

To: Members of the SONGS Community Engagement Panel (CEP)

From: Tim Brown and David Victor

Re: Interim Assessment of the CEP's work

Date: 19 August 2014

At our last regular meeting of the CEP we agreed that the Chairman and Vice-Chairman should canvass the membership of the CEP to assess how the Panel is functioning. In July we spoke to nearly every CEP member privately and confidentially; this memo summarizes what we learned.

Overall there is an extremely high level of satisfaction with the Panel's work. Many members noted that we have been presented a large amount of information to digest and that the schedule for regulatory filings has forced us to work quickly. The presentations by Edison and the overall management of the Panel process have been universally praised. Nearly all the members found the workshops extremely useful as complements to our official meetings and most singled out the opportunity to question experts and debate among the panel members as a special value of the workshops. Some members thought we had insufficient time to get into details; a few suggested that we have longer meetings and that we find ways to shorten the formal presentations. Nearly everyone praised the diversity of viewpoints from the expert panels even when they disagreed with some of the experts. A few members urged that we have an even larger slate of experts—for example, a panel that included all cask vendors rather than just one.

We explicitly asked CEP members about the public comment period at our official meetings. Some members found that period to be unfocused and overly dominated by a few viewpoints and by comments not germane to the CEP's central purpose. Nearly everyone, especially the elected officials, underscored that this period was essential to the function of the CEP. Most members urged the chairman and vice-chairman to continue to intervene, where appropriate, to keep public comments on point and civil in tone. Some members questioned whether some form of public comment could

be included at the workshops (more on that below).

We also asked each CEP member about the evolution of our agenda. We noted that, so far, our Panel has focused on issues related to spent fuel. The vast majority of the members urged us to move on to other topics, such as emergency preparedness, so that we can look across the full range of topics that the public cares about and where we can provide meaningful input to Edison. A few members, however, urged us to stay focused on spent fuel. Most members agreed that the CEP should revisit the fuel issue no later than early 2015.

Nearly everyone expressed frustration that we in the SONGS communities must deal with the reality that spent fuel will not be removed from the site by DOE in the foreseeable future. Many CEP members, reflecting on that reality, urged that we in the CEP focus on storage options that are durable for many decades and can be adapted and adjusted in response to new information. Some members expressed concern that Edison not make cask decisions with regard to a least-cost 20 year time horizon but for the longer haul. The idea that fuel would be cooled in pools, stored briefly in casks and then moved offsite is no longer a reality. We explicitly asked each CEP member whether as a matter of policy Edison should move spent fuel from the pools into casks as soon as safe and practical. Nearly everyone agreed with that goal. A few CEP members, however, underscored that a lot is embodied in the term “safe and practical” and Edison should, of course, follow industry practice and NRC standards and not be an excessive rush to get the fuel out of the pools according to arbitrary deadlines.

From the interviews we have gleaned several points of reform and action and with this memo suggest that all of the proposed reforms be adopted:

- Ambiguity in the CEP’s public purpose. Many members noted that the public still seems unclear about the CEP’s purpose and that many of the strident comments made during the public comment period seem based on the idea that the CEP is a decision-making body in whose hands the future of the SONGS site rests. Recommendation: Begin each meeting with a brief formal statement noting that the CEP is not a decision-making body. Instead, we are designed as a two-way conduit for information between the co-owners of SONGS

and the many communities affected by the presence and closure of the plant. Victor made such a statement at the July 17th workshop and we can use that same statement for the future.

- Workshops. Our impression is that connecting a workshop to an official meeting is an extremely useful practice. We should do it whenever the topic before us requires more in-depth and technical attention. The one criticism we heard often concerned the lack of public comments or questions during the workshops. In light of the schedule, we don't think a formal public comment period would be feasible or appropriate for the workshops. But it should be possible to elicit public questions or comments in advance and then synthesize a collection (while publishing the full list) for consideration during the workshop. Recommendation: add functionality to the website that allows for public comment and input (done) and actively advertise that functionality and use it at upcoming workshops.
- Real impact. Several members questioned whether we are having a real impact on what the public knows and on Edison's decisions. Recommendation: conspicuously take stock of the major issues raised and our actions on each—identifying areas where CEP could do more and where its efforts have had tangible impact. Dan Stetson will begin that process at our next formal meeting.
- Ongoing assessment of the CEP. Many members welcomed the opportunity to take stock of our efforts and urged that we do this again every year or so. The public meetings are dominated by a few members who speak a lot and thus this format of one-on-one private conversations is useful.