



ALLIANCE FOR NUCLEAR RESPONSIBILITY

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April 15, 2019

Bruce A. Watson,  
Chief, Reactor Decommissioning Branch,  
Division of Decommissioning, Uranium Recovery and Waste Programs,  
Office of Nuclear Material Safety and Safeguards.  
Office of Administration, Mail Stop: TWFN-7-A6OM  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
*via electronic delivery*

RE: Docket NRC-2019-0073-0001

Dear Mr. Watson:

The Alliance for Nuclear Responsibility (A4NR) is a statewide ratepayer advocacy organization (501c3) that has monitored the activities at both the San Onofre and Diablo Canyon nuclear power plants since 2005.

This letter represents an official request to the Nuclear Regulatory Commission that **at least two public meetings** addressing the potential best practices for decommissioning and the establishment and use of a local community advisory boards be held in our state.

One meeting should be located in southern California between Orange and San Diego County, to serve the San Onofre community and represent the interests of ratepayers to both Southern California Edison and San Diego Gas & Electric.

The second should be in San Luis Obispo, to serve the Diablo Canyon community and represent the ratepayers of Pacific Gas & Electric. San Luis Obispo is also a reasonable driving distance from the central valley cities of Fresno and Bakersfield, where many PG&E customers with heavy summer air conditioning and agricultural usage have been paying into the decommissioning trust funds.

California's stake in the successful decommissioning of its two largest plants cannot be underestimated; or rather, failure of the process would have ripples widely felt. As reported by Forbes Magazine in November 2018: "If it were a country, California's \$2.9 trillion economy

would be the fifth biggest in the world, ranked between Germany and the United Kingdom. The state represents 14% of the U.S. economy.” Further, the population of Orange, San Diego, (and portions of Los Angeles County) within 50 miles of San Onofre—in and of itself—is greater than all but one dozen entire states in the nation.

Recent events involving failures in the spent fuel cask loading procedures at San Onofre (and concurrent critique of NRC oversight) have led to very well attended public meetings. The same can be said for Diablo Canyon, where seismic concerns have motivated and produced large turnout for public hearings on similar matters. In addition, both facilities have utility-chosen community decommissioning engagement panels, with questionable criteria for membership and procedures, and this will provide the NRC with multiple examples of how this process has operated and what lessons may be learned.

Thank you for extending the opportunity to comment.

Yours truly

\_\_\_\_\_/s/\_\_\_\_

Rochelle Becker  
Executive Director