

THE COALITION TO DECOMMISSION SAN ONOFRE

The Honorable Barbara Boxer
Chairman, Committee on Environment and Public Works
United States Senate
Washington, D.C. 20510
Via Fax to: 202/224-1273

The Honorable Henry Waxman
Ranking Member, Committee on Energy and Commerce
United States House of Representatives
2322 Rayburn House Office Building
Washington, D.C. 20515
Via Fax to: (202) 225-4099

April 1, 2013

Dear Chairman Boxer and Ranking Member Waxman:

The *Coalition to Decommission San Onofre* is comprised of community-based, grassroots organizations in San Diego and Orange Counties concerned for the safety of 8.5 million residents living within 50 miles of the defective San Onofre nuclear reactors, and for the economy of Southern California. These organizations include: Citizens Oversight, Earthkeepers San Diego, the Peace Resource Center of San Diego, San Clemente Green, SanOnofreSafety.org, and Women Occupy San Diego.

Today, we join with national, regional and California statewide organizations in asking for your leadership to stop Southern California Edison's latest attempt to circumvent public scrutiny of its mismanagement of the defective San Onofre nuclear reactors.

We are deeply appreciative of your attention and leadership to date on issues related to the San Onofre nuclear reactors. Like many other organizations and individuals in Southern California, we are very skeptical about Edison's recent announcement that they are considering a voluntary license amendment request. **On the surface, this seems to be exactly what we and other community-based organizations, local elected bodies and officials have requested. HOWEVER, we see it as no more than another end run around federal regulations in order to expedite restart of their defective reactor.** Specifically, Edison has indicated their intention to apply for a "No Significant Hazard Consideration" (NSHC) for this license amendment, similar to a finding of "No Significant Impact" under the National Environmental Policy Act (NEPA). This is nothing more than another regulatory loophole that Edison is attempting to slip through. We understand that **an NSHC finding for this proposed license amendment would effectively strip the public of a meaningful role and necessary independent experts in a formal license amendment hearing that we are guaranteed under federal law, and which we have demanded.** If the NRC acquiesces to Edison's demand for such a finding, it is unassailable – meaning any hearing that takes place would be no more than a dog and pony show; it could take place *after* the license amendment has been granted and would have no impact on the license amendment whatsoever – even if independent experts demonstrate that the amendment does pose more than a minor increase in the risk of an accident.

Edison President Ronald Litzinger said recently, "We want to do every responsible thing we can do to get Unit 2 up and running safely before the summer heat hits our region. While the NRC continues to review the technical materials we've submitted, we're considering a request for a license amendment so that we can pursue the best path to safe restart while avoiding unnecessary delays." The "unnecessary delays" to which he refers are in-depth technical inquiries into the veracity of Edison's claims of safety and compliance with federal regulations. **Edison is asking NRC staff to move the process for restart forward, so that they can be up and running by summer – during peak demand when profits are greatest – before the NRC has even completed its technical review. How "responsible" is THAT?**

San Onofre hasn't been "the largest source of baseload generation and voltage support in the region," as Edison repeatedly claims, for 14 months and counting, and the CA Independent System Operator (ISO) says we'll do just fine without it for the second Southern California summer upcoming. For example, voltage support will be provided by retrofitting the retired, Edison-owned Huntington Beach power plant as a "synchronous condenser" -- thankfully, CA officials and the Federal Energy Regulatory Commission pushed through obstruction and this wise plan is being carried out for operation in June.

Per the CA Energy Commission, despite increased population and more appliances consuming power in homes and businesses, energy efficiency standards have helped keep per capita electricity consumption in California flat for the past 30 years. **California's per capita electricity consumption has remained constant at approximately 7,000 kilowatt-hours/year (kWh) for the last 30 years due in large part to strict standards for homes and appliances.** The rest of the U.S. has increased 40 percent (to roughly 12,000 kWh/year per person). And there is even more savings to be gained through additional advances in energy efficiency as well as conservation by users. Not to mention the boom in rooftop solar installations, with San Diego County leading the state.

Edison needs to stop with the Chicken Little routine -- the sky is NOT falling. The 21st Century is just moving forward.

A rubberstamp finding of no significant hazard by the NRC would be wholly inappropriate for restarting a nuclear reactor that has two of the most damaged and defective steam generators in the history of the US nuclear industry – the other two being in its twin reactor, San Onofre Unit 3, which Edison admits are experiencing a globally unique tube damage phenomenon. This request on the part of Edison is indicative of a corporate culture that sets aside safety concerns in the interest of expediency and profits – a culture that was clearly demonstrated by the revelations in the recently released MHI documents that showed they did just that when originally designing these defective replacement steam generators. **Their desire to gamble on safety in order to rush forward for greatest profits placed the lives and livelihoods of the 8.5 million people living near these reactors at significant and unacceptable risk. Edison must not be allowed to do so again.**

Lastly, the NRC has announced that a meeting between the NRC and Edison to discuss the license amendment and NSHC is to be held April 3 in Rockville, MD. **It is fundamentally unacceptable to have this meeting to discuss such a critical issue on the opposite coast from the communities most impacted. The meeting ought to be held in Southern California where our neighbors and we can participate.**

In sum, we respectfully request that in your critical oversight capacity, you ensure that the right of citizens to a full, adjudicatory public hearing required for a thorough license amendment process is upheld, that the NRC reject Edison's NSHC request, and that the upcoming meeting to address Edison's license amendment request take place in Southern California.

Sincerely,

THE COALITION TO DECOMMISSION SAN ONOFRE

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SanOnofreSafety.org: Donna Gilmore, donnagilmore@gmail.com / 949-204-7794

Women Occupy San Diego: Martha Sullivan, marthasullivan@mac.com / 858-945-6273

Cc: *Senator Diane Feinstein, via Fax to: (202) 228-3954*

Allison M. Macfarlane, Chair of the U.S. Nuclear Regulatory Commission, via Fax to: 301/415-3504

R. William Borchardt, Executive Director for Operations, NRC, via Fax to: 301/415-2162

Eric Leeds, Director, Nuclear Reactor Regulation, NRC, via Fax to: 301/415-8333

Arthur Howell, Regional Administrator, Region IV, NRC, via Fax to: 817/200-1122

Daniel Dorman, Co-Chair, SONGS Oversight Panel, NRC, via Fax to: 301/415-8333