Docket Optical System - Comment for Docket No. 11-IEP-1J (From a SONGS Licensed Nuclear Reactor Operator)

From: James Chambers <james@vcweb.org>

To: <docket@energy.state.ca.us>

Date: 8/1/2011 10:48 AM

Subject: Comment for Docket No. 11-IEP-1J (From a SONGS Licensed Nuclear Reactor Operator)

CC: <gary@sanclementegreen.org>

Dear California Energy Commission Members,

11-IEP-1J

DOCKET

DATE <u>AUG 01 2011</u>

RECD. AUG 01 2011

I'd like to thank you in advance for taking the time to read this letter. I am an NRC Licensed Nuclear Reactor Operator for SONGS Units 2 & 3, and have worked for Southern California Edison for over 25 years.

I want to focus on just one of many, many, issues that have plagued the plant for a great number of years but this one should significantly affect your opinion of the safety and rationale for the continued operation of the facility. SONGS was issued a letter by the NRC in March of 2010 stating that they had created an environment where the actual workers, the operators of the plant, were afraid to raise safety concerns for fear of retaliation. This means that people are not telling the truth about adverse conditions because they are afraid they will be retaliated against in the form of negative performance appraisals, loss of job mobility, loss of pay raises, loss of annual bonuses, loss of vacation, and loss of advancement opportunities. All of the aforementioned have actually occurred at SONGS! This is a highly documented phenomenon and SONGS received a staggering 59 allegations of wrongdoing in 2010. SONGS has become quite notorious in the nuclear industry for being an egregious outlier in *all the wrong areas* of plant performance and Industrial Safety.

There has been a long and continual decline in performance, morale, commitment, and attitudes since 1998 when SONGS was rated as an INPO 1 plant. SONGS is now an INPO 4 plant and this is the worst rating a nuclear facility can receive. This fact alone should cause you to feel uneasy about the future health and safety of the general public and the great state of

California. Would you feel comfortable eating at a restaurant that had even a "B" rating, let alone a "C", or "D" (if possible)? I feel confident that even a "B" rating at an eatery would cause you great concern, so why is it permissible to allow a nuclear facility to continue to operate with the poorest rating available? SONGS received a whopping 59 allegations of wrongdoing that met the 4 prima facie criteria for allegations. Is it acceptable for the average citizen to continue to operate a motor vehicle with 59 moving violations? I say no, and I say no to a nuclear facility that has the worst rating possible and possibly the largest amount of NRC allegations in U.S. nuclear history.

Please do not be deceived by nuclear politicians who want to assuage your concerns with "trinkets" of performance improvement. If the best performance improvement was realized at SONGS, and conservative hold points were removed by INPO (the rating organization), it would take a full six years to become an INPO 1 again. My point is that performance changes at SONGS are similar to freeway construction; they are very slow to progress, they cost hundreds of millions of dollars, they always exceed their projected completion date and budget, -- but even more importantly—they affect the lives of hundreds of thousands of people (namely those residing in San Clemente, Dana Point, and San Juan Capistrano). You will hear the most heartwarming stories of commitment and change, but these are only designed to obscure your view of reality, and that is a nuclear facility where the workers are *cowering in fear of telling the truth!*

I have alot of information concerning the real workings of SONGS, the real depths of worker morale and subsequent lack of concern, but I would like to end with one simple fact. A very senior SCE employee and coworker told me that he could not be a witness to my safety concerns and the subsequent investigations that would eventually follow, because he needed to retire and then be immediately rehired as a contractor for financial reasons.

I submit to you today that a governing body other than the NRC or the utility needs to intervene and immediately order the shutdown of SONGS Units 2 and 3 to protect the health and safety of the public. The barriers to prevent

a catastrophic nuclear event are compromised and cannot be reestablished with the current managers of the facility.

Once again, thank you for your time.

James F. Chambers

Hired as a temporary worker at SONGS in October, 1983 as a fire watch. Became an SCE employee in July, 1985, as an Apprentice Nuclear Plant Equipment Operator.

Licensed by the NRC in February, 1993 to operate SONGS 2/3 Reactors. Experienced in training instruction to operate the facility, performance improvement,

human performance, self-assessment of divisions, emergency planning, and facility license.