

March 20, 2013

Via Email

Commissioner William D. Magwood, IV  
United States Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Dear Commissioner Magwood:

I received a copy of your extraordinary “Who Are We” speech yesterday, and read it in a reflective mood as I tried to absorb my ejection earlier that morning from the SSHAC Level 3 workshop on Ground Motion Characterization sponsored by Pacific Gas and Electric Company, Southern California Edison, and Arizona Public Service.

I represent the Alliance for Nuclear Responsibility in California regulatory proceedings. Two of my colleagues – Dr. Douglas Hamilton and David Weisman – and I were told to leave the Ground Motion workshop before it started. Based on our prior attendance at PG&E’s SSHAC Level 3 Seismic Source Characterization workshops, we mistakenly believed this would be a public session.

As you are no doubt aware, the NRC’s guidelines for the conduct of SSHAC Level 3 workshops are explicit on this question: “interested parties can view interactions at workshops” (NUREG-2117, Table 4-2, p. 56). We have found our attendance at PG&E’s earlier SSHAC workshops to be an invaluable education – indeed, Dr. Hamilton was a formal presenter in PG&E’s source characterization process. Yesterday, when I asked PG&E’s Dr. Norman Abrahamson – the Ground Motion workshop’s Technical Integrator – why we were required to leave, he said that the other utility co-sponsors had insisted that attendance be restricted.

I am aware that Southern California Edison imposed a similar limitation on its SSHAC Level 3 Seismic Source Characterization workshop earlier this year. I find it impossible to reconcile that cloistered attitude with any expectation that such a process will inspire public confidence in the rigor or objectivity of its results. As you put it in your speech,

*“Remember the words penned by Dr. Kurokawa: “our reluctance to question authority; our devotion to ‘sticking with the program’; our groupism; and our insularity.” Read those words and ask yourselves: “Who are we?”*

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*A go-along to get-along mentality can be a side-effect of enduring success in any organization, but for a safety regulator, it is a cancer. It is a subtle disease that can start deep inside the body and spread, not becoming apparent until it is too late.*

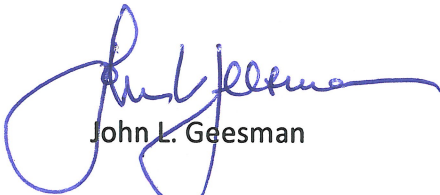
So, Commissioner, I ask you and your colleagues to make this right. Three of your regulatees are in flagrant violation of the NUREG-2117 guidelines for public transparency. You were unmistakably clear in your "Who Are We" remarks:

*Asking "Who are we" means stripping away myth and illusion and taking a hard, cold look at what lay beneath the veneer. But why must we wait for a catastrophe to engage in such critical introspection? This is a missed opportunity; such introspection can be preventative as well as retrospective.*

*Asking that question now can force us to ask if our organizations live up to their claims and reputations. It can force us to ask if we are doing all that we can to live up to the values and principles we promote, to assure we are meeting the standards we set for ourselves. Talk is cheap. Glossy brochures are only a bit more expensive. It is the reality behind the words that matters.*

Are these updated seismic assessments of the California-related plants, ostensibly being conducted under SSHAC Level 3 procedures, truly so fragile they cannot withstand public transparency?

Very best regards,



John L. Geesman

cc: NRC Commissioners