



Public Watchdogs

- Charles Langley
- Executive Director of Public Watchdogs
- 25 years as a Public Advocate regulating California Investor Owned Utilities

NRC determined that a canister breach is
“not credible”



“not credible” = “impossible”

Our Requests

- Define the term “not-credible”
(“not-credible” is undefined in 10 CFR 50 or 72).

What is the specific risk for ...

- Loss of cooling to a Holtec MPC canister at SONGS.
- Risk of Flooding
- Risk of Corrosion
- Risk of Fuel cladding failures
- Risk of Excessive pressure
- Risk of Criticality
- Thermal Transients
- Terrorism

Risk Management Process is standardized



Standard Process

Step 1: IDENTIFY THE RISK

Step 2: MEASURE THE RISKS

Our request:

Provide Proof



How high is the risk?



High Risk!

How *Risky*?

- **SONGS FAILED DUE TO RADIATION LEAK:** NRC grants Edison massive 'Emergency Planning Exemptions
- **BURIAL OF WASTE:** Weeks before the canister burials began, NRC also granted 'On-site' and 'Off-Site' Insurance exemptions
- **RADIATION INSURANCE NOT AVAILABLE:** Not a single private insurer will offer civilian homeowners or renters protection against a nuclear disaster.

NRC STAMP OF APPROVAL



Richard H. Perkins, P.E.
Division of Risk Analysis
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission

September 14, 2012

Hubert T. Bell
Office of the Inspector General
U.S. Nuclear Regulatory Commission, MS 05-E13
11555 Rockville Pike
Rockville MD 20852

Dear Mr. Bell,

Subject: Concealment of Significant Nuclear Safety Information by the U.S. Nuclear Regulatory Commission

I allege that the Nuclear Regulatory Commission (NRC) has intentionally mischaracterized relevant and noteworthy safety information as sensitive, security information in an effort to conceal the information from the public. This action occurred in anticipation of, in preparation for, and as part of the NRC's response to a Freedom of Information Act request for information concerning the *generic issue* investigation on *Flooding of U.S. Nuclear Power Plants Following Upstream Dam Failure*. Specifically requested was the completed screening analysis report for this issue, of which I am the lead author. Portions of the publically released version of this report are redacted citing security sensitivities, however, the redacted information is of a general descriptive nature or is strictly relevant to the safety of U.S. nuclear power plants, plant personnel, and members of the public. The Nuclear Regulatory Commission staff has engaged in an effort to mischaracterize the information as security sensitive in order to justify withholding it from public release using certain exemptions specified in the Freedom of Information Act. Evidence supporting this allegation includes the redacted text from the analysis report, e-mails and written correspondence within the NRC, and e-mail correspondence with other Government agencies. The Nuclear Regulatory Commission staff may be motivated to prevent the disclosure of this safety information to the public because it will embarrass the agency. The redacted information includes discussion of, and excerpts from, NRC official agency records that show the NRC has been in possession of relevant, notable, and derogatory safety information for an extended period but failed to properly act on it. Concurrently, the NRC concealed the information from the public.

Because this concern involves a violation of law and is not related to a technical opinion or distinction, I am not submitting this concern to (or through) the NRC's Differing Professional Opinion Program. It is my intention to cooperate fully with NRC Office of the Inspector General. It is also my intention to make a copy of this letter available to the public shortly after I have submitted it to your office; therefore, please consider this allegation to be public information.

Respectfully submitted,



Richard H. Perkins

Enclosure: Response to Freedom of Information Act / Privacy Act Request, 2012-0106, Final

cc: Rep. Donna Edwards,
8730 Georgia Avenue, Suite 610
Silver Spring, Maryland 20910

History of Ignoring Flood Risks:

NRC Division of **Risk** Analysis

“the NRC has been in possession of relevant, notable, and **derogatory** [Flooding] safety information for an extended period but **failed to properly act** on it ...”

“Concurrently, the NRC **concealed the information** from the public.”

SONGS: a USGS Tsunami Inundation Zone

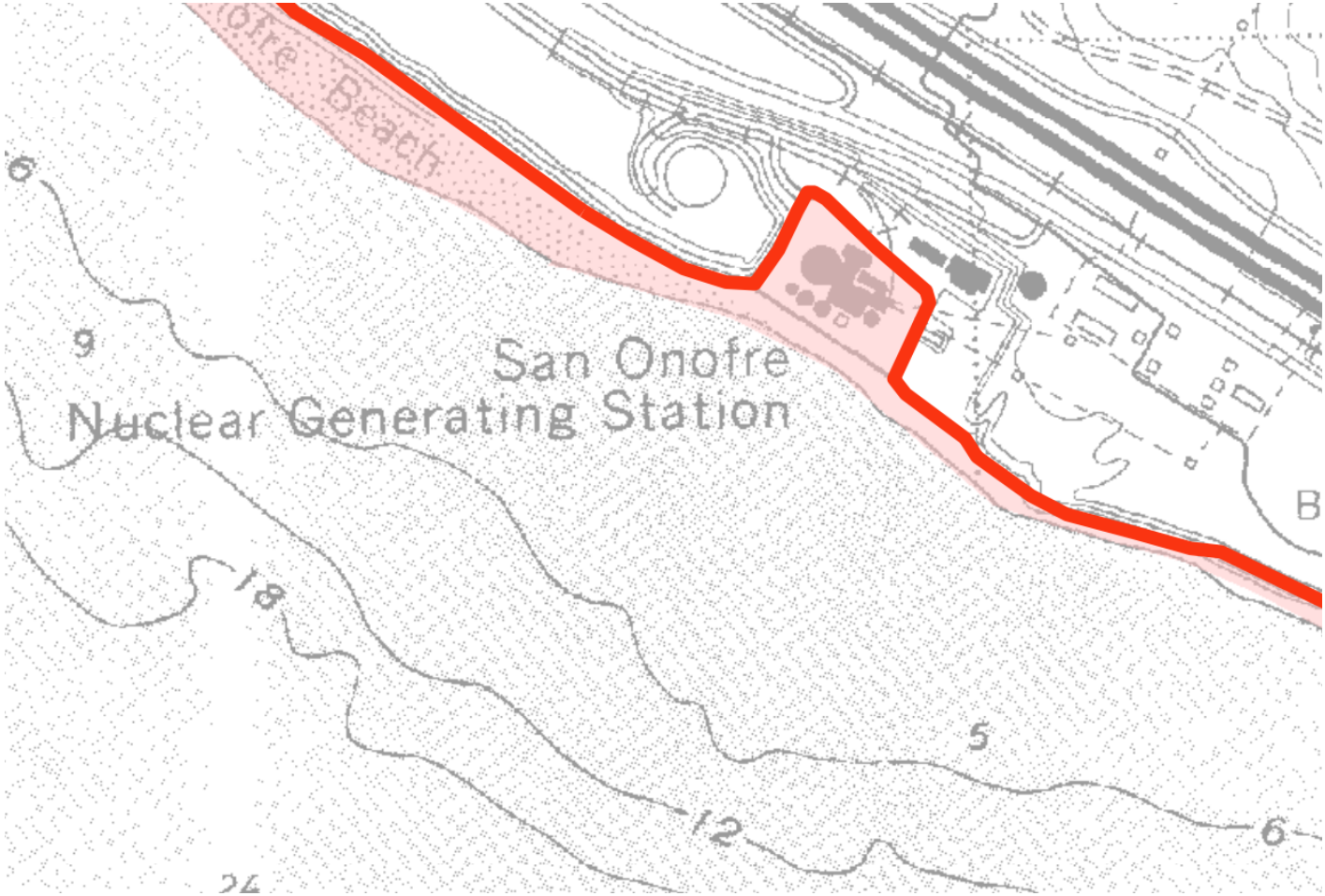
California Emergency Management Agency
California Geological Survey
University of Southern California

Tsunami Inundation Map for Emergency Planning
San Onofre Bluff Quadrangle

State of California
County of San Diego



Close up of of inundation area



“Flooding”



University of Copenhagen new research shows:

Sea-Level rise will increase

“faster than previously thought”
because (the water) in the sea
will expand as it gets warmer”

Source: *Science Daily*

<https://www.sciencedaily.com/releases/2021/02/210202164530.htm>

**SONGS is a “legitimate” military target
under the Rules of War***

SONGS is located on a military base

**Nuclear waste can be used to manufacture
nuclear weapons**

* See Laws of War at https://en.wikipedia.org/wiki/Law_of_war

Thank You

