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30 September 2015

Dr. Joseph Street
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

RE: CDP Application #9-15-0228

VIA EMAIL: Joseph.Street@coastal.ca.gov

Dear Commissioners,

We write to offer our strongest support for the prompt movement of the spent nuclear fuel at San Onofre from the storage pools into casks designed for long-term storage. Making that option viable requires approval of the expansion of the Independent Spent Fuel Storage Installation - the topic of the application before you.

We lead the Community Engagement Panel (CEP)—a group of 18 volunteers established in early 2014 to open a conduit between Edison (the operator of the San Onofre site) and the local communities that will be affected by the process of decommissioning. The CEP does not make decisions and thus the comments in this letter reflect our impressions of the CEP's work rather than formal views or decisions of the body.

The CEP has devoted a substantial part of our agenda over the last 18 months to the question of whether stainless steel casks are a safe and effective means of long-term storage of spent nuclear fuel. Last year one of us (David) chaired a group of CEP members that led to a [white paper](#) which evaluates the extant literature on this question and also recommended a program that Edison should follow as it implements long-term storage in casks at the site.

All of the recommendations that we made have been accepted by Edison, and one role of the CEP will be to provide ongoing discussion and oversight as this program is implemented. For example, our white paper calls for Edison and the vendor of the casks (Holtec) to articulate in plain English the long-term defense in depth program for ensuring integrity and security of the

site even as the casks age. Our white paper also requests that Edison take the lead in building a research program—in collaboration with others in the industry—that would monitor and assess the aging process.

We see that the staff report recommends offering only a 20-year approval of the site contingent upon the appearance of other risks as the site ages. We can't speak to the merits of that approach, but we note that a critical element over any long term plan for the site involves not just coastal hazards but also a good program for managing the aging process of the casks themselves. The current trends in the industry and the technology are in line with what will be needed.

Quite apart from the proposal on which you are ruling, we draw your attention to the fact that all of us would benefit from the rapid removal of the fuel from the site altogether. The option of sending the spent fuel to Yucca mountain in Nevada seems infeasible—perhaps forever. That reality makes the option of a consolidated interim storage (CIS) at private facilities—such as the sites now emerging in New Mexico and Texas—particularly important. The CEP is now quite focused on how to make CIS a reality for the fuel at San Onofre and other reactors in California.

It could be quite helpful if the Coastal Commission were to signal its general interest in making CIS a reality. This would be a huge advantage in moving spent fuel from all the sites that are located on our coastline.

Yours Sincerely,

(signed)

David Victor

Chairman,

Community Engagement Panel

Professor, UC San Diego

(Signed)

Tim Brown

Vice Chairman,

Community Engagement Panel

Councilman, City of San Clemente

(Signed)

Daniel Stetson

Secretary,

Community Engagement Panel

President Emeritus, The Ocean
Institute