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**From:** Judy Jones

**Sent:** Monday, September 18, 2017 6:06 PM

**To:** NUCCOMM <nuccomm@songs.sce.com>

**Subject:** (External):Comments for September 14, 2017 Meeting

CEP Officers and Panel Members,

Attached are my concerns and questions primarily related to the CEP meeting on storage held on September 14th.

I do hope to see answers to all questions raised during the comment period and any others submitted that were not given time on Sep 14th on the website.

Thank you for your consideration of my questions.

Judy Jones  
San Clemente, CA  
[REDACTED]

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*Response*

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Hello Ms. Jones,

Thank you for your questions and interest in the important issues at San Onofre.

You have been thoughtful with your questions and since many of the questions have been addressed at the CEP meetings, we would like to invite you to a walking tour of the plant during which we can have further discussions. Sign up for the tours can be found by clicking [here](#). We look forward to seeing you.

Thank you,

*Esther Soto*

Decommissioning - Nuclear Organization

San Onofre Nuclear Generating Station

Southern California Edison



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## **CEP QUESTIONS and COMMENTS September 14, 2017 Meeting**

### **Introduction: My Perspective—Environmental, Safety, Transparency, Analytical**

I am Judy Jones, concerned citizen of San Clemente, and in my 21 years in San Clemente supported and active at times in various non-partisan groups including League of Women Voters, San Clemente Green, Alliance for Nuclear Responsibility, San Onofre Safety, North County Climate Change Alliance, Surfrider, and San Clemente Watershed Task Force.

My personal priority among SONGS issues is **safety**. I am most concerned with the safety of my community and all aspects that relate to that. I want the safest canisters, the best monitoring and notification systems, best backup systems, best repair systems, safest transport systems, and best emergency preparedness – all to protect the community, a safe transport corridor and clean ocean,

Another perspective I have, especially from the League of Women Voters approach to legislative positions and their involvement back to the Nuclear Waste Policy Act of 1982, is strong support for transparency and oversight by involved communities. After all, SCE is a **public** utility, which means to me the public should have some say, not just in paying our utility bills, which we have no choice about. I must compliment the objective of the Community Engagement Panel and thank you for your efforts.

Also, I've had to select vendors many times in my career being an IT consultant, analyst and project manager. When selecting a vendor, the first thing to do is determine the requirements. Of course, looking at what's available in the market is necessary, but getting input from the user – in the case of SONGS, I would think that would involve asking the community.

### **General Questions for CEP Meeting on Dry Cask Storage**

I was very pleased to learn the topic of the September 14, 2017 meeting was dry cask storage, so before viewing the meeting online, I did consider what my questions have always been about SONGS dry cask storage, some of which are beyond the defense-in-depth (DID) topic.

1. What were the major criteria used in selecting Holtec now and Areva in the past?  
What was the cost comparison among vendors?  
What was the comparison of safety features among vendors?  
How could each vendor be monitored?  
How could each vendor be repaired?  
How do vendors compare in our environment? Seismic? Sea air? Tsunami?  
--Evaluation of the above on what can be delivered, not what is under development or testing.
2. What were the assumptions for permits, warranties, etc.? Given that promises for long term storage haven't been met and interim storage doesn't exist? What would have been required (cost, time to implement, etc.) to require warranties for at least 50 years?
3. What are the warranties on the current cask storage at SONGS?  
How many years?  
What years do they expire?
4. What criteria were used in the site location of the dry storage at SONGS? Especially as it relates to a soils report? Was it known where the water table is before digging?
5. Now that the storage is slightly above ground, doesn't that reduce the safety, including visibility on Google maps to the terrorists?
6. Why would SONG contract with Holtec before they could deliver inspection and repair options?  
And, also given that we learned in the presentation Areva is using the robots and the rings, why didn't we pick the? If Holtec says they could do this by 2020, why wouldn't we wait? For only a few more years, it seems worth the wait.

## Questions Based on CEP Meeting Sep 17, 2017

The CEP meeting topics with emphasis on the dry cask storage monitoring brought up many additional questions on storage and other topics, which are listed below.

1. Do we have transport casks? I believe it was stated they are being fabricated in the next 2-3 years? So, how can we have 21 canisters ready for transport now?
2. Will the community have any input into the “experts” being selected based on the recent lawsuit settlement?
3. Is the SONGS storage intended just to last 20 years as temporary storage? Given that as a ratepayer (under SCE) and then a taxpayer (when DOE takes over), shouldn't I would like plans for the worst case for as many years as possible? Was the cost only to SCE considered? And, not really the full cost? Will it have to be re-casked, relocated, etc. by the time DOE takes over?
4. In this age of instant information capability, why aren't the monitoring results at SONGS reported daily in real time? And, can this report include what is inspected and what is not inspected (e.g. since it was commented by Tom Palmisano that inspections don't happen until 20 years on the canisters because that's what NRC requires.
5. The EPRI presentation was interesting, and nice to know the nuclear industry cooperates in research. Is there any comparable non-profit research organization that does not rely on nuclear industry funding? Could CEP hear any validation or other comments about this research from such an organization?
6. Will we be hearing how SONGS Aging Management plan compares to the guidelines of EPRI?
7. Seeing the robot technology was definitely a plus, but it gives me mixed feelings. The technology is fun, exciting, but it reinforces the feeling in the pit of my stomach that we are just guinea pigs in a “nuclear experiment.” When will any of these robots be available at SONGS?
8. If a robot does manage to inspect a cask or canister that is cracked or leaking does it then become contaminated and then can't be reused?
9. Jerry Kern asked about when additional testing after maybe an earthquake, maybe with robots, would be done, and the response was equipment, etc. would not be immediately accessible at SONGS and Tom Palmisano said, “we have lots of time.” How long would it take to get equipment on site? Would there be any equipment and skilled technical staff on site at SONGS at all times? Would the community be notified if any non-routine monitoring is required?
10. What happens if any or all of the 50 existing canisters' licensing cannot be renewed in 2020 - 2023?
11. When is the NRC “best available” canister inspection technique likely to change from visual? I understand Ring inspection is available for use by Areva?
12. The Areva inspection robot is inserted in the inlet vent, so how much of the ISFSI module can be inspected that way?
13. A question was asked about cracked canisters and transport and the answer was specific analysis would be needed on a canister by canister basis. So, has EPRI done any research on cracked canisters?
14. Can we have an aging management plan before we bury the canisters?
15. Can we get a “real time” movement report of the waste at SONGS? Into pools, into canisters, into the new storage location? Into transport canisters, etc.?

## Conclusion

David Victor and CEP Panel Members, thank you for your participation. I am looking forward to answers to these questions online since David did indicate any that would be submitted by those not able to have a chance in the Public Comments period would be answered online as well as those not responded to at the end of the September 14 meeting. I am assuming this should be in the meeting materials?