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A California Interim Solution Exclusively for California Stranded Nuclear Spent Fuel

Additional submitted attachment is included below.

A CALIFORNIA INTERIM SOLUTION EXCLUSIVELY FOR CALIFORNIA STRANDED NUCLEAR SPENT FUEL

A California Interim ISFIS site must be designated in rapid speed.

Camp Pendleton is the wrong military base to store San Onofre spent nuclear fuel for the 160 years or indefinitely as now regulated by the NRC. Perhaps we can press the DOD for a California military base swap in an isolated location away from the obvious dangers at San Onofre.

The California coast must no longer be the location to create nuclear energy or store nuclear waste. California is geographically located on the earth's earthquake zone called the ring of Fire. Until Fukushima perhaps we were dreaming we were safe with nuclear reactors on our California coast. The NRC keeps trying to prove to us that we are no different from a reactor located in Nebraska with the NRC generic waste rules and their approval of SCE's environmental impact report saying San Onofre has no special geographic concerns above "small." The CEC must demand today's knowledge of risks be applied. Seismologists in California have better science today and are warning us clearly in messages to the public never expected in the 1960's when nuclear reactors were built along the coast of California that we can expect an 8.0 soon and underground triggers are not predictable. They equate the potential harm to a recent devastation in Turkey and to the San Francisco quake in 1905 that took four decades to recover financially. No one recovers from a nuclear industry miscalculation of risk models. Nuclear accident is forever.

The California Interim site selected must also be away from the ocean environment due to the unknowns of future storms, potential tsunamis, for protection of the ocean environment and to prevent the corrosive effects of salt water on the ISFIS concrete and stainless steel canisters. San Onofre has 50 Areva canisters already 10 years in above ground cement overpack and the cement has needed patching. And no inspection of the cement inside the canisters or the canisters themselves is planned by the NRC even when relicensing takes place in 2023.

The site selected must not be at the bottom of a hillside where rain deluge runoff could well-up under the ISFIS or flood the control areas such as has happened at San Onofre.

The site selected must not be where firestorms that burn acres of land out of control could be a danger to employees and defense in depth safety measures affecting the spent nuclear fuel in storage such as happened at San Onofre recently where employees had to be evacuated.

The site selected must have a no fly zone and distance from highways, and ocean access to be insured against a terrorist attack. The record is clear from the SCE CEP meeting April 16, 2015 if a terrorist with today's weapons of destruction decided to launch an attack on even dry storage to blow it up, we have no defense at San Onofre against it, only the probability that no one will decide it is a good target.

The site must be away from 8.4 million people who would have to leave their homes if another design basis mistake is made by the nuclear industry and the NRC. The nuclear industry is limited in lawsuits to \$11 billion and is an industry that functions on profit and probability models. Over ninety percent of the

NRC salaries are paid by the nuclear industry. Commissioners who challenge the nuclear industry do not stay long as commissioners.

The site must be away from the possibility of aquifer contamination. The dry canisters are a 25 year experiment that may last 100 years or may corrosion crack within decades making transport impossible.

The site should be in California in order to streamline stakeholders' consent and the laws that would be needed and not cross state borders where more stakeholders and different laws could stop the progress of a site selection for California stranded spent fuel.

All plans for a California Interim spent fuel ISFSI must adhere to California environmental laws even if private land is purchased or a reservation exempt from state and federal laws is contracted.

Consent based contracts must be written including laws that prevent the use of eminent domain procedures because they will be held up in court for decades as is currently the case with Yucca Mountain and Utah's private fuel storage facility that is on reservation land. We must also remember Nevada did not want the country's spent fuel. We must make sure California in solving our interim storage problem does not become the waste storage for the entire country.

A law must be written to insure that no nuclear spent fuel from out of state may be imported to an Interim ISFSI built in California. And the storage facility is not for reactor fuel from Diablo until it is shut down as the continued transport of the fuel must not be a part of the Interim process for decades to come.

Any Interim ISFSI land must be held by the public for 160 years in the contract since the NRC regulations for long term storage at a closed reactor is by NRC regulation allowed until the DOE has a final deposit solution. And any private energy company bidding to create a California ISFSI must not have profits based upon a short range contract. One hundred sixty years is the expected length of stay of the fuel at this time by the NRC. The taxpayer needs guarantees that the land, the structures, monitoring personnel, the emergency dry transfer systems are a part of the company's 160 year plan and that replacement of aging or damaged canisters is included. Protection of the area cannot be the current NRC standard of 5 terrorist on the ground or even less protection as the NRC is now considering. The public deserves protection for this deadly fuel we must pay for in storage for the next 10,000 years.

The 1976 moratorium on nuclear reactors in California must be strengthened not weakened now that the world has watched misjudgment of the nuclear industry design basis create two dead zones and cause San Onofre to be shut down early for human errors in planning. We have also watched WIPP due to human error on a simple level of tossing materials in the wrong container and not watching the monitoring screens for 15 hours which were on a 24 hour monitoring program cost billions of dollars and shut down forever large areas of the Waste Isolation Pilot Plant due to radioactive contamination not stopped by a monitoring system that was ignored. A hoped reopening in four years of new storage there though announced by the Secretary of Energy March 24, 2015 did not include better standards for oversight which must be better regulated than a profit based industry seems to be capable of producing. The DOD must form a West Point or Annapolis nuclear engineered team like the Navy seals that will be

specialized and dedicated to oversight of long term aging management of the nation's nuclear spent fuel. The nuclear industry has not invented the safeguards it promised. Private or public ISSFSIs must have DOD oversight to protect against deadly errors. When we say this is too expensive we must remember Fukushima is now in the trillions of wasted dollars and still has not started to contain the damage.

Secretary of Energy Ernest Moniz announced in March 24, 2015 that he has budget now for one consent based Interim Storage location for commercial spent fuel and one pilot plan in a yet to be planned solution to the stalemate of what to do with the nation's commercial back end stranded nuclear spent fuel. California has the opportunity to get funding if we design the plan. We must act now.

California needs to invent its Interim solution and apply for the funding. Thirty-three states are going to need 33 different consent based plans as their stranded spent fuel must be addressed. Thirteen states already have stranded fuel and need an Interim solution. It is wrong minded to plan for one or two consolidated interim locations just as it was a mistake to cart 140 tons of nuclear waste across 890 county boundaries to one final repository at Yucca Mountain.

The United States will need three final deposit repositories, one in the West and two in the East if any can ever be consent based and scientifically and technically safe. But that future is decades away and every two years in the nuclear industry, the NRC, and our government, all the leadership changes and no one is accountable and no action is the result.

The billion dollars about to be spent by the taxpayer through a loan from SCE to triple the size of the current ISFSI at San Onofre must be put on hold until a new site is designated and the Interim Storage ISFSI can be built where the fuel may remain for 160 years or indefinitely as it must be watched for tens of thousands of years or until science discovers a new way to use it.

Decommissioning at San Onofre must be stopped in any way California can exert its policies. A new SCE PSDAR with current environmental impacts must be demanded that recognizes the geographic vulnerabilities of San Onofre instead of pretending they don't exist.

The recent contract to Holtec for its experimental canisters with the vertical buried below grade cement ISFSI system must be stopped. It is not licensed currently by the NRC for transport. The February 24, 25, 2015 NRC meeting about concrete degradation at places such as the Idaho National Lab. allowed experts to speak freely about inspecting dry storage in the decades to come. They had many concerns about how to inspect a below grade cement structure such as the one on the bluff 200 feet from the ocean. Would they need to excavate? Would excavation destabilize the system? There was concern about hillside ground water. What was most apparent was that the experts didn't know what to expect with the newly contracted Holtec below grade dry storage system. The CEC must do everything in its power to demand a new SCE approach that focuses upon fuel transfer not below grade burial in canisters not transportable.

The current 50 Areva dry storage canisters could be moved as soon as the already NRC approved transport casks are produced. The casks were in the SCE budget DCE to be ready by 2016 but were

canceled. They must be ordered. The transfer cask and crane now on the east coast must be returned to San Onofre as long as Areva canisters are stranded there.

The DOE has announce a budget and the production of a dedicated train box car that can carry on US train tracks the heavy loads for a canister in a transport cask. That means the 50 Areva canisters now stored in cement overpac for ten years at San Onofre could be moved as soon as the cement above ground ISFSI is built in the remote California location selected for CA Interim storage. The spent nuclear fuel in the cooling pools at San Onofre could conceivably be transported by dedicated truck as it was to Illinois. Or it could be put in dry storage canisters that will fit in the already constructed ISFSI cement overpac as the current Areva canisters are removed two at a time until transport of all is accomplished. It is my understanding that a dedicated train could take two box cars, thus two canisters on US train tracks the 100 to 500 mile distance to whichever remote location is selected. The current plan has canisters still at San Onofre through 2050. That cannot be allowed.

California cannot afford to wait. We must act consciously understanding California's specific dangers and stop pretending the fuel can be left where it is.

I would welcome any way I can help with this process. I have records for the last four years, since Fukushima grabbed my heart and made me look carefully at the dangers at San Onofre.

Best Regards,

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