



Office of Mayor and City Councilmembers

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Tim Brown, *Mayor*
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Lori Donchak, *Councilmember*
Steve Swartz, *Councilmember*

James Makshanoff, *City Manager*

September 5, 2018

William Maier, Regional State Liaison Officer
United States Nuclear Regulatory Commission, Region IV
1600 E. Lamar Blvd
Arlington, TX 76011-4511

RE: San Onofre Nuclear Generating Station (SONGS) – Improper Loading of Spent Fuel Storage Canister on August 3, 2018

Dear Mr. Maier:

I'm writing to you on behalf of the San Clemente City Council to express our concerns about the subject incident and to request follow up actions. On Friday, August 3, a SONGS contractor (Holtec) was transporting nuclear spent fuel assemblies from spent fuel pools in an enclosed canister to their new Independent Spent Fuel Storage Installation (ISFSI) structure. Upon loading the 50 ton canister into its storage space the canister became lodged upon guide rings, which resulted in the canister no longer being fully supported by the rigging system and a possible 18-foot vertical drop of the canister. The City is deeply concerned about how and why this incident occurred, which raises important questions that we request NRC to address, including:

1. What is the procedure for this activity? Was it followed correctly or does it need further improvement to prevent a repeat occurrence?
2. What are the experience and training requirements for personnel involved with this activity, and were the personnel involved with this incident appropriately experienced and qualified to perform this activity? Also, is Holtec and any other SONGS contractors properly staffed to conduct these spent fuel storage operations?
3. What are the consequences of a dropped canister? What threats or dangers would be posed to on-site personnel and nearby communities should stored fuel assemblies be compromised?
4. What are the plans for notifying emergency responders and nearby agencies such as the City of San Clemente and County of Orange? The City of San Clemente was not notified of this incident until a SONGS employee mentioned it at the August 9, 2018 Community Engagement Panel meeting.
5. What is the plan for responding to this type of incident? We are concerned by the apparent lack of response or concern by SONGS or its contractors about this incident.

Transfer and storage of spent nuclear waste must be conducted in a very deliberate manner to minimize the risk to on-site personal and the public, and there should be a contingency plan that identifies specific actions that will be taken in the event of a future similar incident. The

City of San Clemente respectfully requests that the NRC address the important issues and concerns the City has raised, and inform the City on NRC's next steps that would help prevent another similar accident from occurring, to ensure proper and timely notification and response, as well as the issue of having public access to real-time monitoring activities. The City looks forward to NRC's responses to our concerns, and I and/or other representatives from San Clemente will attend the September 10 meeting on this issue.

We are also hopeful your response will address the fact that San Clemente is being made, without consent, to effectively host a nuclear waste storage site on our coastline, adjacent to city residential and recreational zones. As a city that has not given consent to be a nuclear waste host, we expect funding to be made available to assist with any and all additional costs associated with preparedness and the planning the city must undertake to keep our citizens and visitors safe.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Swartz', with a stylized, flowing script.

Steve Swartz
Councilmember

cc: Kamala Harris, U.S. Senator
Dianne Feinstein, U.S. Senator
Kevin de Leon, California senate President Pro Tem
Darrell Issa, U.S. Representative, 49th District
Mike Levin, Congressional Candidate, 49th District
Diane Harkey, Congressional Candidate, 49th District
Kriss Kennedy, NRC Regional Administrator
Victor Dicks, NRC Public Affairs Officer