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Filer:	Raquel Kravitz
Organization:	Donna Gilmore
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From: Donna Gilmore [mailto:dgilmore@cox.net]
Sent: Thursday, April 16, 2015 3:37 PM
To: Barker, Kevin@Energy
Subject: Nuclear Workshop request and comments -- 2015 Integrated Energy Policy Report (2015 IEPR)

There is no representation from the public in the locally affected area on the nuclear workshop panel. David Victor was appointed by Edison to Chair the Community Engagement Panel (CEP). He does not represent the local community. His dry cask storage paper, which I have linked below, is filled with opinions and unsubstantiated hope of future solutions, so you have inadvertently stacked the deck on this workshop with two Edison supporters of unproven, experimental Holtec technology. The Holtec system Edison plans to use has never been used anywhere in the world. We're facing another nuclear experiment, similar to the steam generator failure.

I was invited by David Victor to provide input to his dry cask paper. Any facts that didn't fit Edison's agenda were ignored or discounted with no basis in fact. He did the same to others who provided input to his paper.
http://www.songscommunity.com/docs/LongTermStorageofSpentFuel_120914.pdf

The following document is my counter to his paper and to Edison's "Fact Sheet" on the Holtec system.
https://sanonofresafety.files.wordpress.com/2011/11/reasonstobuythickcasks2015-01-30.pdf

A Diablo Canyon thin 1/2" thick stainless steel Holtec spent fuel storage canister was found to have conditions for cracking after only two years of service. David Victor ignored this in his report.
https://sanonofresafety.files.wordpress.com/2011/11/diablocanyonscc-2014-10-23.pdf

The NRC said once cracks initiate, a through-wall crack can occur in as little as 16 years (page 4 of 8/5/2014 NRC meeting summary). David Victor also ignored this. The NRC in this same document thought cracking would not initiate for at least 30 years. However, this was before they knew about the Diablo Canyon having a canister that has all the conditions for cracking in a 2-year old canister.
http://pbadupws.nrc.gov/docs/ML1425/ML14258A081.pdf

The President of Holtec, Dr. Singh, vendor of the Holtec thin steel canisters, stated at the October 14, 2015 CEP meeting that it's not practical to repair a canister if it's damaged:

*"...**It is not practical to repair a canister if it were damaged**... if that canister were to develop a leak, let's be realistic; you have to find it, that crack, where it might be, and then find the means to repair it. **You will have, in the face of millions of curies of radioactivity coming out of canister**; we think it's not a path forward...*

*...**A canister that develops a microscopic crack (all it takes is a microscopic crack to get the release)**, to precisely locate it... And then if you try to repair it*

*(remotely by welding)...**the problem with that is you create a rough surface which becomes a new creation site for corrosion down the road**. ASME Sec 3. Class 1 has some very significant requirements for making repairs of Class 1 structures like the canisters, so I, **as a pragmatic technical solution, I don't advocate repairing the canister**."*
Here is the video of his statements https://www.youtube.com/watch?v=euaFZt0YPi4

I previously submitted recommended to the CEC and they still stand:
The CEC needs to add to their nuclear policy that canisters must be inspectable, maintainable, repairable and not subject to premature degradation. The monitoring system should provide an early enough warning to mitigate failure of the canister. The Holtec canister system Edison has selected for San Onofre, the Holtec UMAX underground system, does not meet these requirements.

A plan should also be required to replace failed canisters. Edison plans to eliminate the spent fuel pools when empty. This is the only current method to replace failed canisters.

I request to be part of this nuclear workshop panel, so I can address these issues in person. I was planning to fly up to Sacramento, but if I'm allowed only a 3 minute comment period that will not be sufficient to address what will be misinformation to the CEC and the public, so does not appear to be worth my time and expense.

The NRC invited me to speak at their November 2014 Annual Nuclear Waste Conference because of the knowledge I have obtained about this technology. Here is my presentation.
https://youtu.be/KvAbDX0R2Eg

I was also able to ask questions of presenters from the NRC and nuclear industry. From this Question and Answer session with Areva canister vendor, you will see they have no plan for replace failed canisters once the fuel pools are removed.
https://youtu.be/SjvJmE6ZKuM

Here are additional Q&A's that point out more limitations of these thin canister systems.
https://youtu.be/SjvJmE6ZKuM

The NRC may tell you technology exists for inspecting and repairing stainless steel. What they may not volunteer is that none of this currently is usable on canisters filled with nuclear fuel. They will also not share with you the limitations of technology to inspect for cracks in stainless steel.

Below is my pre-hearing conference statement to the CPUC San Onofre Decommissioning proceeding (Application 14-12-007). It makes the case for the areas where the state has jurisdiction and provides NRC technical and scientific sources.
http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M148/K824/148824935.PDF

Commissioner Florio at the 4/2/2015 CPUC pre-hearing conference challenged Edison's contention that the spent fuel storage system was not within the jurisdiction of the CPUC, since premature replacement of the Holtec system could cost ratepayers over an additional $1.3 billion.

Edison would not allow vendors of other dry storage system technology to bid on on the San Onofre dry storage system. This is not acceptable. There are a very small number of vendors in this business and the ones they excluded do not have the problems of the thin canister systems Edison allowed to bid. The thick cask system are the leading technology internationally. California needs to have all these options considered and evaluated in a cost benefit analysis and that addresses the length of time we require these systems to last.

The NRC has not approved the Holtec UMAX system for San Onofre and other high seismic areas. They approved the system for other sites for 20 years and, shockingly, said considering any aging affects or other degradation that may occur after 20 years was out of scope of their approval. I had submitted comments to the NRC last September. Based on these comments they pulled the UMAX from approval. When they reissued the approval, effective 4/6/2015, they addressed my comments by saying the issues raised didn't apply to the first 20 years, so they didn't consider them.
http://www.gpo.gov/fdsys/pkg/FR-2015-03-06/html/2015-05238.htm

Thanks for your consideration,

Donna Gilmore
SanOnofreSafety.org
949-204-7794