one interim solution since Pres. Obama budgeted \$5.7 billion for interim storage. We have 33 states with different needs. We need in state stake holder solutions. Crossing state borders brings lawsuits. So the stalemates continue while the industry has no pressure to invent the transfer systems we need NOW. Attached are two separate idea sheets. I hope you will call or meet with me for idea exchanges for a California Initiative that will be a win for all concerned.

Best Regards,
Marni Magda

[Reference attachments: The Nuclear Industry is Selling the Public on Future Promises and The California Interim Solution for Nuclear Waste Must be an Isolated California Military Base]

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From: Tom Palmisano  
Sent: Monday, March 02, 2015 7:38 AM  
To: r johnson  
Cc: JAMES MADIGAN; Manuel Camargo; Tom Palmisano  
Subject: Re: decommissioning question

Roger,  
I've provided some answers to your questions. As far as documents, the currently available documents are posted on the [www.songscommunity.com](http://www.songscommunity.com) web site. They have all been discussed at CEP meetings last year. The documents to look for are the submittal for the Defueled Emergency Plan, the PSDAR and the Decommissioning Cost Estimate.  
Regards,  
Tom

From: r johnson  
Reply-To: r johnson  
Date: Thursday, February 19, 2015 at 9:40 AM  
To: Tom Palmisano  
Subject: decommissioning question

Tom, can you clarify some questions about what is going to happen with:

1. My understanding is that the NRC will permit Edison to discontinue off-site radiation monitoring but it must continue on-site monitoring. And will this continue after all fuel is loaded into dry casks?

I believe you are referring to the NRC submittal to change the current Emergency Plan to a defueled emergency plan. When the Permanently Defueled Emergency Plan (PDEP) is approved by the NRC pre-planned off-site responses to events at SONGS will no longer be required. While the SONGS Emergency Response Organization (ERO) will no longer include off-site radiological field monitoring teams, the Inter-jurisdictional Planning Committee (IPC-SONGS' state and local off-site emergency response agencies) will continue to have the capability to monitor radiological conditions in the areas surrounding SONGS if they deem it necessary. The IPC will remain in place through at least 2019, as required by current state law.

The PDEP ERO will include the capability and requirement to monitor on-site radiological conditions and perform dose assessments for station workers should a radiological event occur at the station. The PDEP maintains requirements for the station ERO to quickly notify the IPC agencies during any declared emergency at the facility.

Once all fuel is in dry storage, the we will submit another change to the Emergency Plan to reflect the change in status. We will continue the requirement for onsite radiological monitoring while fuel is stored in the ISFSI.

2. What is the status of all those ocean pipes? My understanding is that they will all stay in place, or will any be removed? If the pipes are removed, where will they go?

Unit-1: Remain in place and has been 'silted in. All large openings have been covered with plates that have small holes in them so the ocean sand (silt) can pass through and fill the pipe. This has been determined by California State Lands Commission to be the best process for the environment

Unit 2 & 3: No work for decommissioning has been performed yet. Present plans are to perform similar scope as was completed on Unit-1. The final work is to be approved by California State Lands Commission

3. Will the inside of the domes (presumably contaminated) be scraped and then trucked to Utah? Does scraped mean they remove about 6 inches? What about the other 4-5 feet of concrete rubble. What landfill will it go to or will it be buried on site?

All internal 'large components' will be cut into shippable sizes and shipped to a licensed nuclear waste facility. The concrete domes will be carefully broken-up and shipped off site to a licensed facility. Presently SCE is in the planning process and no firm plan or schedule has been established.

Thanks,

Roger

PS: If there are any documents about these details could you give me a link?

*R. Johnson*

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From: David G. Victor <david.victor@ucsd.edu>

Sent: Wednesday, March 18, 2015 2:36 PM

To: Ted Quinn

Cc: Manuel Camargo

Subject: Re: SONGS: NRC Continuing to Learn the Lessons of San Onofre

Thanks much. My plane lifts off shortly, but by copy I ask Manuel to work with you to get a copy of the key document(s) and include them in the next circular to CEP members.

Best

David

From: Ted Quinn <tedquinn@cox.net>

Date: Wednesday, March 18, 2015 at 2:30 PM

To: "David G. Victor" <david.victor@ucsd.edu>

Subject: RE: SONGS: NRC Continuing to Learn the Lessons of San Onofre

Hi David

I went over and the blog and update is NRC actions to prevent another San Onofre from happening --- really followup to the OIG report last fall that Sen Boxer made such a public outcry over ----- yes, I think it would be beneficial to send out

Hope your trip goes well

Best regards,

Ted

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

From: David G. Victor [mailto:david.victor@ucsd.edu]

Sent: Wednesday, March 18, 2015 12:45 PM

To: Ted Quinn

Subject: Re: SONGS: NRC Continuing to Learn the Lessons of San Onofre

Dear Ted, thanks so much for your note. I did not see this. Do you think we should circulate this document full CEP? I'm not sure how I got on the right mailing list at NRC, but this kind of material strike me as quite germane to our work. All best, David

[Reference attachment: NRC Lessons Learned Blog Posting]