

## Wright, Darlene

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**From:** r johnson [r66nj@yahoo.com]  
**Sent:** Wednesday, May 08, 2013 6:54 PM  
**To:** CHAIRMAN Resource  
**Subject:** public comment on San Onofre from local resident

Dear Dr. Macfarlane,

I have admired the skill with which you have guided the NRC in the last few months. But I fear that like the previous chair you might be outvoted by the other commissioners.

Your slow, careful, and concerned approach is appreciated. But we all wonder if it is the same old style of the NRC appearing to be concerned about public safety ("Protecting People and the Environment"). Traditionally the NRC ends up taking the risky alternatives which favor the nuclear industry at the expense of public safety. In order to justify this, the NRC hides behind endless rules and regulations and concludes that if regulations are followed then the plants must be safe.

Living in San Clemente, I am naturally concerned about San Onofre. I note that yesterday the Kewaunee plant decided to close, and it seems logical to me that Edison should close San Onofre for many of the same reasons. This is a good time to decommission since decommissioning costs are rising by 8-9% a year. Older facilities no longer have experts who thoroughly know the history of the plant. The cost of fixing a broken plant like San Onofre might be prohibitive, and Crystal River discovered. Letting broken plants like San Onofre to remain open seems dangerous and irresponsible.

As Edison struggles to fulfill your procedures, let me give just a few examples to illustrate that following NRC procedures does not lead to safety. First, San Onofre is required to have an evacuation plan, which it does. But it is not required to have an evacuation plan that will work. The GAO now says it can't work. If you were really interested in safety, you would close plants in highly populated areas where evacuation is impossible.

Second, Edison is allowed to discharge radioactive waste into the air and ocean as long as it is within "permissible" limits (based on ALARA). It is not required to stay within safe limits. Its atmospheric releases blow right over densely populated areas (the prevailing winds blow inland). The ocean discharges start only 1000 ft out from a very popular swimming and surfing state beach. There are reportedly lots of surfers with cancer. The marine life has been devastated in spite of mitigation efforts. In 2011 Edison made 215 ocean discharges averaging 2.4 hours each totaling 517.9 hours. Including the atmospheric releases they discharged 1,400 Ci into a densely populated area. (<http://pbadupws.nrc.gov/docs/ML1211/ML12118A098.pdf>)

Third, you can say that Edison followed your procedures when replacing the steam generators. But the procedures didn't work and are full of loop holes which favor the industry. Your procedures allowed them to make major and unsafe modifications and they were able to do it in such a way as to bypass thorough and public oversight.

Fourth, San Onofre sits on an active fault, something that the NRA in Japan says they will not allow. Why is something judged unsafe in Japan judged safe in the U.S.? In all the NRC public hearings over San Onofre, the NRC and Edison have carefully avoided any safety considerations related to seismology. Being a geologist, you must be sensitive to this issue. Why does no one else at the NRC care? You should close all plants sitting on active faults.

Fifth, the NRC has completely ignored terrorist threats, a major safety concern for San Onofre. A few weeks ago North Korea displayed target maps for its new long range missiles and southern California is one of the main targets. They don't even need a nuclear missile because thousands of tons of highly radioactive waste are stored right here. Nuclear weapons designer Ted Taylor once said that it is easy to turn a nuclear power plant into a nuclear weapon. The Sandia National Labs has stated that even a medium sized conventional explosive outside the perimeter could disable vital

reactor systems and possibly lead to a meltdown. The waste stored here 500 feet from an interstate highway has the radioactive equivalent of 1000 Hiroshima bombs. No one is connecting the dots: the San Onofre domes are the twin towers of the West Coast.

So where is all the concern for safety? You have a long list of legitimate safety issues which are not being addressed. It is not just Edison's San Onofre which is being judged: it is the NRC which is being judged. Is this a legitimate regulatory agency protecting the public or is it an agency dedicated to protecting the nuclear industry? Shutting San Onofre would demonstrate that the NRC is doing its job. Permitting it to remain open would be proof that it is failing the public.

Sincerely,

Roger Johnson, PhD  
Professor Emeritus  
San Clemente, CA  
May 8, 2013