Questions from the Public

(Submitted prior to and following the 1Q CEP Meeting 3-28-19)

Q#	Source of Question	Question	Disposition	
			SCE Response Provided	Duplicate Question or Forwarded to NRC
1	**Joe M.**	**Is Edison planning to cooperate with reputable organizations to implement monitoring of radiation around the ISFSI or the generating station?** Safecast is prepared to do such monitoring.	**X**	
2	**Elijah G.**	Eric Simpson has reported the training canisters used in the initial download were smaller than the ones to be used. **Do you think using a canister that was not the actual size led to the misalignment of the canister on August 3rd 2018?**	**X**	
3	**David W.**	**What is the earthquake rating of the waste storage enclosure where the canisters are stored?**	**X**	
4	**Rich V.**	**What is common sense safety?**		**Additional information (background or context) is required to respond**
5	**Susan (no last name given)**	**What is the corrosion standard used to determine acceptability? Is desert, mountain environments?** There are several environmental variables. Ocean environments with salt and sand is a different variable that other locations. Sea air accelerates corrosion.	**X**	
6	**Steven V.**	**How are canisters inspected for deterioration and leaks?**	**X**	
7	**Richard G.**	**Do you have public access to transporting procedures? Are there Reg Guides for transporting?** How about railroad procedures. Would like questions answered if I do not get to speak.	**X**	

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8	**Jeff S.**	**Why won't the NRC provide the radiation readings from the exhaust vents of the AREVA canisters?** The public has asked for this information several times.		**X**
9	**Michelle A.**	**1.** The question of ASME certification on the Holtec Canisters was asked at the end of the CEP meeting, but not answered. **Please clarify whether or not Holtec Canisters have an ASME N3 Certification stamp for containers storing nuclear materials.** Final note: At the close of the March 28, 2019 SONGS CEP meeting, the question was raised whether or not the Holtec canisters are ASME N3 stamped. There seemed to be confusion. Holtec prides itself in meeting and surpassing ASME standards in its literature, etc. But Holtec's FSAR states that the answer is 'No'. (see attachment in link below) The canisters are pressure vessels, and ASME will not certify a pressure vessel that does not have a pressure relief valve. from Holtec's FSAR: https://www.nrc.gov/docs/ML1619/ML16193A339.pdf	**X**	
10	**Michelle A.**	**2.** Canister 30 is loaded with waste but not in a concrete silo. Based on Holtec's letter on 3/16 requesting the NRC make a decision quickly because the loaded transfer cask is now stranded inside a building. **Can you please let us know what is being done with canister 30?**		**Duplicate (The SCE response to Q11 below provides the answer to this question)**
11	**Kale W.**	**1. What is the path forward for Canister #30?** According to Holtec's Kris Singh, "The loaded transfer cask stranded inside the Fuel Building is one of several compelling reasons that beckon us for an urgent regulatory engagement." https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19077A021 That Holtec considers this an urgent matter implies there may be a problem with short term storage of a canister in a Transfer Cask. Edison has still not submitted an Event Report regarding stranded Canister #30. And, it is very disappointing that Tom Palmisano did not update the public on Canister #30 during his presentation at the March 28 CEP meeting. Canister #30 (presumably) has been stored in a Transfer Cask for 8 months already. It doesn't seem safe or prudent to load the canister into the ISFSI or to return the fuel to the	**X**	

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		pool. The NRC has determined that downloading the canister into the Holtec ISFSI would result in damage to the canister, https://www.nrc.gov/reactors/operating/ops-experience/songs-spec-insp/faq.pdf and Palmisano has explained Edison is not able to return fuel from the canister to the pool due to re-flooding issues. https://youtu.be/mjgna2atn7Y		
12	**Kale W.**	**2. Please present any NRC documents approving the use of a Transfer Cask for storing a canister of spent fuel waste.**	**X**	
13	**Kale W.**	**3. Please present safety analysis reports (links with page and sections) that have analyzed storage of canisters of fuel waste in Transfer Casks. Please include thermal analysis.** We now have 29 loaded canisters that are scraped and gouged. The public deserves an intact nuclear waste storage system AND clarification on Edison's contingency plans. Edison has often stated a failed canister will be put into a larger Cask but there appears to be no technical basis for this for hot canisters.		**Duplicate (Answer provided in response to Q12)**
14	**Kale W.**	**4. Please identify what Cask is approved by the NRC to store or transport a canister that is potentially leaking, overheating, or containing damaged fuel.**	**X**	
15	**Kale W.**	**5. Please show documents with safety analysis and thermal analysis for the Transport Cask.**		**Duplicate (Answer provided in response to Q12)**
16	**Kale W.**	**6. Is such a Cask onsite at San Onofre?** (refer to #4 above re: transport cask) After the 'near-drop' incident, an NRC spokesperson stated that if a canister had actually dropped, the canister would have been transported to a facility for the fuel to be inspected.	**X**	

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17	Kale W.	**7. What facility would a canister be taken to for inspecting and handling Damaged Fuel?** Edison has referenced MPR's September 2017 White Paper to show that fuel can be safely managed and a canister can be replaced, by shipping it to the Test Area North Hot Cell in Idaho. pg. 20 https://sanonofresafety.files.wordpress.com/2018/08/pre-read_songs_used_fuel_management_did_white_paper.pdf But this Hot Cell was destroyed in 2007. https://youtu.be/P_4eQ41ttPQ	X	
18	Kale W.	**8. Is Edison's Defense in Depth relying on a non-existent hot cell...??**	X	
19	Kale W.	**9. Does a Hot Cell exist in the U.S. capable of transferring fuel assemblies from one large canister to another? If so, where?**	X	
20	Kale W.	**10. If Edison intends to use the pool as a method of retrieving fuel from a canister, please present NRC approved re-flooding analysis.** (Palmisano has referenced a thick-wall Cask at Peach Bottom where (cooler) fuel was returned to the pool.) Edison plans to demolish the spent fuel pool and the NRC is allowing no pool on site. But this is based on assumptions that nothing can go wrong with the canister storage. Both the NRC and Edison have admitted either a pool or a hot cell are necessary to retrieve or transfer fuel. Edison should not, and EDISON SHOULD NOT BE ALLOWED TO DESTROY POOL until they have a Hot Cell on site.	X	
21	Kale W.	**11. When can we expect Edison's Event Report for Canister 30?**	X	
22	Kale W.	**12. Can we expect an Event Report for the canister loading problem of July 22, 2019?**	X	

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23	Kale W.	**13. Can we expect an Event Report for the loading problems resulting in damaged canisters?** Surely the problem with centering the canisters and the resulting 'metal to metal' damage should have been considered a reportable event. Had this been reported, our current problem of 29 loaded damaged canisters could possibly have been avoided. Had the loading problem of July 22nd been reported, quite probably the Aug 3rd 'near-drop' incident would have been averted.	X	
24	Kale W.	**14.** Both the NRC and Edison were quoted as stating that the beachside nuclear waste storage at San Onofre presents "zero risk" of a radiological impact outside the boundaries of SONGS. **What risk analysis was used to proclaim this 'zero risk'?** https://www.thecoastnews.com/san-onofre-officials-no-risk-of-widespread-radiological-catastrophe/	X	
25	Kale W.	**15. Please Identify what Category of waste the NRC and Edison consider the spent fuel waste to be.** https://www.nrc.gov/reading-rm/basic-ref/glossary/category-of-radioactive-sources.html The International Atomic Energy Agency's Code of Conduct on the Safety and Security of Radioactive Sources defines the five categories for radiation sources to help ensure that sufficient controls are being used to achieve safety and security: • Category 1 sources, if not safely or securely managed, would be likely to cause permanent injury to a person who handled them or was otherwise in contact with them for more than a few minutes. It would probably be fatal to be close to this amount of unshielded material for a period of a few minutes to an hour. These sources are typically used in radiothermal generators, irradiators, and radiation teletherapy. • Category 2 sources, if not safely or securely managed, could cause permanent injury to a person who handled them or was otherwise in contact with them for a short time (minutes to hours). It could possibly be fatal to be close to this amount of unshielded radioactive material for a period of hours to days. These sources are typically used in industrial gamma radiography, high- and medium-dose rate brachytherapy, and radiography.	X	

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		• Category 3 sources, if not safely or securely managed, could cause permanent injury to a person who handled them or was otherwise in contact with them for hours. It could possibly—although it is unlikely to—be fatal to be close to this amount of unshielded radioactive material for a period of days to weeks. These sources are typically used in fixed industrial gauges such as level gauges, dredger gauges, conveyor gauges, spinning pipe gauges, and well-logging gauges. • Category 4 sources, if not safely managed or securely protected, could possibly cause temporary injury to someone who handled them or was otherwise in contact with or close to them for a period of many weeks, though this is unlikely. It is very unlikely anyone would be permanently injured by this amount of radioactive material. These sources are typically used in fixed or portable gauges, static eliminators, or low-dose brachytherapy. • Category 5 sources cannot cause permanent injury. They are used in x-ray fluorescence devices and electron capture devices.		
26	**Kale W.**	**How much will the fuel handling hot cell facility cost?** (Question submitted April 22, 2019 via e-mail and after the CEP meeting on March 28, 2019)	**X**	