San Onofre Predecisional Enforcement Conference
January 24, 2019
Webinar Public Questions Transcript

NOTE: This document contains all of the questions, comments, and feedback provided by the registered attendees via the question feature for the NRC's San Onofre Predecisional Enforcement Conference (PEC) Webinar, which was held on January 24, 2019. With five exceptions noted below, the questions, comments, and feedback are provided as they were received by the NRC, with no corrections made to grammar, punctuation, spelling, or language. For the five exceptions, the comments contained information that was considered Sensitive Personally Identifiable Information, therefore these five comments were redacted and are marked **[REDACTED]**.

- Even after NRC 'urged' SCE to report July 22 loading event SCE neglected to ID it. Since SCE neglected to report so corrective action could have been taken eliminating any possibility of an Aug. 3rd event to occur. Will NRC consider SCE's failure to ID July precursor event in determining violation significance classification?
- Why is there not an icon on SCE's 'Corrective Action' circle diagram for NRC Reporting?!
- SCE buried the first 4 (four) cans with a design for which Holtec neglected to apply to the NRC for a 'Certificate of Compliance' and therefore potentially buried out of NRC compliance. If bolt/shims in those 4 cans after have broken after their burial, combined with: 1) scratches during loading that may prompt stress corrosion cracking process 2. Absence of underground monitoring 3. SCE's inability to retrieve those cans per Palmisano 4. SCE's inability to inspect progress stress corrosion cracking due to scratches; What steps will NRC require for above-ground independent radiological monitoring and measurements?
- Where are SCE's scientfic studies to verify that damaging all canisters is not a serious enough issue to stop using the defective Holtec loading system?
- Where are the scientific studies to verify Doug Bauder's claims that dropping a fully loaded 54 ton canister 18 feet will not result in a breach and a SNF critcality?
- Isn't the root cause of the near drop accident due to defective Holtec engineering and defective hardware, and not worker training?
- Emergency responders require reatime information from SCE in order to protect the public surrounding the facility. How does witholding information for several days about a stuck canister 18 feet above the ground and near drop, proivide for maximum safety for workers on site and for the public? Why does the NRC not hold SCE accountable for this breach of good judgement and breach of the public's trust?
- When will containment containers be able to be moved to a different location? Who will be responsible SCE or USNRC?
- What is the safety plan, and region wide evacuation plan for canister drop and leakage?
- Are there any Political Representatives at this meeting? I feel the penalities for the 2 mistakes already made have been too minimum. Better Training, safer equipment & monitoring (live & recorded) should be manditory!
- If a canister is scratched or damaged on placement can they, do they, and how, remove the canister from storage area for inspection? To measure and monitor scratches & damages.
- Why didn't the site supervisor bring back up the proceedure video(shown previously) when explaining new downloading proceedures, personnel, equipment?

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- Thanks for taking a break.
- Please explain abbreviations "MTC" damage to canister. Again How would they get canister back out if needed? When?
- Can we get a comment form sent to us? (my Printer not working) **[REDACTED]**
- Thank YOU! for having the meeting/webinar! Have a great weekend! Hope you can go @FarmersInsOpen San Diego!
- Why is video and audio so low quality? The NRC surely could do better.
- Since prevention of a significant release of radioactivity is all important, why does the NRC choose to postpone until 2020 the necessity to definitely characterize the depth of the gouges caused to all canisters? And to determine if the seaside corrosion rate will be accelerated?
- The corrosion rate can be determined before 2020 by competent engineers.
- If the canister had dropped the 18 feet, wouldn't the impact of the heavy canister hitting against the bottom of the cask create some type of energy, heat or sparks inside the cask? Was this taken into consideration?
- My name is **[REDACTED]**, no affiliation just a concerned citizen.
- They used a thinner cast to test it ability to stand up to the fall. Why did they not use the same thickness which would weigh the same and act the same.
- Just to clarify... is SCE saying that the Rigger involved in the August 23, 2018 incident was not a trained Rigger?
- If not a trained Rigger, what was that individual's specialty and why was he choosen?
- In NRC's first webinar, they reported "During downloading operations, San Onofre frequently experienced teh bottoms of canisters getting caught on the shield ring." Is SCE only admitting to the one previous incident on July 22, 2018?
- In SCE's slide 19 they mention some possible fuel damage. Yet on the next slide (20) the fuel bundles remain in their cells and we get the impression that there is no fuel damage. What type of fuel damage was postulated in slide 19 - pin hole, some denting of fuel cladding, internal cracking of fuel pellets, etc.???
- Audio is very scratch. Hard to hear.
- Where is issue of damaging (gouging) all canisters loaded in Holtec holes? When is this issue being address?
- how thick is the lead shield on transfer cask?
- what about damage to contents in canister drop?
- who is Edison's 3rd party doing eval?
- Will NRC post SCE and other analysis done by various parties, including Holtec?
- Will camera be able to see shield to avoid bottom hitting shield or will jiggling past guide ring still be required? It seems with camera location, that won't be possible.
- pls show visual of where camera will be located.
- No one can inspect or characterize the defects (e.g., gouges) per NRC staff to NRC Commissioners in recent NRC meeting. And in hotter canisters, cracks grow much faster. No guarantee this problem will be solved. Make them keep the pool. Don't let them load more canisters.

- Bad Holtec design causing gouging problem. Are you going to allow this in New Mexico? System must be replaced and used as a cautionary tale.
- How can they recover from a leaking canister?
- Don't like this format. Rather have you have a local public meeting. Frustrating
- Pubic Comment for NRC Hearing:
  In the recently released book, ""Confessions of a Rogue Nuclear Regulator"", former Chairman of the NRC, Dr. Gregory Jaczko, makes two things perfectly clear. One is that there are some incredibly well informed and well intentioned people at the NRC who are undoubtedly dedicated to public safety as their primary mission. The other is that the nuclear industry holds far too much sway over those people, using lobbyists in Congress to make sure that they get what is best for their bottom line.
  As we witness these proceedings, wondering if history will reflect on us kindly or with disdain, we must all keep in mind that the system is currently rigged against us, and that safety can only be achieved by compensating for this extreme imbalance. A reasonably cynical public must be reassured that our safety does indeed come first. So far, there has been much evidence to the contrary.
  We are justifiably alarmed about the faulty HOLTEC system approved by the NRC and the lack of oversight by inspectors over the poor implementation of that system by Edison. We do not blindly accept that there was no threat to the public or workers at the plant if the snagged 50 ton canister had fallen 18 feet to the concrete floor below. We do not believe the claim that metal to metal contact is insignificant as the canister gets gouged on its way down into the silo. And we do not understand how a design change intended to account for extra heat loads is no longer a factor considering that the new supporting shim pins have proven to be defective and easily bent or broken.
  As the former head of the NRC has stated when it came to learning the lessons from Fukushima, instead of focusing on safety, ""the drumbeat just continued: Don't stop. Don't stop. Don't stop."" As a representative of nearly 5000 concerned citizens living near San Onofre, I'm saying Do stop. Do stop. Do stop! Take the time to make sure we are getting this right. Do an updated drop test with a true facsimile of these canisters. Retrieve a lowered canister to inspect the gouges. Insist on a contingency plan to be at the ready, should a canister need to be reloaded for any reason.
  These are the common sense expectations the public has of you. Stand up to the industry and do the job you have pledged to do, before it is too late. If the entire system must be replaced, have the courage to say so. Our fate depends on it.
- How was the determination made that the damage to the potential damage to the fuel would not have affected the cooling geometry within the canister?
- It seems that it would be prudent to check for radiation in the event of a canister drop, even though SCE says it is impossible for there to be release of radiation.
- If **[REDACTED]**, would Edison have ever notified the NRC?
- AUDIO NOT CLEAR!
- Please have speakers use microphones! HORRIBLE SOUND
- It may be on my side. Okay now

- thats better
- Did the analysis of the canister drop assume a flat contact on the bottom or did you assume that it probably would strike one corner a bit more than other?
  NUREG-1864 said the internal damage would have been 100%. Did your analysis agree with this earlier analysis? Did you analyze if the fuel may have combined and created a critical reaction or possible explosion?
  Why is that that NUREG-1864 said there was a 28% chance of canister breach and radiological release while your analysis says 0%?
  The LS-DYNA modeling summary does not provide enough information for the public to reproduce the drop simulation to check your work. Are you willing to ask Holtec to release their design information so the public can perform our own simulation?
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- Did you analyze why this problem was not anticipated and we require a near-miss accident and whistle-blower to get it addressed?
- Since the transfer cask is bolted to the top of the mating device, why is it that the shield ring can be hit at all? Is it because there is a lot of space in the transfer cask, or because the alignment of the mating device was not very good?
- Why is it that the NRC does not consider the design of the shield ring a design defect that should be corrected? Why rely on intense training just to cover up a bad engineering design?
- Why do they not use laser positioning to detect the exact location of the canister being downloaded?
- I object! Please go through the slides
- Video did not show the use of the tag line
- SCE says the problem was "self revealed" but in fact it took a whistle-blower to reveal it.
- Why not use little metal wheels so the canister can be lowered without scratches? This is another design defect.
- can'thear palmisano
- Cant hear palmisano
- Please have Tom speak into microphone
- This is **[REDACTED]**, Citizens Oversight. I will re-ask my questions.
- Did the analysis of the canister drop assume a flat contact on the bottom or did you assume that it probably would strike one corner a bit more than other?

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- I suggest turning the tables so the speakers somewhat face the camera in the future.
- where was the equipment if it was available
- What were the results of drug/medical tests of the operators involved with incident on August 3, 2018?
- What is the expected timeline for NRC's enforcement decision on each of the apparent violations?
- Can the current speaker speak more clearly into the microphone? He is very hard to hear or understand.
- The audio is so choppy thatthe meaning is unintelligible. Would the speakers speak into their microphones. please.
- The speaker, from San Onofre, is understandable. The NRC speakers are not understandable.
- Can you ask the speakers to speak directly into their mics, and to put them directly in front of their mouths.
- seems strange that the gussets on the guide ring are only on the top side. as per fotos, it seems that there are no gussets on the underside to assist in centering the canister when uploading. ???
- The community has MANY questions and concerns regarding the Holtec system, which procedures and management oversight cannot correct. What is the best way to have these questions answered.
- 2 months after the Nov 7th NRC webcast, the public received 28 pages of public questions from the chatroom which were not answered. How can we proceed with addressing these concerns? We request a technical expert, not a public relations person. Thank you

- Is this fact correct? No welded canister of fuel has ever been opened (currently over 2,000 are loaded) and no fuel transfer facility exists in the U.S. to unload a canister.
- In the NRC hearing happening concurrent with this NRC hearing, Holtec stated they have no plan for a fuel transfer facility. When will the NRC consider that a necessity? This relatively new system design for spent fuel storage has many long term challenges that could become immediate concerns. WE ARE VERY CONCERNED.
- In the 2014 CEP meeting where Kris Singh presented his sales pitch for the Holtec system to the community , he stated that lifting a loaded canister out of the ISFSI would be as easy as picking up a brief case, and could happen within 4 hours - to inspect canisters. Why not require Edison or Holtec to inspect these gouged canisters? (because they cant, we know....) Assurances from Edison and NRC that there are no significant gouges or scrapes seems about as disingenious as the recent statements from both entities that, "there is no (as in zero) possibility of a radiological catastrophe at SONGS that would affect anything outside the fences of the plant". Really? zero?? Lets not forget what is inside these 50 ton cans.
- Why isnt Holtec present? Why does Edison opt to take responsibility for this defective system? Holtec was subcontracted to do the loading of their Holtec canisters into their Holtec ISFSI. Holtec should be held accountable. Infact, this Holtec system should be recalled.
- sound quality is still terrible, btw
- some ppl are not able to access this avenue for asking questions, i found out during break
- Where are the technical studies to confirm SCE Doug Bauder's wild claim that that there is no danger of a radiological release or fuel criticality if a 54 ton loaded canister dropped 18'.
- Is there a transfer/transport cask on site if a canister breached happened? (that is what Palmisano has stated their contingency plan is)
- look! no gussets for the upload
- unintellible sound
- sure would like the transcript of this meeting to be published in time for public to review BEFORE final action
- Will ANSWERS be posted with the questions?
- When will this webinar and transcript be posted?
- technical challenges with webinar? the nuke waste storage is a new thing too..... Duly noted!!
- Can the public challenge the enforcement action?
- How can we obtain the Holtec Root Cause evaluation?
- We have been provided with no materials that contained an evaluation of scratches.
- For the drop analysis, was a crack in the welding considered as a result of the force of the drop?
- I have submitted 3 questions.
- **[REDACTED]**
- Citizens' Environmental Coalition

- If the canisters can safely drop 25', then why not just drop the rest of the canisters in the silos with your officers and directors on site to celebrate your safety program?
- Why is SCE's safety program not a wreckless disregard for public safety?
- Will the NRC turn their findings over to the U.S. Attorney General for criminal prosecution?
- Why has the NRC allowed the creation of the largest private high level nuclear waste dump on a military installation in violation of the Laws of Armed Conflict?
- Why did the NRC authorize this waste dump on a military installation without specific Congressional authorization? Public Law 88-82 from July 30, 1963 did not authorize the Navy to grant a lease for a nuclear waste dump, so why has the NRC exceeded it's authority by granting such a nuclear waste dump in the middle of 8.5 million people?
- Why not just paint markings on the cable slings to indicate how much the cable has lowered into the silo?
- Why is this dump not hardened against enemy attack since you put it on a military installation? Why are you using the same canisters that are used on non military targets?
- Are these the same guys who told Congress that tobacco is safe and non addictive?
- When will this nuclear waste be removed from San Onofre?
- Is the NRC comfortable with the intermediate/long term storage of high level nuclear waste on a military installation within 50 miles of 8.5 million people?
- Has there been any consideration to using thick walled and easily shipped canisters for the remainder of the waste at San Onofre?
- Would the NRC support the Governor of California declaring a public safety emergency and requiring the temporary removal of this waste to a safer and less populated location in eastern California?
- How are "people and the environment" protected by the nuclear waste dump at S.O.N.G.S.?
- When will the NRC admit it made a mistake when it authorized the nuclear waste dump at S.O.N.G.S.?
- How many more years are we going to have to wait for the NRC to liscense a permanent national repository for nuclear waste?
- Will the NRC or SCE move it's headquarters to S.O.N.G.S. to convince the public that the waste dump is "safe"?
- How are you factoring in the likelihood of human error or gross negligence in your calculations of safety?
- If the canisters can be dropped "safely" at 25' does that mean they will rupture at 26'?
- What damage will happen to the concrete and ventilazation system within the silo with an 18' canister drop?
- How many SCE or contractor employees have been fired or reprimanded due to these safety issues?
- Should there be a disaster at SONGS who would be liable for the devastation? SoCal Edison, Holtec? Camp Pendleton or the military (ie federal government?) , NRC (individual membes of NRC?)

- Are there plans in the works to move the nuclear waste to a site that is not in such close proximty to the ocean?