

Questions from the Public Regarding San Onofre Canister Downloading / 4Q 2018 CEP Meeting

11-29-18

Q#	Source of Question	Question	Disposition	
			Covered in Presentation or Discussion	Unrelated to Downloading
1	Brady, Sarah	At the community engagement panel meeting this Thursday Nov 29 in Oceanside, please identify studies that have examined the question of if a canister is breached and the helium rushes out and air rushes in, whether there can be a zirconium fire and/or hydrogen explosion, particularly if the passive cooling is diminished.	Link on slide 44 to 3Q 2017 CEP meeting at which consequences of a canister crack was addressed	
--	Gorman, Christine	When the USNRC showed pics of the storage vault divider shell, with close ups of the inner guide ring with attached gussets, there appeared to be sloppy machining of the materials.	--	--
2	Gorman, Christine	Where the gussets attach to the inner ring of the shell, there's a lip that should not be there. If this machining and design flaw isn't corrected, it's likely to cause future problems with properly guiding a canister into the divider shell for storage. The gussets, to my understanding, are for the purpose of guiding the canister as it descends. The lip could cause the canister to be misguided.	Addressed orally	
3	Gorman, Christine	The inner ring on which the gussets are attached, appeared to have a potentially weak connection to the shell wall. Does this ring have the potential to become dislodged when pressure is placed on it, for example while the canister is jostling into place? These design flaws could potentially add to the danger and complexity of re-aligning or removing a canister that failed to descend in a properly assigned position. These are just some of the serious problems with the Holtec equipment. Add to that, the mismanagement and lack of proper training and safety procedures, it is imperative that the transfer process not be resumed. With the history of management problems and equipment problems, the entire operation should be handed over to more capable operators. Without such significant changes, it's too risky to restart to decommissioning process.	Alignment and re-training covered on slide 30; Shield ring addressed orally	

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4	Gorman, Christine	I have not been able to receive a satisfactory answer to a question I asked at a previous CEP meeting. I followed up by calling SONGS to be directed to where the information might be posted, only to learn, upon reading it, that the information was not sufficient. My concern, shared by many, is that radioactive water is released into the ocean on a regular basis without adequate monitoring, lax environmental permitting, and lack of public notice of when such releases can be expected or when they happened. The annual report on the website I was directed to was not in a user friendly form, lacked detailed information, and did not provide the necessary information for proper evaluation of the cumulative effects of the contaminants released into the ocean water that is used by the public for recreational purposes		X
5	Gorman, Christine	These releases also potentially contaminate our drinking water, now that we have de-salination plants that convert our ocean water into drinking water. I seriously don't think that any filtering or de-salinization process can remove radioactive waste. If it did, wouldn't we have a great solution for rendering harmless our radioactive waste		X
6	Gorman, Christine	The annual report also do not distinguish between waste from the decommissioning at SONGS from any waste that might be dumped from Camp Pendelton. Please look into this matter. This practice and lack of sufficient regulation and reporting is a concern expressed by several of us at CEP meetings during 2018, and perhaps earlier		X
7	Headrick, Gary	Why is there no CONTINGENCY PLAN? There must be a way to handle a situation where containment of nuclear waste can be restored after a canister fails for any reason. It makes no sense at all for the NRC to declare that it is not needed because if the workers just follow the procedures properly, such an accident will not happen. The NRC seems to be ignoring the fact that it almost did!		X Slide 44 includes link to 3Q 2015 meeting at which emergency planning was addressed

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8	Headrick, Gary	Why doesn't the NRC require a more realistic drop test, using one of the flawed shim canisters fully loaded with lead and water to see what happens? This is the first thing needing to be established before allowing Edison to proceed with moving nuclear waste.	Covered on slide 25	
9	Headrick, Gary	Why doesn't the NRC require Holtec, or another contractor, to provide a nuclear waste storage system which is at least as reliable as those used in other countries where containment can be monitored, repaired and maintained in structures that prevent radiation from getting into the environment? The current system not only lacks redundancy for a dropped canister, but also allows metal to metal contact when a canister is being lowered into the vault, which is a trigger for stress corrosion cracking.		X Referred to NRC
10	Headrick, Gary	Why doesn't Edison reject the system they purchased from Holtec immediately, based on recent revelations mentioned above? If they don't, they will nullify the warranty simply by continuing to use this flawed system without question, releasing Holtec from any liability for their inferior design.	Addressed orally	
11	Headrick, Gary	In light of dangers that the public is now keenly aware of, why doesn't the NRC require Edison to not only reinstate insurance policies (Price Anderson Act) and emergency preparedness measures, but increase these protections including real-time, publicly available radiation monitoring?		X Slide 44 includes a link to 2Q 2018 CEP meeting at which insurance coverage was addressed; Radiation monitoring on slide 42
12	Headrick, Gary	Will the NRC question Edison about a clause in their contract with HOLTEC that gave them incentives to rush completion of dry cask storage, as claimed by a whistleblower? Tom Palmisano says that this is "proprietary information", but if there is such a clause in the contract, we expect it to be removed.	Addressed orally	

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13	Headrick, Gary	What level of compensation would be available to any party who has suffered loss of life, health or property from a nuclear accident?		X Slide 44 includes a link to 2Q 2018 CEP meeting at which insurance coverage was addressed
14	Kim, Caroline	Will a hot cell be a viable method for repackaging spent fuel in order for SCE to be in compliance w/their fuel retrievability requirement?		X Addressed orally
15	Kim, Caroline	Will the State Lands Commission mandate that the EIR be RECIRCULATED to include the July and August 3 safety incidents which occurred at SONGS?	Slide 44 includes link to CSLC web page for SONGS EIR	
16	Kim, Caroline	How can the public be assured that safety incidents/event reports are filed immediately as required by federal law, given that such reporting did not occur in a timely manner with either the July safety incident or the August 3rd "near miss" event (though these events occurred during the original pubic comment period)?	Addressed orally	
17	Kim, Caroline	Because NRC has determined that all 29 canisters likely made metal-2-metal contact and are thus damaged, and in light of fact that SCE is not able to unload cans via spent fuel pools, would a HOT CELL be required for burial to resume?	Covered on slide 27	
18	Kim, Caroline	In October @ NRC meeting, NRC acknowledged that they do not YET have the ability to inspect for cracks. Given that there is NO CURRENT TECHNOLOGY to inspect the canisters and given that all 29 canisters were scratched DURING LOADING, is the NRC going to REQUIRE HOLTEC to RECALL the canisters?	Scratches addressed on slide 27	Slide 44 includes link to San Onofre website that addresses inspection technology
19	Kim, Caroline	Can you verify that the helium is properly circulating to cool radioactive waste in the 4 cans with DEFECTIVE SHIMS?		X Slide 44 includes link to 2Q 2018 meeting at which shim pin issue and thermal analysis was addressed

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20	Kim, Caroline	NRC approved emergency planning exemptions so that FEMA has no obligation to respond in event of radiological event at Sano. SCE stated "risk was low due to plant being "closed." What is the EMERGENCY RESPONSE PLAN? Given limited resources, how could local emergency services be adequate to handle urgent, radiological incidents?		X Slide 44 includes a link to 3Q 2015 CEP meeting at which emergency planning was addressed
21	Kim, Caroline	High radiological readings were detected around all 51 Ariva canisters which are now 15 yrs old. The NRC has acknowledge that once a crack has been INITIATED, that a THRU-WALL CRACK can grow within 16 yrs. Could we be anticipating the potential of through-wall cracks in any of these 51 cans in 2019?		X Slide 43 addresses recent 3 rd party radiation surveys; Slide 28 addresses timing for AREVA AMP and Holtec Inspection & Maintenance (I&M) program; Slide 44 includes link to 3Q 2017 CEP meeting at which aging management program (AMP) and chloride induced stress corrosion cracking were addressed
22	Kim, Caroline	How can you assure that the existing Ariva canisters are not currently cracking or damaged, since loaded canisters CANNOT CURRENTLY BE INSPECTED for damage NOR REPAIRED?		X Slide 44 provides a link to 3Q 2017 CEP meeting at which inspection technology was addressed
23	Kwa, Terry	What is the worst case scenario with regard to the spent fuel?	Covered on slide 25	
24	Kwa, Terry	And how is SONGS prepared to handle that?	Covered on slide 25	

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25	Langley, Charles	Has the NRC conducted an actuarial risk analysis? What does it say? Specifically, is there an actuarial assessment of financial costs to the public when a canister cracks open? I understand that the NRC views this event as being almost "impossible" but similar claims were made about the impossibility of a meltdown and radiation release at Three-Mile Island, Chernobyl, and Fukushima. Could you ask the NRC to make its peer-reviewed "worst case" analysis public?		X Referred to NRC
26	Langley, Charles	Why can't we buy nuclear waste disaster insurance? The NRC has made repeated claims that the "plant is closed and the risks are low" at the ISFSI, even though no formal peer-reviewed actuarial risk analysis has even been made publicly available (see question #1). If the risk is so low, then why is it impossible to buy homeowner or business insurance against radiation damages from San Onofre?		X
27	Langley, Charles	Will the NRC prosecute or fine the individuals responsible for the near-miss? We now know that there are at least two documented violations of Title 10 Federal laws involving the unsafe handling of nuclear waste at San Onofre.. The July 22 "near-miss" has never been reported. Yet, the NRC knew about it and kept it a secret in violation of Federal law and its own mission statement. We know this because Public Watchdogs checked all the reports from July 22, 2018 through today. Will the individual executives who made the decision to violate the law face fines or prison time for their failure to comply with Federal law? If the answer is no, then doesn't this create a classic recipe for moral hazard?	Referred to NRC	

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28	Langley, Charles	<p>Why can't the NRC enforce its own laws? On August 3 Edison failed to report a "near-miss" unsecured load event for more than a month. Federal law requires that such events be reported within as little as one hour. Yet despite this blatant highly documented violation, the NRC has done nothing to punish Edison. More alarming is the fact that on July 22, a near-miss occurred involving yet another unreported, unsecured load event in violation of the law. The NRC knew about this event, but kept it secret from the public and the media. Shortly after we published a sworn affidavit documenting the July 22 event, the NRC admitted the event happened publicly, yet the Event Notification Reports page remains silent about the July 22 "near-miss." Is there anything we can do to get our regulators to enforce their own laws?</p>	Referred to NRC	
29	Langley, Charles	<p>How many other "near-misses" have actually occurred? It appears that near-misses happen all the time, but the public and the Community Engagement panel is being kept in the dark by Edison with the full cooperation of the NRC. How do you feel about this as the CEP Chair? Can the public and your Community Engagement Panel ever trust the NRC or Edison to obey or enforce the law? (see Question 3 above).</p>	Addressed orally	
30	Langley, Charles	<p>What law enforcement agency has jurisdiction over the NRC? As observed, the NRC is not enforcing its own laws. As of today, the July 22 event still hasn't been reported on the NRC Events Notification Page. Yet curiously, the law requires that an unsecured load event must be reported within one hour. The NRC admitted it knows about it, yet it the Events Notification Page remains silent about the July 22, 2018 "near-hit." What's more, Edison waited a month-and-a-half to report the August 3 event. Is there any law enforcement agency that we can rely on to investigate the NRC's failure to perform?</p>	Referred to NRC	
31	Langley, Charles	<p>Is there anything the Community Engagement Panel can do? The facts and the record prove the NRC has been actively involved in helping Edison conceal the truth about what's happening at San Onofre. What can we as citizens do to protect ourselves from a failed regulatory agency, and a callow utility that is in willful violation of the law?</p>		X

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32	McLendon, Lee	Why is there no CONTINGENCY PLAN? There must be a way to handle a situation where containment of nuclear waste can be restored after a canister fails for any reason. It makes no sense at all for the NRC to declare that it is not needed because if the workers just follow the procedures properly, such an accident will not happen. The NRC seems to be ignoring the fact that it almost did!	(Repeat of Gary Headrick question)
33	McLendon, Lee	Why doesn't the NRC require a more realistic drop test, using one of the flawed shim canisters fully loaded with lead and water to see what happens? This is the first thing needing to be established before allowing Edison to proceed with moving nuclear waste.	(Repeat of Gary Headrick question)
34	McLendon, Lee	Why doesn't the NRC require Holtec, or another contractor, to provide a nuclear waste storage system which is at least as reliable as those used in other countries where containment can be monitored, repaired and maintained in structures that prevent radiation from getting into the environment? The current system not only lacks redundancy for a dropped canister, but also allows metal to metal contact when a canister is being lowered into the vault, which is a trigger for stress corrosion cracking.	(Repeat of Gary Headrick question)
35	McLendon, Lee	Why doesn't Edison reject the system they purchased from Holtec immediately, based on recent revelations mentioned above? If they don't, they will nullify the warranty simply by continuing to use this flawed system without question, releasing Holtec from any liability for their inferior design.	(Repeat of Gary Headrick question)
36	McLendon, Lee	In light of dangers that the public is now keenly aware of, why doesn't the NRC require Edison to not only reinstate insurance policies (Price Anderson Act) and emergency preparedness measures, but increase these protections including real-time, publicly available radiation monitoring?	(Repeat of Gary Headrick question)

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38	McLendon, Lee	What level of compensation would be available to any party who has suffered loss of life, health or property from a nuclear accident?	(Repeat of Gary Headrick question)	
--	Rose, Alex	In reviewing the 8/13/18 letter from Holtec Intl., I am curious about the statement in the 2nd paragraph that the cause of the canister potentially being dropped during loading was due to "insufficient vigilance on the part of our loading crew despite the rigorous training that is mandatorily provided to all of our nuclear craft labor and supervision." Specifically, can you advise:	--	--
39	Rose, Alex	What would you define as sufficient vigilance?	Covered on slides 29 & 30	
40	Rose, Alex	Would requiring more than two Loading Crew members decrease the likelihood of the insufficient vigilance?	Covered on slides 29 & 30	
41	Rose, Alex	How many Loading Crew members have received remedial measures & supplemental craft training, and what specifically have they received?	Covered on slides 23, 29 & 30	
42	Stone, Gene	How does SCE insure properly load the correct fuel assemblies in the correct location in the basket of the canister? That is the correct burnup and decay time for each assembly. Is there a video of this?		X
43	Stone, Gene	Does SCE have videos of this entire process from start to finish?		X
44	Stone, Gene	If excess heat buildup in the canister while in dry storage would mean the fuel cladding would deteriorate. SCE would have little recourse if that happened?		X Slide 44 includes link to 2Q 2018 CEP meeting at which thermal analysis was addressed

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45	Stone, Gene	A waste repository would never accept seriously damaged fuel?	Covered on slide 25	
46	Stone, Gene	Was that canister David Fritch spoke of (#29) inspected completely before it was loaded?	Addressed orally	
47	Stone, Gene	Does SCE have videos of this process, and will it be used for training purposes?	Covered on slides 29 & 30	
48	Stone, Gene	Is there a video of either of the two now reported accidents?	Addressed orally	
49	Stone, Gene	If canister #29 wasn't inspected does it need to be pulled out to be inspected for any damage?	Inspection timing addressed on slide 27	
50	Stone, Gene	What has SCE now done to continue loading canisters? Has the gross negligence has been addressed fully, properly and completely with all parties?	Covered on slides 29 & 30	
51	Stone, Gene	It seems clear that the training guidelines for these workers need to be reviewed and more complete training of the crews need to happen before the resumption of loading these canisters. Stop loading canisters now seems a reasonable request.	Covered on slides 29 & 30	
52	Stone, Gene	It may be necessary to have city, county or state independent people on site to monitor the actions of SCE decommissioning process who have clearly lost the trust of the people of California. Safety first cannot just be a slogan. The people now must be reassured by some means that someone has an overview of what's happening at San Onofre.		X

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53	Stone, Gene	The primary question is very technical. SCE says that the "mpc" is able to withstand a drop of 25 feet. I can't see where that is written on anything submitted to the NRC. NRC says it's an unanalyzed drop potential that was previously considered not credible, is SCE lying or at best mincing words about this?	Covered on slide 24	
54	Stone, Gene	Next, what happens if it had fallen? That needs to be analyzed by independent physicists. There are probably a number of scenarios. That's the big technical question.	Covered on slide 25	
55	Stone, Gene	Beyond that, what are the mitigating responses to the various scenarios? Does SCE have a flowchart of epic size for this? I think even the lowest level response would seriously stretch site resources not to mention the worst case?		X Slide 44 includes a link to 3Q 2015 CEP meeting at which emergency response was addressed
56	Stone, Gene	Related to the last part. What are the response plans and resources for dealing with a leaking canister? Are the procedures vetted and thorough, have site personnel trained in these procedures, have dry runs been performed? Nothing ever goes how it's planned on paper and something as simple as a damaged bolt or whatever could stop the entire process or cause hours of delay.		X Slide 44 includes a link to 3Q 2017 CEP meeting at which canister mitigation was addressed
57	Stone, Gene	How will SCE work with the OC and SD emergency response teams going forward now that it is perfectly clear that all of SoCal is still extreme dangers of a nuclear waste accident?		X Slide 44 includes a link to 3Q 2015 CEP meeting at which emergency response was addressed
58	Sutton, Ray	What 3rd party experts were involved in that analysis of the possible damage to the multipurpose canister? Holtec, the original equipment manufacturer? Others?	Covered on slide 24	
59	Sutton, Ray	Is the NRC review / analysis complete yet? I thought I heard Mr. Troy Pruett of the NRC state during the NRC Webinar on November 8th that they (the NRC) had also concluded that had the canister fallen, it would not have been damaged, and there would have been no abnormal radiation release. Was that statement just based on their preliminary review, or is their evaluation complete?	Covered on slide 24	

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60	Sutton, Ray	<p>In Mr. Palmisano's October 18th letter to the members of the Community Engagement Panel, he stated that Southern Edison's analysis concluded that had the canister (which was temporarily hung-up on the shield ring gusset) actually dropped the full 18 feet, it would have maintained its integrity. Mr. Palmisano also indicated in his letter that 3rd party independent experts agreed with that analysis, and that experts in the Nuclear Regulatory Commission were also reviewing that analysis.</p>	Covered on slide 24	
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Includes questions received by SCE as of 5 p.m. on 11-28-18