

# Previous Questions sent to the PRB

1. According to MD8.11, a rejection letter will state “Reasons for the staff’s action will be documented in the closure or acknowledgment letter.”
2. What is the process for appealing the proposed rejection of the acceptance of a petition? Specifically, how long does the petitioner have to appeal the rejection of the petition?
3. The NRC and Holtec both state that loss of integrity of the fuel canister is “not credible.”
  - a. For what time period?
  - b. For terrorism?
  - c. Transportation?
  - d. Corrosion?
  - e. Prolonged long-term loss of cooling?
4. What are the radiological consequences of loss of integrity for each issue outlined in question three (a through e)?
5. Can you provide analysis and/or supporting information proving that a loss of fuel canister integrity is “not credible” for items a through e above? .
6. Why does the NRC require the continuation for off-site liability insurance (Price Anderson) if loss of integrity is not credible?
7. Should an event such as flooding and cooling blockage occur at the San Onofre ISFSI, how long will canister integrity be maintained?
8. The current license basis maximum flood level at the SONGs and ISFSI are unknown and proprietary. Why is flood level proprietary?
9. On August 26, 2013, Edison stated under penalty of perjury, that the ISFSI may be submerged during a tropical storm or tsunami resulting in potential rupture of all 72 spent fuel storage casks. This event is likely to result in rupture of multiple casks and the release of millions of curies of long-lived radioactive isotopes.
  - a. Please explain this inconsistency

- b.
10. What is the lowest level of the canisters on the ISFSI pad vs maximum flood level?
11. Did SCE ever complete the post-Fukushima integrated, site-specific flood analysis?
12. What did the results of the SONGs post-Fukushima preliminary flood analysis show for the maximum flood level?
13. MD 8.11 states: *“If the staff plans to take an action that is contrary to an immediate action requested in the petition before issuing either the closure letter or acknowledgment letter, the petition manager should informally notify the petitioner promptly by telephone and/or e-mail of the pending staff action. Reasons for the staff’s action will be documented in the closure or acknowledgment letter.”*
- a. Why has the NRC staff failed to provide this information?
14. Over the past 7 years, how many 2.206 petitions have been rejected from consideration by the Nuclear Regulatory Commission?