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Subject: (External):Form Submission Notification - Contact CEP

Name	patricia borchmann
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Message	<p>This email submittal is prepared within the 5-day period following the recent CEP Panel Meeting held on 03 28 19, so my public comment should be combined with other public comments that were considered during the CEP Panel Meeting. During the introduction of CEP Panel Meeting Chairperson David Victor indicated public comment submittals within 5 days would be accepted. 1. I strongly concur with comments by Speaker #2 Amy Foo, of Surfrider Foundation who summarized earlier comments conveyed last week during public meeting with California State Lands Commission to apply requirements for: . Annual sea level rise studies – H ++ . Groundwater rise studies, annual updates – H++ . Expand radiation sampling locationis at 3 sites, develop real time interactive map system for public viewing online, and provide advance notice 3 days prior to planned release of discharges into atmosphere or ocean Additionally, I concur with Amy Foo’s specific recommendations to: . Immediately require SCE to retain and maintain cooling pools in perpetuity until all spent fuel at SONGS is safely and completely removed. . Immediately require SCE to fund construction of an on-site hot cell at San Onofre, and accelerate construction details for best possible quality hot cell, and further I recommend requirement for SCE to post real financial security for it’s completion. 2. I strongly concur with comments and concerns described by Speaker #3, Mandy Sackett of Surfrider Foundation, about current absence of contingency plans or strategies</p>

	<p>to fully address ongoing real time operational issues related to scratched surfaces, gouging of casks during downloading operations, or cask distortion. While cask loading is suspended, I agree with Mandy Sackett that now is the appropriate time to require redesign for inner guide ring. 3. I concur with Speaker #13 (name unknown), who clarified Holtec's recent submittal to request change in FSAR document under CFR 72.48 is clearly unacceptable, because proposal weakens public safety, reduces safety margins, and defers action to uncertain future Aging Management Plan AMP phase, when real time action is the obvious urgent necessity and responsible need NOW, not later to assure feasibility of transportability. 4. I concur with comments and concerns described by Speaker #14, Richard Every who indicated the current Holtec storage system does not prepare waste for transport of pressurized vessels with no relief valve. Richard Every also presented credible argument that an onsite hot cell at San Onofre is an immediate necessity, and declared public demand to NRC to require SCE to accelerate immediate design for construction of world-class level, best possible quality onsite hot cell at San Onofre, and I concur with his recommendation. 5. I concur with comments and concerns described by Speaker #18, Bert Muldow who compared our current public safety threat at San Onofre with the latest news story about 2 tragic airline accidents involving the Boeing 737 max airplanes, where both Boeing and FAA regulators knew of extreme operational problems with the Boeing 737, but failed to act in time to prevent 2 disastrous airline crashes, and tremendous loss of human lives, and suffering by families. The parallel to ongoing public safety threats that currently confront over 8.4 million stakeholders in reactor communities near San Onofre is remarkably similar, since independent experts such as those retained by Samuel Lawrence Foundation prepared extensive technical studies that analyzed specific conditions at San Onofre, and concluded</p>
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	<p>catastrophic risks were underestimated by consultants retained by SCE Edison, and risks were also underestimated by regulatory agencies, that could cause hydrogen gas explosion(s) that cause catastrophic adverse human impacts, and irreparable economic damage to world's 5th largest economy. I concur with Bert Muldow's primary question that remains unanswered is why hasn't regulatory agency NRC required Licensee Edison to examine other Alternatives that are safer, and implement a spent nuclear fuel storage system alternative that will not cause catastrophic impacts, or risks? 6. I also concur with other credible speakers at the CEP Meeting on 03 28 19, including Ray Lutz (Citizens Oversight), Michael Aguirre, Jeff Steinmetz, and questions by Donna Gilmore and Gary Headrick about hydrogen gas buildup and potential for explosion at San Onofre during operational service life of inferior Holtec spent fuel storage system during short and very long term at San Onofre. J. Steinmetz and R. Lutz commented on the superficial design improvements developed following NRC Special Investigation, and the hokey rope system at top of VCT structure supposedly to prevent future cask misalignments during 'blind lift' operations during cask downloading, which is hardly 'precision alignment' technology. 7. I also observed the NRC Webinar from Monday 03 25 19 also, and did not think that NRC agency staff went far enough to fully examine extreme technical deficiencies that led to the cask 29 misalignment incident on August 3, 2018. It appears to me and many others, that NRC did not develop much more than superficial corrective actions that will not improve fundamental design defects of Holtec spent fuel storage system with inferior casks that are far too large, that are probably not retrievable, or capable of performing extreme thermal cooling functions necessary for high burn up fuel. During the NRC Webinar on 03 25 19, it was disturbing to hear regulators place more emphasis on current NRC policy that does not require 'practice tests' to deploy the same large cask sizes as</p>
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	<p>those which will be actually used onsite at San Onofre, so regulators apparently found there was no mistake made during phony 'practice test' phase using smaller dummy cask models, and left the gap between practice casks and actual casks unresolved. That is a NRC regulatory mistake, that NRC should not require the public to fix through an arduous, long process through 2.206 Petition. It's already an obvious known internal inconsistency that public expects NRC engineers and industry experts should fix through formal NRC regulations internally, and have ACRS Committee examine ! There is a lot more to be said on all these subjects, but I am out of time so I appreciate having my comments combined with other CEP Public Comments, and public is looking forward to getting answers to reasonable questions and comments. Please advise when answers will be posted online. Please confirm your receipt of my comments for CEP Panel followup. Thank you for thoughtful consideration. patricia borchmann [REDACTED]</p>
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