

August 8, 2018

TO: State Lands Commission
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RE: SONGS Decommissioning Project Draft EIR
comments (San Onofre)

There are many false assumptions, inconsistencies, incorrect information and conclusions based on non-factual information in the State Lands SONGS Decommissioning Project Draft EIR. It requires a reevaluation and recirculation.

A “No Project” recommendation is the only environmentally sound conclusion at this time, once you know the facts.

The EIR claim that it is “speculation” that canisters may need to be reloaded is based on EIR false assumptions and contradicting information within the EIR itself. The pools must be retained and not eliminated from the scope of the EIR.

Southern California Edison’s (SCE) current NRC license requires using the spent fuel pools to unload defective or leaking canisters. The conduits in the ocean are needed for cooling the pools. They should remain functional. SCE implemented a “fish aquarium” chiller system in lieu of using the once-through cooling system, but that was approved for only short-term use.

Since the fuel will remain on the site for decades, if not centuries, (as the EIR states) a pool or a hot cell is needed to replace aging or otherwise defective canisters.

The NRC NUREG-1927 (Rev 1), states canisters with 75% through-wall cracks must be taken out of service. A pool or hot cell is required to do this.

Given that defective canisters were delivered to San Onofre, it is not “speculative” as the EIR states, that canisters will need to be unloaded.

And the NRC admits once a crack starts in a thin-wall canister (only 5/8” thick), it can grow through the wall in **16 years**. A Diablo Canyon Holtec canister was found to have a **2-year old canister** with all the conditions for cracking. This is critical information that should not be ignored. San Onofre canisters are up to **15 years old**. You do the math.

It would be extremely beneficial to California residents and other stakeholders that California elected official and regulators convene a fact-finding workshop with all agencies that have regulatory or other legal authority over the San Onofre facility with selected citizens who have facts that apparently are not



Actual Fukushima City Park Sign translated into English

being shared with our state government and others. This is too major an issue to decide in a piecemeal fashion.

The SCE Settlement Agreement with Citizen's Oversight is a private agreement with SCE. The Coastal Commission is not a party to that agreement and did not agree to this settlement. It should not be used as any justification for this EIR. It basically lets Edison do whatever they want that is "commercially viable". This misinformation is used throughout this EIR.

On Page ES-5 and elsewhere the EIR admits the nuclear waste may need to be repackaged, whether for transport or other problems with the canisters. SCE's NRC Certificate of Compliance (license) requires the ability to unload the spent fuel assemblies back into the spent fuel pool. Tom Palmisano, SCE, admitted in a Community Engagement Panel Meeting (CEP) that they have no ability to do this and no other facility has done this with these thin-wall canisters. Therefore, SCE is out of compliance with their NRC license. The EIR process should stop until this is resolved.

The only other method to unload canisters and load into another container is in a hot cell (dry fuel handling facility filled with an inert gas so nothing explodes). However, there are none in the US large enough to do this. SCE has no plans to build a hot cell.

The "expert" SCE used to claim they have an adequate plan is MPR Associates. MPR Associates claimed it is feasible to transport a cracking or leaking canister to the Idaho National Lab Test Area North "hot cell" facility. **MPR's own reference stated this hot cell was destroyed in 2007.** And the NRC has not approved a transport cask for this purpose.

MPR Associates are the same "experts" that stated the four defectively designed Holtec canisters, currently loaded with spent nuclear fuel waste at San Onofre, are safe. These are the canisters with the defective basket shims, needed for structural stability and thermal cooling of the spent fuel. SCE admitted they do not know if these canisters can be safely transported.

This is just a partial list of issues. More will follow with technical references.

The Fukushima Park sign is an actual sign in Japan (translated into English). Suggest the EIR used this sign as inspiration for the kind of signs we should have near the San Onofre site and at the State Park and beaches.

RECOMMENDATIONS

A "No Project" recommendation is the only environmentally sound conclusion at this time, once you know the facts. The spent fuel pools and conduits must be retained until the spent nuclear fuel waste is removed from the site. The EIR claim that it is "speculation" that canisters may need to be reloaded is based on EIR false assumptions and contradicting information within the EIR itself. This EIR is filled with false assumptions, speculation, and conflicting and incomplete information. This EIR project should be halted until these issues are resolved. This will require a reevaluation and recirculation.