



**September 2, 2014**

**From: Daniel Stetson**

**To: SCE, CEP Chairman David Victor & Members**

**RE: Input on Draft PSDAR, EIE and DCE Reports**

Thank you for the opportunity to review and provide input on these drafts.

**Draft Post-Shutdown Decommissioning Activities Report**

As it is certain that the spent fuel will be stored on site in canisters for the foreseeable future, it is imperative that they be stored and maintained to the highest safety level possible. The two identified potential canister suppliers, Areva Trans Nuclear and Holtec International, continue to improve the design of their products. In a recent press release, Holtec describes that they are going to a “double wall construction” for a facility in Ukraine.

“Like Ukraine's national facility, Holtec's HI-STORM ventilated system is the designated technology for the Skull Valley (Utah) site; however, for added safety, the welded multi-purpose canisters employed at the CSFSF (Central Spent Fuel Storage Facility- in Ukraine) site will be of a double wall construction, just like its sister facility for storing Chernobyl's spent fuel, located a few kilometers away.”

How much “added safety” does this provide? Regardless of the supplier, does it make sense to utilize a canister with double wall construction for SONGS?

After the Alaskan oil spill there was federal and state legislation that required every ship to have a detailed Emergency Preparedness Plan. In the case of a spill, regardless of the vessel's location along the US coast, the ship was required to have a plan that included every single required resource necessary to respond, clean up the spill and address potential environmental damage. As such, resources were established along the coast and are being maintained in case of a spill emergency. The Gulf spill demonstrated that, even with this type of protection in place, we can never be too prepared. SONGS should develop and have in place a “worst case scenario” emergency response plan. Removing the cooling pools, seawall and train rails appear to significantly reduce safety resources for protection and response. As the Decommissioning Cost Analysis Report states, “Maintaining the spent fuel pool for an extended duration following cessation of operations prevents termination of the Part 50 license....” Is this, however, the safest course of action?

**Draft Environmental Impact Evaluation Report**

The EIE is incomplete as it does not include an analysis of the ocean impact, primarily the removal of the intake and exhaust conduits. A study of the conduits and the surrounding aquatic biology should be undertaken right away. Should eel grass or other protected species be found in the area, a case can be made for leaving the conduits in place. If chemical, nuclear or other contaminants are found, the conduits obviously need to be removed. If contaminants and protected species are both found, the conduits still need to be removed and a mitigation plan developed. None of this can take place, however, until the underwater area is surveyed and the evaluation criteria established.

**Draft Decommissioning Cost Analysis Report**

Given the parameters of how this report was prepared and our own lack of experience in this area, it seems impossible to properly evaluate and comment upon its findings. As such, independent, outside expert peer review is recommended to confirm its findings.

Sincerely,



Daniel T. Stetson  
President & CEO