

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

From: songs.sce.com

Sent: Tuesday, March 03, 2015 11:28 AM

To: NUCCOMM

Subject: New CEP Message

This is an automated email response from Community Engagement Panel Date Sent: 3/3/2015

First Name: Kristen

Last Name: Franz

Email address:

City: Los Angeles

State: CA

Message: Hello,

We are interested in learning more and being involved in the CEP. As Landscape Architects and Designers we are interested in the decommissioning process and community awareness.

Are there any upcoming meetings we can attend?

Thank you,

Kristen

From: Esther Soto

Sent: Monday, April 6, 2015 10:35 AM

To: Kristen Franz

Subject: SONGS - SONGScommunity.com Email

Ms. Franz,

Thank you for your interest in the Community Engagement Panel. The next meeting is scheduled for the evening of Thursday, April 16, in the San Juan Capistrano Community Center from 6 p.m. to 9 p.m. Information regarding upcoming meetings can be found on www.SONGScommunity.com. You may also sign up to participate in a walking tour of the plant, and receive automatic updates on news and events related to the decommissioning of San Onofre.

Thank you for your email and interest in the SONGS decommissioning process.

Esther Soto

From: Kristen Franz

Sent: Monday, April 13, 2015 12:10 PM

To: Esther Soto

Subject: RE: SONGS - SONGScommunity.com Email

Esther,

Thank you for your response. I look forward to attending the meeting this coming Thursday.

How do I schedule a time to tour the plant?

Thank you,

Kristen

WERK | Charles Anderson Landscape Architecture

www.werk.us

From: Esther Soto

Sent: Monday, April 13, 2015 1:55 PM

To: 'Kristen Franz'

Subject: RE: SONGS - SONGScommunity.com Email

Hi Ms. Franz,

You can register for a public walking tour of the plant at www.SONGScommunity.com.

On the home page, scroll to the towards the bottom there is a link "Request a Walking Tour". Clicking on the link it will direct you to the page to sign up, you can view the available dates from the drop down menu.

We look forward to see you at one of the upcoming walking tours.

Thank you,

Esther Soto

From: songs.sce.com
Sent: Monday, March 09, 2015 2:26 PM
To: NUCCOMM
Subject: New CEP Message
This is an automated email response from Community Engagement Panel Date Sent: 3/9/2015

First Name: Hector
Last Name: Morales
Email address:
City: La Jolla
State: CA

Message: Greetings,
My name is Hector Morales, I'm a professional photographer based in La Jolla that is seeking permission to take photographs of the interior structure of the San Onofre Nuclear Generating Station to highlight the decommissioning process. The photos are for assignments given by American MENSA Society and National Geographic. While I am allowed to submit images per assignment for publication consideration to these organizations, I would like to state that I am not employed by either.

My work is strictly freelance.

You can view samples of my photography at www.jayresh.com To clear up any confusion, "Jay Resh" is a pseudonym I use in photography.

The images I take may be published by the aforementioned organizations as well as be submitted to other assignments. Photos that I take may also be used by your organization in the form of online or printed promotional media, but not for resale.

I look forward to hearing from you, and hope that you will allow me the opportunity to capture these powerful images.

Sincerely,
Hector Morales
Jay Resh Photography
www.jayresh.com

From: Esther Soto
Sent: Monday, April 06, 2015 10:37 AM
To:
Subject: SONGS - SONGScommunity.com Email

Mr. Morales,

Thank you for your interest in the San Onofre Nuclear Generating Station. Due to regulatory requirements for security established for nuclear power plants in the United States, photography is not allowed on the site, unless for business purposes.

We do invite you to take a public walking tour of our plant. You can sign up at our website www.SONGScommunity.com.

Thank you for your email and interest in the SONGS decommissioning process.

Esther Soto

Decommissioning - Nuclear Organization
San Onofre Nuclear Generating Station
Southern California Edison
www.SONGScommunity.com

On 4/20/15, 12:37 PM, "Ray Lutz" wrote:

>Dear Mr. Victor, Chair of the CEP:

>

>I am unable to find any bylaws or other organizational documents on the
>SongsCommunity.com website. Please send me anything that you have which
>defines the role of the CEP other than the press releases that I do
>find there. Normally, there is a constitution and bylaws document.

>

>Thanks!

>

>--Ray Lutz

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

From: David G. Victor
Sent: Monday, April 20, 2015 12:51 PM
To: Ray Lutz
Cc: Manuel Camargo
Subject: Re: CEP Bylaws or similar organizational documents

Ray

Manuel can help

David

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

From: Manuel Camargo
Sent: Monday, April 20, 2015 1:02 PM
To: David G. Victor; Ray Lutz
Cc: Tom Palmisano
Subject: RE: CEP Bylaws or similar organizational documents

Ray,

The charter for the San Onofre CEP is available on the website at
http://www.songscommunity.com/docs/SONGS_Decommissioning_CEP_Charter.pdf.

I also have attached a PDF of the charter for your convenience.

Best

Manuel

Manuel C. Camargo Jr.
Principal Manager, Nuclear Decommissioning Projects Southern California Edison
www.SONGScommunity.com

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

From: songs.sce.com
Sent: Tuesday, March 24, 2015 1:43 PM
To: NUCCOMM
Subject: New CEP Message
This is an automated email response from Community Engagement Panel Date Sent: 3/24/2015

First Name: patricia
Last Name: borchmann

2

Email address:

City:

State: CA

Message: CEP's website so far ONLY contains the 04 16 15 Notice for CEP's next meeting in SJC, from 6-9 pm, but no stated purpose, website has no slides, meeting agenda, or reports/memos/ or materials being previewed by CEP Panel members. So, HOW DO members from the public get access to these important materials, and why aren't they automatically get posted whenever this website is updated? When important CEP meeting(s) are posted, it is crucial for public to have access to same materials presented to CEP Panel members, far enough in advance of the upcoming 04 16 15 CEP Meeting for public to preview material in advance of the meeting.

If public wants to see topics placed on CEP Panel Agenda, does CEP Panel have a "process", and if so how much notice & justification is necessary in advance of 04 15 15 ?
Thank you. patricia borchmann (ca)

From: Esther Soto
Sent: Monday, April 06, 2015 10:27 AM
To: 'patricia borchmann'
Subject: SONGS - SONGScommunity.com Email
Ms. Borchmann,

We have posted on the SONGScommunity.com website the date and time for our next Community Engagement Panel meeting to make the public aware of the upcoming forum at the San Juan Capistrano Community Center on April 16, 2015 from 6 p.m. to 9 p.m. The agenda for the meeting should be posted to the website by Monday, April 13. All meeting material will be available on the website following the meeting. You can also view materials for prior meetings, including: agendas, presentations, and web casts, by going to the Community Engagement Events Calendar and clicking on the meeting of choice.

If you would like to suggest a topic for consideration by the panel, you may do so through the "Contact Us" link on the CEP page at www.SONGScommunity.com.

You can also register on the website to receive automatic updates when meeting notices and other important documents are published on our website.

Thank you for your email and interest in the SONGS decommissioning process.

Esther Soto
Decommissioning - Nuclear Organization
San Onofre Nuclear Generating Station
Southern California Edison
www.SONGScommunity.com

From: Patricia Borchmann
Sent: Thursday, April 16, 2015 2:41 PM
To: Patricia Borchmann; webcomm.sce.com; Web Comm; 'david victor'; Esther Soto
Cc: Donna Gilmore; San Clemente Green
Subject: SONGS CEP Panel Mtg 04 16 15 - Public Opposition - SCE License Exemptions, and proposed Emergency Plan Reductions

Please accept my personal comments, in attached letter.

And please confirm by email , that you have received my Letter dated today.

And if possible, please make it available in advance to CEP Chair David Victor in advance, and make it available to any member of the media, or public.

If there are questions, my phone is ### ## in . Thank you for consideration. P

Attachment:

SONGS CEP Panel 04 '6 15 Opposition SCE License Exemptions, Emergency Plan Reductions (revised) 3.docx

From: Esther Soto
Sent: Thursday, April 16, 2015 5:37 PM
To: 'Patricia Borchmann'; webcomm.@sce.com; Web Comm; 'david victor'
Cc: Donna Gilmore; San Clemente Green; Manuel Camargo
Subject: RE: SONGS CEP Panel Mtg 04 16 15 - Public Opposition - SCE License Exemptions, and proposed Emergency Plan Reductions
Tracking: Recipient Delivery Read
'Patricia Borchmann'

Ms. Borchmann,

Thank you for your email. We have received your document and will distribute it to the CEP panel prior to the meeting,

including Chairman Dr. David Victor. We will work on incorporating your document into the public comment portion of the meeting.

Thank you,

Esther Soto

Decommissioning - Nuclear Organization

San Onofre Nuclear Generating Station

Southern California Edison

www.SONGScommunity.com

From: Patricia Borchmann

Sent: Friday, April 17, 2015 11:48 AM

To: Esther Soto

Cc: Patricia Borchmann; Donna Gilmore; San Clemente Green

Subject: Thanks to SCE, and CEP for productive Public Meeting last night 04 16 15 - (SONGS 2 & 3)

Hello again Esther. Just wanted to say thank you for distributing my personal letter to CEP Chair David Victor last night prior to the meeting, to other CEP Panel members, speakers from NRC, and SCE. Mr. David acknowledged my letter, and indicated it would be included in public record.

Since the CEP Meeting Agenda was packed with relevant topics, it was impressive that CEP Chair Victor kept the Meeting organized and on schedule last night in San Juan Capistrano. There was a long way to go (distance), and a short time to get there (9:00 pm) before the meeting was adjourned.

Generally, it seemed CEP's Public Meeting was mostly productive, and it's outcome seemed better than usual, at least to me?

I hope, and expect, my perception is similar that of other stakeholders.

A renewed SCE commitment was welcomed by the public, to reflect Licensee's pledge to improve outreach efforts by performing a number of additional followup tasks, which were specifically defined by CEP Panel. CEP Panel agreed that Licensee response materials should be agendaized as topics at future CEP Meetings. SCE confirmed that CEP Meetings are still expected to continue. SCE confirmed that California Energy Commission is expected to agendaize a CEP Topic for their next Commission meeting in San Francisco, on May 17, 2015 about San Onofre (SONGS 2 & 3) Decommissioning Plans, and pending permit approvals by various public agencies.

SCE also confirmed that Licensee would continue to provide 100% funding for Emergency Plans onsite, until 2019. At that point (currently projected in 2019), SCE expects Emergency Plan funding, and performance scope will be reduced, but fully maintained at an appropriate level of security and monitoring, to ensure an equivalent level for ongoing public health and safety will be maintained, and safety margins will not be reduced, or threatened.

Stakeholders strongly support Chair David Victor's request that Licensee also prepare an additional time sequence projection - to reflect an ongoing 'evergreen calendar' for projected benchmark milestones completed, and that it be routinely updated at least monthly on status updates, and to prepare an ongoing calendar to reflect future CEP Meeting(s), and any relevant NRC public comment deadlines on Rulemakings, or any relevant NRC Commission Meetings pertaining to Decommissioning Plans, Waste Storage, Cask Designs, Advice Letters, pending interim policy guidance issues.

I have not had opportunity to view any newspaper articles about last night's CEP Meeting, from papers circulated in Orange County, LA County, San Diego, or Riverside County. As a remote viewer of the CEP's webcast (with live meeting broadcast online), I noticed there were many mainstream media members present at the meeting, so stakeholders would welcome any comprehensive media coverage from last night's CEP Panel meeting in San Juan Capistrano.

My primary purpose in today's email, is to extend thanks for your consideration, and courtesy to distribute my personal letter to CEP Panel,

in advance of the meeting. Since I viewed the website live broadcast remotely from Escondido, your assistance was certainly a vital necessity for me. Generally, it seemed that the take-away from CEP Panel Meeting was that new options, for potential state, or regional Consolidated Interim Waste Storage facilities might be examined further by Licensee, and advanced as new Agenda Topic for Next CEP Panel Meeting in May 2015. SCE also confirmed that the application for submittal to California Coastal Commission is currently being undertaken.

It seemed reassurances and agreed upon follow up tasks defined by CEP Panel provided an improved 'comfort level' among stakeholders, that was welcome. Again, I hope my perception is consistent with public perceptions by other stakeholders, and if it is not, I hope SCE will inform me. I am hopeful also, that CEP Panel's future meeting(s) will remain on-track.

From: Esther Soto
Sent: Tuesday, April 28, 2015 2:21 PM
To: 'Patricia Borchmann'
Subject: RE: Thanks to SCE, and CEP for productive Public Meeting last night 04 16 15 - (SONGS 2 & 3)

Good Afternoon Ms. Borchmann,

Thank you for your email.

I am contacting you to obtain your consensus on distributing your email to Dr. David Victor and the full CEP panel, as well as posting your email on our SONGScommunity.com website. We post most communications with the public to the SONGScommunity.com website. We will protect your personal information by deleting your email address as we typically do.

Please reply to this email providing your agreement to post this information.

Thank you for your time,

Esther Soto

Subject: In what way are you saying Dr. Singh's remark was misquoted or taken out of context?

Date: Fri, 17 Apr 2015 11:18:15 -0700

From: Ace Hoffman

To: David victor, Esther Soto, webcomm

CC: Donna Gilmore

Dr. Victor,

Last night you said that a statement Dr. Kris Singh, CEO of Holtec, makes on a video I've posted here from a prior SCE/CEP meeting "misquotes" and/or "takes out of context" Dr. Singh's remarks:

<https://youtu.be/euaFZt0YPI4>

That is a very serious charge. I would like you to explain why you made it.

(And by the way, there were audio problems with the livestream throughout the meeting, where the video would pause (okay, that's normal) and then sometimes skip (that's NOT normal!), but I don't think I am misquoting you in this instance. Please let me know if I am. Also, even though you started more than 10 minutes late, at 9:03 you cut off the last member of the public to speak, Bruce Campbell, who was speaking eloquently and clearly and concisely, and then within a minute, at 9:04, you stated that the purpose of the CEP was to let the public be heard. Well?)

The videotape (URL above) is perfectly clear (if you listen carefully...). Of course Dr. Singh didn't mean it would all leak out at once, but let's say one puts the leaking canister into a "Russian Doll" configuration (inside another, larger canister):

In that case, wouldn't "millions of Curies" transfer out of the inner container into the second container? First, the inner and outer casks will equalize pressure, then "brownian motion" will continue to equalize the percentages of various elements in the gas on either side of the leak over time. If leakage from the inner container to the outer container "doesn't count" in Dr. Singh's estimate, how long did he think it would take to plug the leak, and what happens when the new, rushed, outer containment later starts to leak, or what happens if the inner container fails more completely, and, for example, an end plate falls off due to crack growth)?

Precisely how radioactive the "inert" gas is (mainly helium, but with "trace" (watch out for that word! It can mean a lot of things, literally!)) quantities of water vapor, tritium, cesium, strontium, etc..) undoubtedly depends in large part on the condition of the cladding: Damaged fuel cladding could leak gaseous fission products (and water vapor) into the atmosphere of the 1/2-inch thin stainless steel cask over time, and then out the leak hole.

The specific activity of pure H3 (Tritium) is about 10,000 Curies per gram.

So one question is: What is the condition of the fuel Dr. Singh assumes is inside the leaking cask?

What does Dr. Singh envision would happen next to the cask, after the gasses leak out and the pressure is equal to the outside world from then on, until the leak is plugged, or the "Russian Doll" is built and the cask placed in it? The outer container will make the cask extra-large and extra-heavy: Can it still be transported? By road? By rail? Over what infrastructure (over or under how many old and decrepit bridges?) How many natural gas pipelines will the waste be transported over?

The Areva representative at the same CEP meeting stated that heating damaged fuel for transport might be necessary -- and would be possible -- to make it more ductile (and thus better able to withstand the jolts of transport). How does Dr. Singh envision that fuel inside an additional heavy overpack would be heated for transport, and yet even with the massive heating mechanism necessary for such a thing, it would still not be too heavy to carry over our nation's old highway and/or railroad infrastructure, to some "desolate" location (that doesn't actually exist; for example, I (and at least 100,000 other people) drove fairly close to the Chocolate Mountains four times in the past two weeks)?

Assuming Dr. Singh successfully uses the "Russian Doll" solution to mitigate a canister leaking from a microscopic crack, when the pressures equalize, if the cask is not already encased in an outer cask, then outside air starts to go INSIDE the "dry" cask as ambient pressures fluctuate with the wind: There will be moments when the cask sucks in air through the same hole that had been expelling pressurized radioactive gasses. Whenever that happens, water vapor, corrosive elements, etc. can come rushing in.

So not only must the leaking canister be placed in the "Russian Doll" canister immediately, the outer container has to be 100% inert gas (helium), but also, the outside surface of the old dry cask has to be completely cleaned of corrosive materials. But cleaning it may introduce yet more microscopic cracks -- well, actually, "will" introduce such cracks, not "may." And all this has to be accomplished while the cask is expelling radioactive gasses, unless the leak is plugged first, which can, in the long run, do even more damage? (For example, drill bits can drop material into the dry cask as they break through, burrs can cause new cracks, overheating can weaken the alloy around the plug, etc..)

Also, gamma radiation will probably be streaming out the crack, however small it is. These invisible rays will have to be carefully avoided by the workers.

What if the leak is in a hard-to-reach spot? What if the cask has been deformed and won't fit a standard overpack "Russian Doll" outer canister (Do they even exist? I don't think so!)?

If the small-but-continuous-leak occurred when the site was damaged by an earthquake/tsunami, it might be very hard to get at the breached dry cask. What condition is Dr. Singh assuming the dry cask will be in when the breach occurs? Will it be just sitting there rusting away (stress corrosion cracking; the weights involved in dry cask storage are enormous, and the pressure-points that take the weight are particularly susceptible...)?

Or was he envisioning that the tiny crack occurred while the dry cask was crushed under a burning 747 loaded with jet fuel (and possibly thousands of pounds of explosives, too)? A dry cask is absolutely no protection against a 747 and nor is the reinforced cement overpack/covering/beehive configuration. A wide variety of modern weapons can go through more than a dozen feet of reinforced concrete -

- yet SCE/Holtec offers us only about three feet. Even a 50-caliber machine gun can pound through that fairly quickly (though probably not on the first shot). (I think that's one reason the "sunken" option we are being offered by Holtec is somewhat better than the above-ground stacking we now have for the first 51 dry casks.)

And here's the thing about isolation at an interim storage facility, which so many people last last night's SCE/CEP meeting wished to magically have happen to our nuclear waste: It proves that people expect the outer containments (the thin stainless steel casks) to fail eventually. They want that failure to happen away from large populations.

The government agrees with this assessment (as do you, based on your remarks last night). The Blue Ribbon Commission pushed for one or more "interim" storage sites, which are places to keep the fuel for several decades or, more likely, for several centuries or, even more likely, forever, and thus (in the government's vision) enable reactors to keep operating without having to stack up this deadly material so close to large populations.

Whether "old fuel" or "young fuel" should go there first is debatable -- you assumed, last night, that closed reactors would get priority. I see no reason to assume that.

Since everyone is clamoring to get the waste away from southern California, clearly, the idea that half-inch thin dry casks are adequate is ridiculous: No one believes it.

Holtec is selling the deadliest pig-in-a-poke in history. And you're buying it.

But back to the "misquote."

How tiny of a theoretical crack are we talking about? I've been assuming a microscopic crack, or at least that it starts out that way. Sometimes cracks plug themselves with crud... but more often, they grow over time (just like with steam generator leaks). What did Dr. Singh envision the utility/NRC would do to stop the breach once it had started? What are the conditions he's putting on his statement besides just using an overpack rather than attempting to repair the damaged canister? And how soon could he have an overpack ready, have the outer side of the leaking cask cleaned, excavate the cask from underneath a burning 747, and have everything be properly inspected from manufacture right up to insertion of the damaged canister and sealing up the "Russian Doll"? What is Dr. Singh's promise that he can do?

A dry cask can hold many millions of Curies of radiation. After ten years, spent fuel has about 4×10^5 (400,000) Curies of radiation per ton of fuel (1). A million Curies leaking out would be quite a significant leak, but hardly the whole load.

So, I ask: Why are you saying Dr. Singh is saying he was misquoted? His statement is on the video exactly as we claim it is (2). Where's the misquote?

I hope you (and/or Dr. Singh) will answer these additional questions.

Sincerely,

Ace Hoffman
Carlsbad, CA

Footnotes:

(1) Source: Nuclear Energy ebook Collection: Ultimate CD, page 298

By Gianni Petrangeli, Raymond Murray, Colin Bayliss, Galen J. Suppes, Elmer E. Lewis, Hideo Kozima

(2) Here is a longer recording of Dr. Singh's remarks from his appearance at the SCE/CEP that night, plus a few others who also spoke: <https://youtu.be/s5LAQgTcvAU>

=====

** Ace Hoffman, Owner & Chief Programmer, The Animated Software Co.

** home page: www.animatedsoftware.com

** To cease contact, please put "Unsubscribe-me-please" in the subject.

From: Donna Gilmore
Sent: Friday, April 17, 2015 2:19 PM
To: Decommission San Onofre; NIRS Summit; Bart Ziegler
Cc: Marvin Resnikoff; Marvin Lewis; David Lochbaum - Union of Concerned Scientists; NoNukes Yall Group
Subject: In what way are you saying Holtec vendor Dr. Singh's remark about inability to repair spent fuel canisters was misquoted or taken out of context?

I stated at last night's Edison Community Engagement Panel (CEP) meeting that Holtec cask vendor CEO Dr. Kris Singh said the thin 1/2" to 5/8" thin dry storage canisters were not repairable. David Victor, CEP Chairman, claimed Dr. Singh was quoted out of context. I was not give time to rebut this.

The below email includes comments from Ace Hoffman to David Victor. Ace recorded Dr. Singh's October 14, 2014 CEP statements. Here is the link to Dr. Singh's video and key statements from the video.

<https://youtu.be/euaFZt0YPi4>

It is not practical to repair a canister if it were damaged...if that canister were to develop a leak, let's be realistic; you have to find it, that crack, where it might be, and then find the means to repair it. You will have, in the face of millions of curies of radioactivity coming out of canister; we think it's not a path forward

you can easily isolate that canister in a cask that keeps it cool and basically you have provided the next confinement boundary, you're not relying on the canister. So that is the practical way to deal with it and that's the way we advocate for our clients...

a canister that develops a microscopic crack (all it takes is a microscopic crack to get the release), to precisely locate it And then if you try to repair it (remotely by welding) the problem with that is you create a rough surface which becomes a new creation site for corrosion down the road. ASME Sec 3. Class 1 has some very significant requirements for making repairs of Class 1 structures like the canisters, so I, as a pragmatic technical solution, I don't advocate repairing the canister.²

Donna Gilmore

From: Bart Ziegler
Date: Saturday, April 18, 2015 at 1:20 AM
To: "David G. Victor"
Cc: 'Marvin Resnikoff', 'Marvin Lewis', 'David Lochbaum - Union of Concerned Scientists', 'Donna Gilmore', 'NIRS Summit'
Subject: RE: In what way are you saying Holtec vendor Dr. Singh's remark about inability to repair spent fuel canisters was misquoted or taken out of context?

Dr. Victor,

This appears stunning concern for those of us not in attendance last night. We would not expect this from a member of our scientific community, and San Diego academic community.

Perhaps you might shed some light on your account of last night's meeting?

Thank you,

Bart Ziegler, PhD.

EMAIL OF 20 APRIL FROM DAVE LOCHBAUM ³REPLY ALL² TO A SUBSET OF THIS LIST:

I take Dr. Singh's comments to mean that repair of a dry storage canister would like not be the most likely corrective action.

When problems are discovered at nuclear power plants, they are entered into the corrective action program. The program has three basic outcomes: (1) repair, (2) replace, and (3) accept as-is.

My impression is that Dr. Singh was saying that repair is less likely an option than the other two corrective actions.

In May 1998, an unexpected chemical reaction between an epoxy coating applied inside a dry storage canister and borated spent fuel pool water produced large amounts of hydrogen gas. The gas detonated when a worker was welding the lid to the canister. That problem led to the canister being returned to the spent fuel pool, its contents unloaded, and the spent fuel reloaded into a different canister. This was the second outcome in practice.

Many weld and metal surface indications fail the initial inspection screening criteria. But follow-up evaluations of the specific situations can legitimately support accepting the conditions as-is with neither repair nor replacement. This would be the third outcome in practice.

The repair outcome for dry storage canisters is really intended before they are loaded with irradiated fuel. A fully loaded canister complicates the repair option.

This is not to suggest that any problem with a loaded canister gets a pass. If the problem is evaluated and found to be minor enough, accept as-is could be a safe thing to do. If the problem is not minor, replace seems more likely than repair.

Thanks,
Dave Lochbaum
UCS

From: David G. Victor

Sent: Friday, April 24, 2015 6:18 AM

To: Manuel Camargo; bill horn ; brown tim; dboston; dan stetson; Eaton, Marisol; garry ; g pascall; Jim leach ; jkern; jmalpay; john alpay; Lindsay Stigall; Mayor Carlos Olvera; Mayor Pro Tem Pam Patterson; mrose; rhaydon; rmcphe8888; Steven Carlson; Supervisor Lisa Bartlett; Tanya Flink; ted quinn; tim brown; Tom Caughlan; vmacedo ; William parker

Cc: Esther Soto; JAMES MADIGAN; Jennifer Manfre; Jose Perez; Julie C Holt; Larry Labrado; Larry Rannals; Liese Mosher; Maureen Brown; Robin Mainardy; Tom Palmisano; Veronica Gutierrez; Viet Tran; Alisa Do; LOU BOSCH; ROSS QUAM; John Brabec; Cindy Howell; RANDALL GRANAAS

Subject: SONGS CEP: an email to the community about mis-quoted statements

Dear Members of the CEP

It was a pleasure to see many of you last week. And I thank you all for your volunteer service on the important issues that will affect the decommissioning of San Onofre.

We have conducted our meetings in the spirit of openness, engagement and honest public interaction. We have brought in experts, held workshops, discussed white papers and done our best to turn over all the stones and look closely at the best options for decommissioning. And we have done that in the spirit of the CEP's founding—to open a conduit with Edison so that we can learn about decommissioning and Edison can learn what the communities want.

Unfortunately, a small but vocal segment of the community has taken some of this information and moved it out of context into highly misleading soundbites. Last week I spoke briefly about a recent instance of this—with regard to the claim, attributed to Dr. Kris Singh (head

of Holtec), that the stainless steel canisters that will be used to store spent fuel are prone to cracking and can't be repaired. Videotape from a CEP special meeting last October, where Dr. Singh spoke, had been clipped and transcribed in a way that created impressions exactly the opposite of what Dr. Singh had actually said. There have been many other similar instances as well.

Below is a copy of a long email I sent to several members of the community earlier today—in response to another round of mis-quoted and highly misleading comments.

I don't propose that we respond to every mis-step and false use of facts—that would be tiresome and distracting. But I do think we have an obligation to keep our discussions focused on sound analysis and a full, respectful and civilized discussion about real options. That is important not just for the debate itself but also to give confidence that experts who share their insights with us won't find themselves dragged through the mud or quoted out of context.

All best wishes

David

—

Dear members of the SONGS communities,

Following last week's Community Engagement Panel (CEP) meeting I've seen a large number of emails concerning Kris Singh's comments at our special meeting in October. You may recall that Kris Singh of Holtec International said that he would not favor repairing stainless steel canisters if they were cracked. These comments have, subsequently, been taken by some members of our community as evidence that stainless steel canisters are not repairable and as evidence that such canisters are a dangerous and expensive option. At our CEP meeting last week I stated that Dr. Singh's comments had been taken out of context. Over the weekend many people have written to excoriate me for that statement (or have said things even worse). On Friday, I saw some of those emails forwarded to the press, and thus I must respond. Every statement in the email that follows has been checked with the people who actually said it and I have cross-checked the content.

Over the last 15 months we had a spirited debate about the options around and storage of spent nuclear fuel at SONGS. Nobody wants the fuel at SONGS for the long haul, but until a viable option appears we have no real choice. We must store onsite. That means using stainless steel canisters — and, as a practical matter, it means buying those canisters from one of the two dominant vendors in the US: Areva or Holtec.

A group of community members has developed the argument that the option of using stainless steel canisters is unsafe at any speed. That argument has been based, more or less, on the following steps and logic:

1. Stainless steel is prone to crack in the environment around the center for a plant.
2. The stainless steel systems, including their concrete "overpacks"—cannot be inspected on a regular basis, and NRC won't even require that even if they could. Thus cracks could appear and we wouldn't know it.
3. If a crack were to appear the canisters could not be repaired, leading to terrible consequences for the community.
4. One of those terrible consequences would be a massive release and radiation.
5. Another consequence would be the need to repurchase another canister system. And since SONGS has earmarked \$1.3 billion to managed used fuel, that must mean spending another \$1.3 billion.

Not every player in this debate has said all of those elements in exactly the same order. But this is the narrative that is being offered to the public eye. I believe that every step in that narrative is empirically flawed. And the overall logic is deeply flawed—in ways that are misleading to the community about our best options.

The white paper that I assembled deals with all of these issues. It has been extensively reviewed and is based on a massive input of expert information and multiple rounds of review. I will not recap each of the elements here, but this email focuses on steps 3, 4 and 5 because those are the items that directly relate to what Dr. Singh said. Using Dr. Singh's comments at our October 2014 meeting as support for this line of logic is exactly the opposite of what he said and intended.

The comments quoted from the CEP meeting in October 2014 were part of a larger discussion at that meeting about the question of what would happen if a canister crack were found. Neither Dr. Singh nor Dr. Michael McMahon of Areva TN, the other expert at that meeting, thought that canisters would ever face any significant cracking issues. In fact, they both thought that the canisters would last perhaps 100 years or more. But nonetheless, because the community was concerned with the question of what would happen if a crack were found we asked them what would happen—along with a handful of other questions that were designed to address concerns expressed in the community about storage of spent fuel in these canisters.

Dr. Singh and Dr. McMahon responded by saying that the best response would depend on the particular situation. Dr. McMahon emphasized that if a crack were found, advanced welding techniques could be applied to the task. He pointed to the example of Palo Verde in Arizona where repairs were under way on a "nozzle" using these kinds of advanced welding techniques. Given the extremely constrained space where the welding was needed, high radiation, and tight timetable for the nozzle repair, Dr. McMahon was confident that if the industry faced the need to repair a canister it could also quickly and effectively respond. He also pointed out that if welding did not seem like a practical option, the damaged canister could be put into a transport canister and would meet NRC standards. Dr. Singh, on the other hand, made the argument that it would be just easier to replace the canister—because repair would be less practical. And in the ensuing conversation it was made clear that replacing the canister might be done by moving the damaged canister to a site that had an operational fuel pool. Or, it might be done on site with the technology called a "hot cell." Everyone on the panel seemed to agree that the best course of action would depend on the circumstances but that THERE WERE MANY OPTIONS FOR ACTION IF, IN THE EXTREMELY UNLIKELY EVENT, A CANISTER WERE CRACKED OR SOMEHOW DAMAGED. (My emphasis added; an email from Dave Lochbaum at UCS earlier today, which is copied below, added more detail on current industry practice—his assessment resonates with what Dr. Singh and others said at our October 2014 CEP meeting.)

I have seen clips of the meeting posted and quoted in various places—out of context. It would be better to look at the whole event to understand the context. It's posted in three parts in the CEP video library:

<http://www.songscommunity.com/videos.asp#.VTaWfBfxsiQ>

Why does all this misquoting matter? In my view, it matters for four reasons.

First, quoting Dr. Singh out of context has created the impression in the broader public that we are sitting on top of a ticking time bomb that is just waiting to cause havoc in the community the moment the canisters crack. In fact, Dr. Singh said exactly the opposite, as did Dr. McMahon. Not only did Dr. Singh argue that the canisters were extremely robust against cracking — to my knowledge, there is not a single instance of a canister placed into service in the US ever cracking, nor has any canister even demonstrated signs of early cracking despite decades of service. Moreover, Dr. Singh has argued that if precursors to cracking were detected a large number of solutions to the problem would immediately be available. We should see that as very good news for the community and one element of "defense in-depth". And later this year we will review a plan from Edison and Dr. Singh's company (Holtec) about exactly how the whole system of "defense in depth" will work.

Second, I am becoming concerned that some members of the SONGS communities have made it extremely difficult for us to talk with experts in the field without those same experts feeling that they are going to be misquoted. I have already seen evidence of this in our dealings with the Nuclear Regulatory Commission, in our dealings with experts such as Dr. Singh, and now in our dealings with other experts. This is a horrible outcome for us because it is making experts less willing to talk with us about the full range of benefits and potential

costs of the technologies that we depend on. That will make it harder for us to have a full, informed debate about our best options. Nobody wants to deal with people who are going to treat their information in a biased way.

Third, I'm concerned that this is not the only example of misquoting and mis-information. I see in the emails after the CEP meeting copied below, for example, that I am quoted as saying that I'm a big supporter of deep borehole technologies. I am not, and I did not say that at our meeting last week. What I said — in response to a question from member of the community, Marni Magda — was that the new DOE policy on waste storage will include an explicit effort to invest in new waste disposal technologies, including deep borehole. And I said that is good news because these new technologies might emerge as alternatives or complements to facilities like Yucca Mountain. All of us in the SONGS communities have a debt to Per Peterson who has attended several of our meetings and is a widely respected expert in the community. And it is Prof. Peterson who has helped us understand why deep borehole technologies might prove helpful. So the fact that the government is now making it easier to investigate those technologies is good news, not bad news.

We are witnessing a persistent pattern of folks stringing together quotes out of context to make arguments that are deeply at odds with what the original speaker actually said or intended. For example, some members of the community seem to favor adopting a German cask design and to place those casks in a new specially-built building. Yet they conveniently ignore all the quotes from Dr. Singh or Dr. McMahon suggesting that option would be unwise. For example, Dr. Singh was asked about whether it would be a good idea to put casks in a building; he flatly said no — because a building would not increase safety and might actually make cask storage more dangerous. Yet somehow when it comes to quoting the experts who have testified, all of these inconvenient facts get ignored. I have seen this disturbing pattern on several other occasions — including in media interviews, where it is particularly important that we get our facts right. For example, some members of the community have misquoted Al Csontos and Darrell Dunn and other officials at the Nuclear Regulatory Commission. These quotes have been taken out of context to make claims that are exactly the opposite of what they intended — such as on the real risks of corrosion cracking, on how canisters are inspected, and on how NRC actually requires companies to mitigate the conditions that might, over time, lead to cracking. We in the community should be vigilant and watchful to make sure we have the best options at SONGS, but we need to do that honestly.

The extent of misquoting and characterization extends to official documents as well. For example, over the last week I have seen quoted the claim that we will need to re-spend \$1.3b on canisters based on the claim that that these will crack in 20 years. Quite apart from the falseness of the cracking claim, this argument seems almost willfully misstating what the canisters themselves cost. The \$1.3b figure is for the ENTIRE fuel handling activities at SONGS, including cost contingencies, for the next 35 years. By my estimate (the data are not published) the canister portion of that is at most \$100m to \$150m.

Fourth, and most importantly, this debate about canisters is not only technically wrongheaded but it is also creating divisions inside a community that should be rowing in the same direction. We have an urgent need to find practical solutions to move the waste out of here as soon as possible. We should be focusing on that and not on rehashing (inaccurately) past debates.

All best

David

From: Marni Magda
Date: April 25, 2015 at 12:06:18 PM PDT
To: Dan Stetson, Tim Brown , Glenn Pascall, r johnson , Ray Lutz , "San Clemente Green" , Marni Magda
Subject: Mondays CEC meeting

Hi all,

This is my take on the getting San Onofre spent fuel moved from its current planned Interim location at Camp Pendleton military base. Thank you for reading and responding.

Marni Magda

Attachments:

A CALIFORNIA INTERIM SOLUTION EXCLUSIVELY FOR CALIFORNIA STRANDED NUCLEAR FUEL April 252015.docx

From: Dan Stetson
Date: Sunday, April 26, 2015 at 7:05 AM
To: Marni Magda
Cc: "David G. Victor" , Tim Brown
Subject: Fwd: Mondays CEC meeting

Thanks Marni

I'm forwarding to David Victor so it will be part of the official record.

Dan

On 4/27/15, 11:51 AM, "Michael Callahan" wrote:

>Attached FYI is the letter from NM Gov. Martinez to Secretary Moniz.

>

>MSC

>

From: Tom Palmisano
Sent: Monday, April 27, 2015 9:19 AM
To: Manuel Camargo; Liese Mosher
Subject: FW: NM Letter

New Mexico letter to Dept of Energy supporting an interim consolidated storage facility.

We should provide this letter to the CEP members.

Tom

Attachments:

Martinex letter.pdf

From: Maureen Brown
Sent: Wednesday, April 29, 2015 3:53 PM
To: Manuel Camargo
Cc: Liese Mosher
Subject: FW: San Onofre Community Engagement Update

Manuel

Our news release today is now on songscommunity as well as Edison.com: <http://newsroom.edison.com/releases/southern-california-edison-review-of-documents-affirms-independent-san-onofre-settlement-process>

Figured you would want to consider whether to share with CEP. Not about decommissioning but more reputation.

Maureen

From: San Onofre Community Engagement On Behalf Of San Onofre Community Engagement
Sent: Wednesday, April 29, 2015 3:48 PM
To: Maureen Brown
Subject: San Onofre Community Engagement Update

[Web Version](#) | [Update preferences](#) | [Unsubscribe](#)

 [Tweet](#)  [Forward](#)



4/29/2015 Press Release

Southern California Edison Review of Documents Affirms Independent San Onofre Settlement Process

ROSEMEAD, Calif., April 29, 2015 — Documents Southern California Edison (SCE) submitted today to the California Public Utilities Commission (CPUC) show the negotiations that led to the settlement of the San Onofre nuclear plant investigation were independent and not influenced by any CPUC decision-maker.

[Read the full press release >](#)

[Edit your subscription](#) | [Unsubscribe](#)

Old Pacific Hwy,
Pendleton, CA 92058

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

From: Tom Palmisano

Sent: Wednesday, April 29, 2015 4:47 PM

To: Manuel Camargo; David G. Victor

Cc: Tom Palmisano

Subject: NEI Congratulates Holtec, NM Counties on Consent-Based Used Fuel Storage Solution

HOLTEC has announced the intent to build an interim storage facility in New Mexico based on the UMAX system.

See the link for the full article.

Tom

<http://globenewswire.com/news-release/2015/04/29/730268/10131642/en/NEI-Congratulates-Holtec-NM-Counties-on-Consent-Based-Used-Fuel-Storage-Solution.html>

WASHINGTON, April 29, 2015 (GLOBE NEWSWIRE) -- The Nuclear Energy Institute today welcomed a consent-based approach in New Mexico to manage used nuclear fuel from U.S. commercial reactors. Holtec International announced a memorandum of agreement with two New Mexico counties to establish a consolidated interim storage facility in southeastern New Mexico.

Sent using ShareThis

Sent from my iPad

>>> On 5/4/15, 2:25 PM, "Ray Lutz" wrote:

>>>

>>>> Hi David:

>>>>

>>>> 1. I want to thank you for your balanced comments at the Calif.

>>>>Energy Commission, esp. to thwart the jump to conclusions regarding

>>>>a comparison with the Ward Valley experience. Ward Valley was to

>>>>have low level waste dumped into unlined 600 ft deep trenches, and

>>>>thus by design allowing ground water to intermingle with the waste.

>>>>Comparing this with a carefully designed off-site ISFSI which is

>>>>not designed to intermingle with ground water. Certainly the

>>>>hazards are higher if an accident does occur, since there are no

>>>>accidents that really could occur with Ward Valley. But to say

>>>>that an off site ISFSI is "infinitely harder" was something I

>>>>regretted to hear, and your remarks did tend to nip that in the bud

>>>>but perhaps spoken so eloquently that I'm not sure if they got the

>>>>point.

>>>>

>>>> Despite the concerns, it is only prudent for the CEC to do this

>>>>work as the CEP is not really the right place to head up this

>>>>investigation, not matter what the outcome might be.

>>>>

>>>> The reality is that interim storage IS being established in

>>>>California, but it is not by consent, and is simply the result of

>>>>creeping approvals which have occurred while the public was asleep

>>>>at the wheel, akin to the frog in the boiling pot of water. All of

>>>>a sudden we realize we need to jump out but there is no place to

>>>>land at the moment.
>>>>
>>>> 2. Now, to balance the admiration I expressed for your performance
>>>>in #1, I must bring up a concern. This is regarding the
>>>>heavy-handed manner in which you have been slapping up members of
>>>>the community at the CEP meetings. You are holding community
>>>>members to hard and fast rules about time of their comments, do not
>>>>allow any "back and forth," but then allow responses from the
>>>>utility-convened panel to go on and on, with no rebuttal
>>>>opportunity from the community after the panel side is stated.
>>>> You call this a "two way conduit," but let's face it, the conduit
>>>>runs almost entirely one way. The three limit time limit should be
>>>>treated as a guide, not a hard and fast rule. And there is not that
>>>>much harm in letting the community have more rein in their comments
>>>>and questions.
>>>>|
>>>> suggest also that if you do answer or comment on something a
>>>>community member says, that they are allowed to make a short answer to that.
>>>> Allowing the utility convened panel to always present an opposing
>>>>point of view with no followup is not fair to speaker from the
>>>>community.
>>>>
>>>> I was also dismayed that there was no public involvement in the
>>>> paper presented at the last meeting prior to the head nodding
>>>> approval you managed to sneak in. Thus again, the conduit only ran
>>>> one way in that case. It would have been much better had you spent
>>>> a bit more time to gather public input on the proposal so that at
>>>> least you could claim that it achieved some form of public review.
>>>>
>>>> You have a great many people who are eager to help in the process.
>>>> Panels in our govt by and large have no public involvement at all.
>>>> So treasure that aspect and treat the people in the room with the
>>>> respect they deserve, even if you disagree with their opinions.
>>>>
>>>> Thanks!
>>>>
>>>> --Ray Lutz
>>>> Citizens' Oversight
>>>
>>>
>>
>

On 5/7/2015 8:18 AM, David G. Victor wrote:

>>> Dear Ray,
>>>
>>> thanks for a much for your note and for your thoughtful
>>> comments-both those of praise and criticism.
>>>
>>> Regarding your item 2, I am mindful of the concerns that you have. I
>>>have similar concerns, and I was dismayed by the public comment
>>>period at our last meeting. We've got to find a better way. But
>>>please bear with the process here since the CEP is trying to create
>>>two-way interaction at the meetings themselves yet, at the same
>>>time, we must have rules that create clear expectations and as many
>>>opportunities for different people to talk as possible. That's the

>>>purpose of the three minute rule--just as many other public meetings
>>>have similar rules. So far, because of the three-minute rule, we
>>>have heard from many different voices at these meetings and yet
>>>fully used the one-hour public comment period.

>>>

>>> Last October, we tried a new method for public comment that would
>>>allow us to collect comments of a similar theme to have a more
>>>focused conversation with more back and forth. I thought that worked
>>>well last October, but over time the efficacy of that method has
>>>been drifting away from its original intention. At our most recent
>>>meeting, less than half of the comments were on the central theme of
>>>the meeting itself, and the interaction mode between questioner in
>>>response got out of hand to such a degree that the questions
>>>weren't as focused as they could be and frankly the responses
>>>weren't either. To salvage the situation we took notes about all the
>>>major items raised and have asked Edison to prepare written
>>>responses.

>>>

>>> The original idea behind collecting comments around a common theme
>>>was to reduce the need for a hard and fast three-minute rule. To the
>>>extent that of all of us, in the future, can make that more flexible
>>>format work then we can have more back and forth at the meetings
>>>themselves. But if people use the stage as a way to point fingers
>>>and make disparaging comments that aren't actually designed for a
>>>two-way flow of information then there isn't much point to a format
>>>designed for back and forth. So any help that you and your
>>>colleagues can provide on that front would be welcome, and I will
>>>raise the same issue with the CEP at our next meeting as well.

>>>

>>> Let me assure you that I hear your concerns and we are working to
>>> make this as productive as possible—including as two-way as possible.

>>>

>>> With your permission, I would like to share this exchange of emails
>>>since it raises questions that the CEP as a whole should address.

>>>

>>> All best

>>>

>>> David

>On 5/7/15, 11:21 AM, "Ray Lutz" wrote:

>

>>David:

>>In response, I don't think the method has to change during public
>>comment a great deal. This is about your manner of cutting people off
>>and not even allowing any response from the speaker if the panel makes
>>a comment. You say "we are not going to engage in a back and forth
>>here"... The back and forth is healthy and important. Three minutes is
>>not sacred if the panel then responds for six minutes. Some public
>>meetings I attend regularly provide 5 minutes.

>>

>>Secondly, if you want to encourage a two way conduit, why not solicit
>>contributions from the community of a more substantial nature than
>>3-minute comments? You made no such solicitations for involvement
>>before the David Victor white paper nor the Victor/Brown/Stetson
>>letter to the CEC.

>>
>>If you intend to hold more head-nodding votes to approve such
>>documents in the future, the community should be able to comment on
>>those agenda items, much like any other public meeting. You had no
>>input from the community on that item and ignored the fact that I had
>>risen from my seat and had my hand up. So with all the talk of a two
>>way conduit, I can't see the acts that support the statements. Actions
>>speak louder than words. The CEP is not subject the Brown Act, but it
>>is still appropriate if you respect the rules for interaction with the public.
>>
>>You may continue to share my comments as you see fit.
>>
>>--Ray Lutz
>>Citizens' Oversight.

On 5/7/15, 11:41 AM, "David G. Victor" wrote:

>Ray
>
>Nobody is approving the document. They are allowing us to use the
>document to go gather more information about what is feasible.
>
>We are all pulling in the same direction here, Ray. Let's focus on
>that
>
>David
>
>

From: Tom Palmisano
Sent: Tuesday, May 05, 2015 10:55 AM
To: Manuel Camargo; David G. Victor ; Liese Mosher
Cc: Tom Palmisano; JAMES MADIGAN
Subject: Recent articles related to nuclear waste shipment or disposal

Manuel, David & Liese,

Attached are two recent articles we can share with the CEP, if appropriate, for general background information.

1. The first article titled "Breaking down nuclear waste as a 2-part issue" talks about the recent DOE decisions to separate commercial and DOE waste, and to separate interim storage and a permanent repository.
2. The second article titled "Test run signals start of nuclear waste shipments to Nevada" talks about shipping DOE waste to Nevada for disposal. Although this is not spent fuel, it is highly radioactive waste and illustrates some of the issues with shipping highly radioactive waste.

Provided for your information.

Tom

From: David G. Victor
Sent: Tuesday, May 05, 2015 11:52 AM
To: Tom Palmisano; Manuel Camargo; Liese Mosher
Cc: JAMES MADIGAN
Subject: Re: Recent articles related to nuclear waste shipment or disposal

Dear Tom, thanks very much for your note. These are very helpful articles. Manuel, would you please include these two articles with the next circular that we send to CEP members. All best, David

Attachments:

Breaking down nuclear waste as a 2-part issue – Las Vegas Sun News.pdf

Test run signals start of nuclear waste shipment to Nevada _ Las Vegas revi.pdf

From: Marni Magda
Date: Wednesday, May 6, 2015 at 6:02 PM
To: Dan Stetson, Tim Brown, "David G. Victor", Marni Magda
Cc: "Rob Oglesby"
Subject: Elea Holtec in New Mexico is a game changer

Dan, Tim and David,

I was about to write to the CEC about my strategies for CA interim storage when I learned about the Elea Holtec deal made April 30, 2015. It is obvious at Sec. of Energy Moniz's talk in March at the Bipartisan Policy Center that this deal was already in the budget. It is a game changer for California strategy, but I ask that you reject nuclear along the Coast of California. It is time for the NRC and NEI and EVERYONE to admit we don't know the future dangers of earthquakes, tsunamis along our coast and corrosion cracking makes the ocean a foolish location for dry storage. And of course sabotage. New Mexico can afford risks California can't. We must shut down Diablo and get all stranded fuel out of California. To say that nuclear energy is cheap or clean is a lie. Some place has to be interim storage for 300 to a million years and New Mexico is safer than any place in California if we can get the rights to transport our fuel through Arizona to New Mexico. We don't know when Fukushima will be contained. The New Mexico site will be draining the taxpayer for centuries, but it is so superior to the present solution of Camp Pendleton.

What legislation do we need? How do we get in the queue? How do we stop the expansion of Holtec at San Onofre since in 5 years New Mexico will be ready. We need to demand SCE make a new PSDAR with this new Interim location possible. We must make sure that transport as well as transfer casks are ordered for production for both Areva canisters and Holtec canisters. We should not be storing them but shipping them as we pull the assemblies out of the spent fuel pools.

I will continue to push for the Democratic Resolution but this is an amazing push forward. It is a privatized solution which I fear as its neighbor just 12 miles away at WIPP has shown, but the cities are 35 miles away and the terrain is dry and a no fly zone could be enforced.

I hope if I can be a part of pushing for this solution and making it safer, that you will include me.

Thank you.

Marni Magda

From: "David G. Victor"
Date: Thursday, May 7, 2015 at 8:11 AM
To: Marni Magda, Dan Stetson , Tim Brown
Cc: "Rob Oglesby"
Subject: Re: Elea Holtec in New Mexico is a game changer

Dear Marni

thanks so much for your note. I think you raise a large number of important questions, and one of the reasons behind asking the California Energy commission to help orchestrate a careful look at what a "California strategy" might involve is to get to the bottom of some of these questions. They include questions about what new legislation will be needed. Questions about how to sequence shipments. Questions about whether sites outside California would be appropriate. And many others.

My view is that the recent announcement about a New Mexico site should be viewed as a hypothetical project, and not yet a real project. We should view the announcement about a West Texas site in the same way. And my guess is there will be others as well. If all the stars align perfectly then maybe one of these sites could be available in a few years. But my guess is that each of these will encounter their own problems that will slow things down, not least the very important regulatory issues that are in front of the Nuclear Regulatory Commission.

I would be surprised if the appearance of these other options would allow us to eliminate the need for building a full-sized ISFSI at SONGS. indeed, it might prove very bad to sit and wait while these other sites become available and not build our own temporary dry cask storage. Because all these other sites, for various reasons, could prove impractical. That is what is happening yucca. And that's what happened as a practical matter at PFS in Utah. And if we wait for those solutions to appear and we don't move the fuel out of pools then we have chosen, in effect, the least safe option.

At least, that is how I see the issues right now, but I am mindful that there are many opinions and many uncertainties in all of this. I'm delighted to see so many people focused on practical strategies here. And we in the CEP need to do whatever is possible to help make that happen.

Over the next few months we are going to gather a lot of information about what's happening and about how consolidated interim storage might proceed, and at our next meeting will have space for discussion on those topics.

with your permission I would like to share this email exchange with the full CEP since this relates to issues that the panel should be engaged with a central way.

All best wishes, David

From: Tom Palmisano
Sent: Thursday, May 21, 2015 9:05 AM
To: David Victor; Dan Stetson; tim brown
Cc: Manuel Camargo; JAMES MADIGAN; Liese Mosher; Maureen Brown; R.O. Nichols; Tom Palmisano
Subject: Article on private Interim Waste Storage plans

David, Tim & Dan,

Attached is an article which summarizes an interview with the president of WCS, in which he discusses interim storage for spent fuel. I'd suggest we provide this to the entire CEP.

Tom

Attachments:

SNL Competition in nuclear waste storage will make facilities better WCS president says SNL.pdf