

From: [Liu, Tilda](#)
To: [Charles Langley](#)
Subject: Petition Review Board's Initial Assessment of Public Watchdogs" 2.206 Petition Request dated 10/13/2020
Date: Tuesday, January 12, 2021 3:01:00 PM

Mr. Langley,

Regarding the 2.206 petition request that you submitted by letter dated October 13, 2020, on behalf of Public Watchdogs, the Petition Review Board (PRB) has completed its initial assessment in accordance with NRC Management Directive (MD) 8.11, "Review Process for 10 CFR 2.206 Petitions."

Your petition requested that the NRC take enforcement action in the form of Demands for Information to Southern California Edison (SCE), Holtec, and all other licensees, using the Holtec HI-STORM UMAX storage system, whose licensing documents (Final Safety Analysis Reports and/or Safety Evaluation Reports) claim that there are no credible events that could result in the release of radioactive materials from the UMAX storage system. In addition, your petition request stated that the NRC must require SCE and its subcontractors to respond with information and objective analyses which validate this claim to demonstrate that confinement of radioactive material under normal, off-normal, and credible accident scenarios be reasonably maintained, for a specific list of events.

The PRB's initial assessment is that your petition request does not meet the following MD 8.11 Section III.C.1(b)(i) criterion for petition evaluation:

The issues raised by the petitioner have not previously been the subject of a facility-specific or generic NRC staff review;

Specifically, the concerns expressed in this petition have previously been evaluated or considered in NRC staff licensing reviews and in the evaluation of prior 2.206 petition requests submitted by Public Watchdogs.

Consistent with NRC MD 8.11 Section III.F, we extend you an opportunity to clarify or supplement the petition in a public meeting with the PRB. If you decide to take advantage of this opportunity, the meeting with the PRB may be conducted via telephone or remotely online. Please reply by January 19, 2021, whether you would like to meet with the PRB. If you do, and your schedule permits, we offer a time between the period of February 8, to February 16, 2021, for this meeting. Note that the NRC staff is not available on February 15, 2021, as it is a Federal holiday.

Thank you,
Tilda Liu

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