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From: nucomm@songs.sce.com [mailto:nucomm@songs.sce.com]

Sent: Thursday, November 05, 2015 2:26 PM

To: NUCCOMM

Subject: New CEP Message

This is an automated email response from Community Engagement Panel Date Sent: 11/5/2015

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Message: 1. The GAO Report from Sept. 2014 contains numerous facts which are inconsistent with evidence, documents submitted by Licensee Edison for Decommissioning Plan DP prepared by experts retained by SCE for San Onofre (SONGS 2 & 3). Facts contained in GAO Report (linked with CEP Agenda) are vital, and millions of public stakeholders in southern CA and ratepayers deserve full disclosure, and accurate analysis.

Stakeholders are disturbed that Licensee Edison appears to have knowingly withheld, or failed to fully disclose important and critical facts to CA Coastal Commission (CCC) as the Commission's basis for conditional permit approval on Oct. 06, 2015. Examples: GAO Report content and conclusions, regarding nation's lack of specific authority under existing regulations and standards defined by Nuclear Regulatory Commission (NRC), and Department of Energy (DOE). GAO Report indicates legislative authority will require extensive time for eventual Rulemakings, and public meetings, comment periods with stakeholders necessary to implement Decommission Plans for reactors in United

States, (expected to take more than a decade).

In the meantime, since far before 2013, Licensee (EDISON) applied aggressive "strong-armed"streamlining processes with regulatory agencies to prematurely accelerate permit approvals, and repeatedly engaged in inappropriate "ex-parte" communications with regulators Permitting Agencies. In many cases public stakeholders have been excluded, and deprived of meaningful opportunity for public comment, due process, equal time for speakers to present concerns at CEP, or Coastal Commission hearings.

2. Stakeholders observed that Licensee SCE deliberately MISLED the CA Coastal Commission at the October 06, 2015 Public Meeting in multiple specific areas, including authority, inapplicability of specific assurance statements made by NRC spokesperson Mark Lombard to Coastal Commission, regarding HOLTEC UMAX casks" performance capabilities, Aging Management Plan (AMP) actual service life, and the extremely exaggerated (but uncertain) timeframe expectations which Licensee's experts, nuclear and nuclear industry experts project future technological breakthroughs will advance to more than the mere "Vaporware" (non-existent) future technological capability which does not currently exist, or is realistically projected. SCE and CEP assurances are still unsupported by verifiable evidence that industry capabilities will be developed quickly enough, and future Aging Management Plans will enhance performance capabilities of HOLTEC UMAX stainless steel casks 5/8" thick stainless steel .

3. Licensee's current Decommission Plan, Budget, Schedule, Benchmarks, Phasing plans, Funding completely fails to provide contingency, or caution. Stakeholders now have evidence that Licensee Edison's Decommission Plan fails to identify readily foreseeable new infrastructure for "indefinitely prolonged" onsite storage of spent fuel at San Onofre, successful cask retrieval and safe transportation whenever DOE is prepared to accept spent fuel from San Onofre. The nuclear industry's ongoing current lack of actual operational experience, testing, and lack of verifiable evidence are an insufficient basis for conditional approval actions by Coastal Commission for a 20-year license. Conditions were applied by Coastal Commission (indemnification), which Commission lacks authority to apply.

4. Based on overwhelming evidence only now available, stakeholder(s) already filed Request for Permit Revocation, at a future noticed public meeting convened in southern California, for CA Coastal Commission to consider potential Permit Revocation.

5. Stakeholders have observed ongoing failure by Community Engagement Panel (CEP) to fully, or objectively present credible evidence from stakeholders, and independent experts outside the nuclear industry, or NRC regulator, or industry contractors, subs and vendors.

6. Besides alternatives such as Consolidated Storage, stakeholders have repeated asked CEP Panel, NRC, Coastal Commission, CPUC, and CEC to more fully examine possible use of thicker (14"-20" thick) storage casks, which are commonly used successfully in Europe, or other global locations outside United States. The other thicker ductile iron casks were specifically evaluated in website sanonofresafety.org, prepared by Donna Gilmore, with full technical sourced references outlining the technical advantages and performance capabilities of thicker casks, enclosed by actual Hardened On Site Storage (HOSS) structures to fully enclose storage casks as another physical barrier from constant exposure to marine moisture, known to cause premature cask degradation.

Stakeholders in southern California are still extremely disappointed in performance capabilities and unsupported claims by licensee, and empty assurances from regulatory agencies. Stakeholders deserve proven solutions, performance, partnership with CEP and Licensee who will actually live up to the stated goals of stewardship, service, and safety, and prove that what matters most is "People Over Profits". Prove the system robustness, redundancy in emergency systems with back up systems, operator performance capabilities, inspection capabilities by inspectors trained to report on observations only self-reported by Licensee SCE Edison.

If possible, responses by David Victor, and Tom Palisano are requested.

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