



ALLIANCE FOR NUCLEAR RESPONSIBILITY

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April 9, 2012

Gregory Jaczko, Chairman
US Nuclear Regulatory Commission
Rockville MD

Dear Chairman Jaczko

Thank you so much for meeting with the Alliance for Nuclear Responsibility after your marathon SONGS meetings a last Friday. I had sent a list of topics to Angela before the meeting and hope this was somewhat helpful.

To review our conversation and clarify our understanding of anticipated response and/or follow up, I'd like to summarize issues where less than stellar oversight is perceived and/or feared:

Seismic studies – while the NRC assures California that SONGS is seismically “safe,” ratepayers are facing \$64 million *at each* aging reactor site for updated studies and this does not include the resolution of the NRC’ Fukushima seismic lessons learned. As we mentioned in March 2010, when the NRC failed to require and/or independently oversee utility seismic studies the result was billions in cost overruns. We realize this monetary concern is not the NRC’s mandate, but your decisions impact California’s wallets.

A4NR’s request: The NRC should not lift the “52 month” hold for Diablo Canyon, nor should it accept a license renewal application for SONGS until all seismic studies (state and federal) are completed and independently reviewed.

Emergency planning – during the Fukushima disaster the NRC called for a 50 mile evacuation zone for U.S. citizens, yet it appeared the NRC is at least a decade away from updated emergency policies here at home. You and your staff had the opportunity to drive—or be “stuck”—on San Onofre’s evacuation route and candidly admitted that sometimes the best answer is “sheltering in place.” And yet, which member of the California public do you expect to stay home after a Fukushima style emergency?

A4NR’s request: The NRC should expedite post-Fukushima emergency planning updates nationwide, beginning with the reactors on the Eastside of the Pacific Rim.

Price Anderson liability limits: Current liability limits are approximately \$12.6 billion, which in light of damages resulting from Fukushima is, by anyone's standards, woefully inadequate.

A4NR's request: The NRC should write a letter to the Administration and Congress requesting these limits be updated to reflect the reality of populations and property values, tourism and agriculture loss, within 50 miles of SONGS and Diablo Canyon.

Water impacts: It has yet to be determined what, if any, new seismic requirements will apply to the once-through-cooling systems at both California reactors, and their potential replacements if the state maintains its commitment to upholding the Clean Water Act.

A4NR's request – the NRC should clearly inform the California's State Water Board that updated seismic studies based upon post-Fukushima NRC requirements will not be completed by licensees until several years after the state's Board is set to rule on alternatives to cooling at California sites.

Storage of radioactive waste: the recent NRC proposal to leave waste at reactor sites for 250 or more years, is irresponsible in light of the increasing knowledge of seismic and erosion vulnerabilities on the Eastside of the Pacific Rim. Decades of broken federal promises to create a safe and permanent site to store this deadly material transformed ongoing custodianship of the waste into a state problem. The NRC would never license a permanent radioactive waste facility on California's coast, but by claiming 250 or more years is "temporary" the NRC shortsightedly increases our risks, especially in light of the absence of private insurance and adequate federal coverage.

A4NR's request – disallow license renewal applications for Diablo and SONGS until a permanent repository is in place and operating.

Defective Steam Generators – The NRC assured California that the new SONGS steam generators were safe to operate and the CPUC provided ratepayer funding for this project in part based on the NRC's approval. Yet the steam generators are not reliable and the cost assignment will be controversial. As evidenced by the media on Good Friday, the world is going to be watching the NRC's decision to allow resumed operation – at any power level.

A4NR's request – the NRC should not allow any political pressure asserting the need to meet state grid reliability to influence resumption of SONGS operation absent 100% assurance that SONGS Unit 2 & 3 will never exhibit any of the current vibration/corrosion/degradation problems during the remaining ten years of its current operating license.

Again we thank you for your time and for speaking out on behalf of demanding greater safety from the nuclear industry. We appreciate your listening to the concerns that affect the NRC's reputation as they impact both the ratepayer's pockets and the reliability of our generation sources.

In Peace,

Rochelle Becker
Executive Director