I. Details of Released Photographs

Pages of the proprietary SONGS report containing the photographs were included as part of Exhibit 10 from the “DECLARATION OF MICHAEL J. AGUIRRE IN SUPPORT OF MOTION TO ENFORCE SETTLEMENT AGREEMENT PURSUANT TO CAL. CODE CIV. PROC. § 664.6, in the case of CITIZENS OVERSIGHT, INC., et al., Petitioners and Plaintiffs, v. CALIFORNIA COASTAL COMMISSION, et al., Case No. 37-2015-00037137-CU-WM-CTL,”, filed on October 7, 2019. There are nine photographs in total in this Exhibit 10. The following is a description of what is depicted in each of these nine photographs:

1. Page 11 of the report (MPC 64 Quadrant 3 between Seismic restraints 5 & 6, 3/22/2019 1:04 PM)

This picture is of a mark left on the canister surface as a result of contact between the canister and the shield ring, which is made of carbon steel. The mark was examined and, as shown on page 11, has a maximum depth of 12/1000ths of an inch.
2. Page 12 of the report (MPC 64 Quadrant 3 between Seismic restraints 5 & 6, 3/22/2019 1:09 PM)

The picture is of wear marks caused by contact between the canister and the shield ring. This mark has a maximum depth of 9/1000ths of an inch.
3. Page 12 of the report (MPC 64 Quadrant 3 between Seismic restraints 5 & 6, 3/22/2019 1:01 PM)

The picture is of wear marks caused by contact between the canister and the shield ring. This mark has a maximum depth of 9/1000ths of an inch.
4. Page 13 of the report (MPC 64 Quadrant 3 between Seismic restraints 5 & 6, 3/22/2019 1:02 PM)

The picture is of a wear mark caused by contact between the canister and the shield ring. This mark has a maximum height of 9/1000ths of an inch, and a maximum depth of less than 9/1000ths of an inch. This mark is a deposit of material from the shield ring onto the canister.
5. Page 14 of the report (MPC 64 Quadrant 3 between Seismic restraints 6 & 7, 3/22/2019 1:17 PM)

The picture is of a wear mark caused by contact between the canister and the shield ring. This mark has a maximum depth of 11/1000ths of an inch.
6. Page 15 of the report (MPC 64 Quadrant 4 between Seismic restraints 7 & 8, 3/22/2019 1:31 PM)

The picture is of a wear mark caused by contact between the canister and the shield ring. This mark has a maximum depth of 3/1000ths of an inch.
7. Page 16 of the report (MPC 72 between Seismic restraints 1 & 2, 3/23/2019 10:01 AM)

The picture is of a minor surface blemish that is material deposited on the canister surface resulting from contact between the canister and the shield ring. This blemish has no depth; it is the deposit of material from the shield ring on the surface of the canister.

The picture is of a wear mark caused by contact between the canister and a seismic restraint. This mark has a maximum depth of 16/1000ths of an inch.

The picture is of a wear mark caused by contact between the canister and a seismic restraint. This mark has a maximum depth of 26/1000ths of an inch and represents the extent of observed scratching and is the deepest mark observed in all of the inspection of eight SONGS canisters in spring 2019.
II. Conclusion

NRC inspectors were present during the visual assessments at SONGS and have examined the data.

In its supplemental inspection report, the NRC wrote “The inspectors concluded that the issues related to possible corrosion, pitting, and CISCC (chloride-induced stress corrosion cracking) on the canister did not pose an immediate safety concern nor immediately affect any of the system’s design basis functions and could be adequately monitored and addressed as part of the licensee’s ageing management program.” (NRC Supplemental Inspection Report of July 9, 2019 at page 34).

Upon discovery, these observances were noted in the SONGS corrective action program and are being tracked for inclusion into the dry storage aging management program. These visual assessments will enable SONGS engineers, as part of the aging management program, to revisit the surface irregularities and wear marks in the future.