

From: Suber, Gregory
Sent: Fri, 19 Nov 2021 18:48:33 +0000
To: Shoop, Undine;Wrona, David;Carusone, Caroline;Pham, Bo;Screnci, Diane;Burnell, Scott;Sheehan, Neil
Subject: RE: 10 CFR 2.206 meeting summary

Everyone,

I went through the extracted comments from the transcripts and came away with a few major themes from Blanch:

1. NRC needs to ensure statements in the petition response are not, incomplete, misleading, or inaccurate. (We addressed this through the independence, peer review, and contractor option)
2. A petitioner does not have appeal rights if a petition is rejected. (This is a part if the program we did not change)
3. Petitioners cannot ask the staff questions about the review. They can only present information where as the licensee can ask questions. (This practice is designed not to make the 2.206 process a de facto adjudicatory process. These types of questions should be addressed as a Petition for Hearing, Petition for Rulemaking, or through an Allegation is wrong doing is suspected)
4. General criticism regarding the handling of the San Onofre Petition and the staff's inability to explain how it reaches a determination of what is and is not credible.

This is just a high level read of the comments. In addition, his presentation at the first meeting which was not transcribed, focuses on the methods that can be employed by the public to question regulations and a specific staff analysis. In some cases, the 2.206 process is not the appropriate mechanism to address these types of concerns. Maybe petition for hearing or rulemaking is not in order. Conversely, the Allegations Process or OIG referral works best.

Would like to hear your feedback or perspective.

From: Shoop, Undine <Undine.Shoop@nrc.gov>
Sent: Friday, November 19, 2021 12:14 PM
To: Wrona, David <David.Wrona@nrc.gov>; Carusone, Caroline <caroline.carusone@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>; Burnell, Scott <Scott.Burnell@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>
Subject: FW: 10 CFR 2.206 meeting summary

FYI – Paul Blanch was the individual who made a presentation at the first 2.206 meeting. Attached are his slides

From: [Burnell, Scott](#)
To: [Screnci, Diane](#)
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119
Date: Wednesday, November 17, 2021 8:35:00 AM

That's the focus of the email.

From: Screnci, Diane <Diane.Screnci@nrc.gov>
Sent: Wednesday, November 17, 2021 8:34 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

Just FYI, he also asked Neil for the new public meeting policy (again) recently.

***Diane Screnci** (she/her)
Sr. Public Affairs Officer
USNRC, Region I
610-337-5330*

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Wednesday, November 17, 2021 8:32 AM
To: Russell, Andrea <Andrea.Russell@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>
Cc: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

After checking with the EDO's office, I'll reach out to Blanch on what he wants to discuss. If it aligns with the email he sent the EDO, we'll work on a single reply.

From: Burnell, Scott
Sent: Tuesday, November 16, 2021 9:31 AM
To: Russell, Andrea <Andrea.Russell@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>
Cc: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

Hi Andrea;

He's also emailed the EDO. We're working on how best to wrangle all this into one task, so don't reply just yet. Thanks.

Scott

From: Russell, Andrea <Andrea.Russell@nrc.gov>
Sent: Monday, November 15, 2021 10:05 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>
Cc: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

I just missed another phone call from him. I didn't answer as I'd like some instruction on how to respond to him if I must interact with him.

From: Russell, Andrea
Sent: Monday, November 15, 2021 9:30 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>
Cc: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Subject: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

Good morning,

Both Jonathan and I received the same voicemail from Mr. Blanche Friday afternoon. I have forwarded Jonathan's e-mail below. He wanted to talk about the SECY related to the revisions to the 10 CFR 2.206 process.

I believe all 3 of you were at some point involved in our public meetings regarding the 10 CFR 2.206 process revisions related to the OIG report on Indian Point. Please let me know if you all can address or if Jonathan and I should respond to Mr. Blanche.

Thanks,
Andrea

From: Suber, Gregory <Gregory.Suber@nrc.gov>
Sent: Friday, November 12, 2021 1:39 PM
To: Russell, Andrea <Andrea.Russell@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

So it is a general request. You can call him if you like or refer it to OPA. They are accustomed to dealing with him and can answer any high level question he may have. Just want to be considerate of your time and do not want you to get distracted by a side dialogue.

From: Russell, Andrea <Andrea.Russell@nrc.gov>
Sent: Friday, November 12, 2021 1:12 PM
To: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

Yep...he left same voicemail on mine.

From: Evans, Jonathan <Jonathan.Evans@nrc.gov>
Sent: Friday, November 12, 2021 1:11 PM
To: Russell, Andrea <Andrea.Russell@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Subject: FW: Voice Message From: WIRELESS CALLER, 8609223119

Message from paul blanche

Jonathan E. Evans
Acting Branch Chief
Reactor Inspection Branch
Division of Nuclear Materials Safety
United States Nuclear Regulatory Commission
Arlington, Texas 76011
Phone: 817-200-1249

From: WIRELESS CALLER <tel=8609223119@officelinx.nrc.gov>
Sent: Friday, November 12, 2021 11:23 AM
To: Evans, Jonathan <Jonathan.Evans@nrc.gov>
Subject: Voice Message From: WIRELESS CALLER, 8609223119

From: [Burnell, Scott](#)
To: [Screnci, Diane](#); [McIntyre, Dave](#)
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119
Date: Tuesday, November 16, 2021 9:14:00 AM
Attachments: [20211112 PMB to EDO for public dialog .pdf](#)

Given that he's pinged the EDO asking for another meeting on San Onofre (where he continues to abuse the 2.206 process), I'd suggest letting him know he'll get one response from the agency.

From: Screnci, Diane <Diane.Screnci@nrc.gov>
Sent: Monday, November 15, 2021 10:49 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

If you ask for a list of questions, you're going to get pages of questions. Why don't you just call him back to see what he wants and if it's responses to a list of questions, then ask for the list. (His name is Blanch, by the way. No "e")

***Diane Screnci** (she/her)
Sr. Public Affairs Officer
USNRC, Region I
610-337-5330*

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Monday, November 15, 2021 10:43 AM
To: McIntyre, Dave <David.McIntyre@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

I agree, I was thinking emailing him to ask for a list of Qs.

From: McIntyre, Dave <David.McIntyre@nrc.gov>
Sent: Monday, November 15, 2021 10:42 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>
Subject: RE: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

It's going to be a never-ending monologue

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Monday, November 15, 2021 10:20 AM
To: Screnci, Diane <Diane.Screnci@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>
Subject: FW: 10 CFR 2.206 revisions detailed in SECY (related to OIG Report for Indian Pt): Voice Message From: WIRELESS CALLER, 8609223119

How would you suggest we proceed? Get specific questions from him to pass on to the staff?

From: Russell, Andrea <Andrea.Russell@nrc.gov>
Sent: Monday, November 15, 2021 10:05 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>
Cc: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
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Message from paul blanche

Jonathan E. Evans
Acting Branch Chief
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Phone: 817-200-1249

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Sent: Friday, November 12, 2021 11:23 AM
To: Evans, Jonathan <Jonathan.Evans@nrc.gov>
Subject: Voice Message From: WIRELESS CALLER, 8609223119

Paul M Blanch PE

Energy Consultant

Friday, November 12, 2021

Mr Daniel Dorman
Executive Director for Operations
Nuclear Regulation Commission
Washington DC 20001

SUBJECT: Request for Public Dialog
Communicating with Public Watchdog and the General Public.

REFERENCE: Letter from Kevin Williams to PublicWatchdogs dated August 30, 2021.

Dear Mr. Dorman:

For almost more than two years I, and others have been exchanging communications with the NRC related to our safety issues and the storage of spent fuel at San Onofre Nuclear Generating Station (SONGS).

The most recent communication is from the NRC's Mr. Kevin Williams to Public Watchdogs dated August 30, 2021. Public Watchdogs has formally responded to this letter expressing its total disagreement. We appear to have reached a stalemate.

Our respective opinions related to the safe operation of SONGS are clearly in disagreement. Our strongest belief is that Adequate Protection to the Public is not being provided. The differences of opinions are clearly articulated in numerous letters and meetings between us and the NRC.

We believe that the time has come to consider a different approach to resolve our conflict, seeking resolution with a more open means of communicating. We believe the full Commission is amenable with a different approach as reflected in both the NRC's recently issued policy "Enhancing Participation in NRC Public Meetings," that emphasized the need to improve the consistency of the NRC's public meetings

and help participants better prepare for NRC meetings¹ and its basic Principles of Good Regulation. The NRC espouses principles of good regulation on its “Values” public web page.

“These principles focus us on ensuring safety and security while appropriately balancing the interests of the NRC's stakeholders, including the public and licensees.”

“**Independence:** Nothing but the highest possible standards of ethical performance and professionalism should influence regulation. However, independence does not imply isolation. All available facts and opinions must be sought openly from licensees and other interested members of the public. The many and possibly conflicting public interests involved must be considered. Final decisions must be based on objective, unbiased assessments of all information, and must be documented with reasons explicitly stated.”

Openness: Nuclear regulation is the public's business, and it must be transacted publicly and candidly. The public must be informed about and have the opportunity to participate in the regulatory processes as required by law. [emphasis added] Open channels of communication must be maintained with Congress, other government agencies, licensees, and the public, [emphasis added] as well as with the international nuclear community.”

The recent GAO report on Commercial Spent Fuel² noted that involving the public and restoring public confidence is a key to the resolution of the Commercial Spent Fuel dilemma.

This GAO report encouraged dialog between the NRC and the Public as a means to restore faith and trust in the NRC as a foundation for the resolution of the commercial fuel issue. The GAO report goes so far as to state that “public trust and confidence in the commercial spent nuclear fuel management program” and “The Blue Ribbon Commission’s recommendations focused on ways to sustain the public trust and confidence necessary to see controversial facilities, such as geologic repositories, through to completion.” The GAO noted that “Canada’s Nuclear Waste Management Organization completed a 3-year-long dialogue with the public [emphasis added] to develop a path forward for spent nuclear fuel

¹ <https://www.federalregister.gov/documents/2021/03/19/2021-05787/enhancing-participation-in-nrc-public-meetings>

² <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/viewer.html?pdfurl=https%3A%2F%2Fwww.gao.gov%2Fassets%2Fgao-21-603.pdf&clen=3084930&chunk=true>

management . . .” is the foundation to any resolution of the Spent Fuel issues.”

An open dialog and meeting between the NRC and the Public discussing the public’s safety concerns with SONGS would be a great starting point.

History has clearly demonstrated that conflict is never resolved in an equitable manner without face to face meetings and dialog.

Prior to making a final decision to outright reject our safety concerns, I formally request a public dialog and a meeting with the NRC, in the vicinity of San Onofre and following the guidance the NRC’s Principles of Good Regulation and its Policy of Enhancing Participation.

We suggest that this meeting be conducted prior to the end of the comment period on the Decommissioning Rule such that the outcome of the meeting can be incorporated into our comments on the Decommissioning Rule.

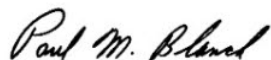
An extract from the NRC’s Policy is provided as Attachment 1 and describes the type of meeting we are seeking.

Please contact Mr. Langley to discuss panel format and participants, meeting location, proposed moderator, time and proposed topics to be discussed.

I am looking forward to your positive response.

Very truly yours,

Sincerely,

A handwritten signature in cursive script that reads "Paul M. Blanch".

Paul Blanch PE

This request has been reviewed by Public Watchdogs and the Samuel Lawrence Foundation and has received their full support and concurrence.

Cc: Chairman Hanson
Commissioner Baran
Commissioner Wright
Inspector General Feitel
Kevin Williams

Attachment 1

Extract from NRC's Policy of Enhancing Participation in NRC Public Meetings

Information Meeting With a Question and Answer Session

Meeting Purpose—The purpose of this type of meeting is for the NRC to share information and discuss applicable regulatory issues and NRC actions with meeting attendees. The meeting will inform the public by providing information to help them understand the applicable regulatory issues and NRC actions through NRC presentations and discussions with NRC staff. These are organized, yet informal opportunities to interact with and ask questions of the NRC staff not associated with a more traditional public meeting format.

Level of Participation—This type of meeting is tailored to inform attendees and allow them to ask questions. The NRC staff should strive to ensure sufficient time is allotted for an Information Meeting with a Question and Answer Session to ensure that members of the public can pose their questions and have them answered during the meeting. Whether all questions are addressed or not, the NRC should emphasize ways members of the public can ask questions outside the meeting.

Description—Meetings in this category are held with interested parties, including representatives of non-government organizations, private citizens, or various businesses or industries, to engage them in a discussion of regulatory issues.

The following description will be included in the notice for an Information Meeting with a Question and Answer Session:

The purpose of this meeting is for the NRC staff to meet directly with individuals to discuss regulatory and technical issues. Attendees will have an opportunity to ask questions of the NRC staff or make comments about the issues discussed throughout the meeting, however the NRC is not actively soliciting comments towards regulatory decisions at this meeting.

From: Sheehan, Neil
Sent: Friday, May 28, 2021 2:17 PM
To: Watson, Bruce; 'Dimitriadis, Anthony'
Subject: FW: Decommissioning and Rubbleization

Bruce/Tony,

You two definitely work in one of the most active in the agency. Can I get your thoughts on this early next week?

Thanks,
Neil

From: Paul Blanch
Sent: Friday, May 28, 2021 12:19 PM
To: Sheehan, Neil <Neil.Sheehan@nrc.gov>
Cc: Paul M. Blanch <pmb Blanch@comcast.net>
Subject: [External_Sender] Decommissioning and Rubbleization

Neil:

I have worked at some decommissioning nuclear plants where “rubbleization”(sp) was employed as a means to “cover up” remaining radioactive material on site after decommissioning. I have searched various sections of 10 CFR and can't locate any discussion of limits, specific or total activity allowed to remain buried and depth requirements.

The only discussion I can find is related to the dose at the surface (25 or 10 mr) of the site. I believe this measurement is a few feet above the ground.

Could you direct me to the location of the NRC regulation that discusses the permitted buried residual activity (not dose) prior to site release by the NRC.

Are the requirements for site disposal similar to those discussed in 10 CFR [PART 61—LICENSING REQUIREMENTS FOR LAND DISPOSAL OF RADIOACTIVE WASTE](#)

If a licensee can't meet the required surface dose rate is it permissible to bury the activity deeper or cover it with more uncontaminated soil?

What regulations are in place to preclude another “Love Canal” type of situation?

Are there any building, farming or other restrictions imposed on the land vacated by Maine or Connecticut Yankee depicted below?



[Sign in to download full-size image](#)

Fig. 4. Maine Yankee Site in 2015 with all plant structures removed, ISFSI remaining (Planet Forward, 2019).



CT Yankee Nuclear Power Plant ...

Paul Blanch
 135 Hyde Rd.
 West Hartford, CT 06117
pmb Blanch@comcast.net
 Cell 860-922-3119

From: [Shoop, Undine](#)
To: [Burnell, Scott](#); [Suber, Gregory](#); [Russell, Andrea](#); [Evans, Jonathan](#); [Carusone, Caroline](#); [Wrona, David](#); [Buckberg, Perry](#); [Pham, Bo](#)
Cc: [Screnci, Diane](#); [McIntyre, Dave](#); [Sheehan, Neil](#)
Subject: FW: ACTION: FOIA NRC-2022-00020 - Fee Estimate Due Nov 23rd
Date: Wednesday, November 17, 2021 9:04:48 AM
Attachments: [FOIA Assignment for NRC-2022-00020.pdf](#)

FYI – from Blanch

From: Kauffman, Lisa <Lisa.Kauffman@nrc.gov>
Sent: Wednesday, November 17, 2021 8:03 AM
To: Shoop, Undine <Undine.Shoop@nrc.gov>
Subject: ACTION: FOIA NRC-2022-00020 - Fee Estimate Due Nov 23rd

Hi Undine,

Would you have summaries or transcripts of the meetings described in this FOIA? Or, can you direct me to who would have them? Right now this FOIA is just in the estimate phase asking for (1) search time, (2) review time, and (3) approx. page count The estimate is due back to me by 11/23.

Let me know if I should send this to someone else.

Thanks,

Lisa Kauffman, FOIA Coordinator
Reactor Program Services Branch II
Division of Resource Management and Administration
Office of Nuclear Reactor Regulation
FOIA CAC: ZF0000

From: Ellis, Stephan <Stephan.Ellis@nrc.gov>
Sent: Wednesday, November 17, 2021 7:36 AM
To: NRR FOIA Resource <NRRFOIA.Resource@nrc.gov>
Cc: Kauffman, Lisa <Lisa.Kauffman@nrc.gov>; Stevens, Margo <Margo.Stevens@nrc.gov>
Subject: RE: NRC-2022-00020 - Fee Estimate Due Nov 23rd

Good morning,

This requester has been placed in the "non-excepted" fee category, being responsible only for search fees in excess of two (2) hours and duplication costs after receiving 100 pages free of charge. Therefore, your initial fee estimate of search fees and duplication costs is required on or before Tuesday November 23, 2021.

- Please note – The Requester is seeking transcripts or summaries for public meetings held on August 18, 2020, October 20, 2020, and June 8, 2021 relating to the 10 CFR 2.206 process and revisions to MD 8.11. We assume the requester prefers

transcripts, if the meetings were transcribed. So please provide us an estimate to for the transcripts, if they exist. If any of the meetings were not transcribed, please let us know the estimate for the summaries. Of course, if you have both, please let us know that, and include the estimates for each.

Sometimes, we task you for a fee estimate, but your office does not have responsibility for, or involvement in, the subject matter of the request. If we have misdirected our tasking, please tell us that instead of responding "no records." But, if you (or your staff) actually searched and found no responsive records, please tell us that you searched and found no records. Remember to include the amount of time spent searching (and at what level).

The FOIA request should be processed in accordance with the standard instructions ("How to Respond to an Initial FOIA Request") at ML060590485.

To ensure that search time is calculated appropriately and consistently, search is the time spent looking for material subject to a request, either manually or by automated means, including time spent in page-by-page or line-by-line identification of responsive material within records. Searches should identify all paper and electronic records maintained by your office, including records in any file centers or other remote locations, all versions in ADAMS, SharePoint, Nuclepedia, or other shared drives, as well as individual staff members' Outlook, Office, and other computer files, audio and video tapes, and any other media. If you or your staff believes that a Capstone official (in general, Office Directors or above), may have had records responsive to the request, please remember to include an estimate for a search to CapstoneResource@nrc.gov.

Please be sure to distinguish the search time based on the three levels: SES/Commissioner, professional (technical/managerial), or clerical. In addition, if any of the search time is expected to be performed by a contractor, please provide a fee estimate for the contractor's search, using the hourly rate the NRC is billed for the contractor's services.

You are encouraged to ask for a scoping discussion with the requester when you believe it would be beneficial.

In addition to tasking any subject matter experts within your office, please ensure that your fee estimates take into account searches of shared platforms, such as ADAMS, SharePoint, shared network drives, and Nuclepedia. You are encouraged to ask for assistance in performing adequate ADAMS searches if you have any difficulty doing a search.

NRC Form 496, "Report of Staff Resources for Processing FOIA Requests," is attached for your use.

Please remember to charge time spent on this FOIA to CAC ZF0000.

Please contact me if you have any questions.

Thank you.

Regards,

Stephan M. Ellis
FOIA Analyst (Pathfinder Consultants Contractor)
OCIO/GEMS/FLIC
U.S. Nuclear Regulatory Commission
Mail Stop: TWFN-06A-60M Office Location: TWFN-06-A00
Rockville, Maryland 20555-0001
(301) 415-3655

From: admin@foiaonline.gov
To: [Ellis, Stephan](#)
Subject: [External_Sender] FOIA Assignment for NRC-2022-000020
Date: Wednesday, November 10, 2021 11:12:32 AM

You have been assigned to the FOIA request - NRC-2022-000020. Once logged into FOIAonline, you can navigate to this case by following this link: [View](#). Additional details for this item are as follows:

- Tracking Number: NRC-2022-000020
- Requester: Paul M Blanch
- Request Track: Simple
- Submitted Date: 11/10/2021
- Due Date: N/A
- Description:
- Short Description: N/A
- Description: Three meetings were held with the Public and the NRC related to the 19 CFR 2.206 process and revisions to MD 8.11. These meetings took place on August 18, 2020; October 20, 2020. I participated in the June 8, 2021 meeting. Please provide a transcript of all three of these meetings or a written summary of the same.

From: [Burnell, Scott](#)
To: [Shoop, Undine](#); [Suber, Gregory](#); [Russell, Andrea](#); [Evans, Jonathan](#); [Carusone, Caroline](#); [Wrona, David](#); [Buckberg, Perry](#); [Pham, Bo](#)
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Subject: RE: ACTION: FOIA NRC-2022-00020 - Fee Estimate Due Nov 23rd
Date: Wednesday, November 17, 2021 9:06:00 AM

Well, if that's what he wants to talk about, now we know how to answer.

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To: Burnell, Scott <Scott.Burnell@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Carusone, Caroline <caroline.carusone@nrc.gov>; Wrona, David <David.Wrona@nrc.gov>; Buckberg, Perry <Perry.Buckberg@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>
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FYI – from Blanch

From: Kauffman, Lisa <Lisa.Kauffman@nrc.gov>
Sent: Wednesday, November 17, 2021 8:03 AM
To: Shoop, Undine <Undine.Shoop@nrc.gov>
Subject: ACTION: FOIA NRC-2022-00020 - Fee Estimate Due Nov 23rd

Hi Undine,

Would you have summaries or transcripts of the meetings described in this FOIA? Or, can you direct me to who would have them? Right now this FOIA is just in the estimate phase asking for (1) search time, (2) review time, and (3) approx. page count The estimate is due back to me by 11/23.

Let me know if I should send this to someone else.

Thanks,

Lisa Kauffman, FOIA Coordinator
Reactor Program Services Branch II
Division of Resource Management and Administration
Office of Nuclear Reactor Regulation
FOIA CAC: ZF0000

From: Ellis, Stephan <Stephan.Ellis@nrc.gov>
Sent: Wednesday, November 17, 2021 7:36 AM
To: NRR FOIA Resource <NRRFOIA.Resource@nrc.gov>
Cc: Kauffman, Lisa <Lisa.Kauffman@nrc.gov>; Stevens, Margo <Margo.Stevens@nrc.gov>

Subject: RE: NRC-2022-00020 - Fee Estimate Due Nov 23rd

Good morning,

This requester has been placed in the "non-excepted" fee category, being responsible only for search fees in excess of two (2) hours and duplication costs after receiving 100 pages free of charge. Therefore, your initial fee estimate of search fees and duplication costs is required on or before Tuesday November 23, 2021.

- Please note – The Requester is seeking transcripts or summaries for public meetings held on August 18, 2020, October 20, 2020, and June 8, 2021 relating to the 10 CFR 2.206 process and revisions to MD 8.11. We assume the requester prefers transcripts, if the meetings were transcribed. So please provide us an estimate to for the transcripts, if they exist. If any of the meetings were not transcribed, please let us know the estimate for the summaries. Of course, if you have both, please let us know that, and include the estimates for each.

Sometimes, we task you for a fee estimate, but your office does not have responsibility for, or involvement in, the subject matter of the request. If we have misdirected our tasking, please tell us that instead of responding "no records." But, if you (or your staff) actually searched and found no responsive records, please tell us that you searched and found no records. Remember to include the amount of time spent searching (and at what level).

The FOIA request should be processed in accordance with the standard instructions ("How to Respond to an Initial FOIA Request") at ML060590485.

To ensure that search time is calculated appropriately and consistently, search is the time spent looking for material subject to a request, either manually or by automated means, including time spent in page-by-page or line-by-line identification of responsive material within records. Searches should identify all paper and electronic records maintained by your office, including records in any file centers or other remote locations, all versions in ADAMS, SharePoint, Nuclepedia, or other shared drives, as well as individual staff members' Outlook, Office, and other computer files, audio and video tapes, and any other media. If you or your staff believes that a Capstone official (in general, Office Directors or above), may have had records responsive to the request, please remember to include an estimate for a search to CapstoneResource@nrc.gov.

Please be sure to distinguish the search time based on the three levels: SES/Commissioner, professional (technical/managerial), or clerical. In addition, if any of the search time is expected to be performed by a contractor, please provide a fee estimate for the contractor's search, using the hourly rate the NRC is billed for the contractor's services.

You are encouraged to ask for a scoping discussion with the requester when you believe it would be beneficial.

In addition to tasking any subject matter experts within your office, please ensure that your fee estimates take into account searches of shared platforms, such as ADAMS, SharePoint, shared network drives, and Nuclepedia. You are encouraged to ask for assistance in performing adequate ADAMS searches if you have any difficulty doing a search.

NRC Form 496, "Report of Staff Resources for Processing FOIA Requests," is attached for your use.

Please remember to charge time spent on this FOIA to CAC ZF0000.

Please contact me if you have any questions.

Thank you.

Regards,

*Stephan M. Ellis
FOIA Analyst (Pathfinder Consultants Contractor)
OCIO/GEMS/FLIC
U.S. Nuclear Regulatory Commission
Mail Stop: TWFN-06A-60M Office Location: TWFN-06-A00
Rockville, Maryland 20555-0001
(301) 415-3655*

From: Sheehan, Neil
Sent: Wednesday, August 25, 2021 1:03 PM
To: Watson, Bruce; Sturzebecher, Karl
Subject: FW: Re: Indian Point PSDAR Meeting

FYI

It's not clear to me why he thinks I misinterpreted his request.

From: Paul <pmblanch@comcast.net>
Sent: Wednesday, August 25, 2021 11:57 AM
To: Sheehan, Neil <Neil.Sheehan@nrc.gov>
Cc: (b)(6)
(b)(6)
Bartley, Malion <Malion.Bartley@nrc.gov>
Subject: [External_Sender] Re: Indian Point PSDAR Meeting

Neil

Thank you and I will be responding to your note below. It appears you have misinterpreted my request. We will be making a formal request to either directly to the commission or the executive Director for operations for a question and answer round table type of meeting Described in the recent revised NRC policy

Paul

Sent from my iPad

On Aug 25, 2021, at 10:39 AM, Sheehan, Neil <neil.sheehan@nrc.gov> wrote:

Paul,

The Commission Policy Statement on Enhancing Participation on NRC Public Meetings, published on March 19th in the Federal Register, redefines the three categories of public meetings offered by the agency. It also identifies the level of public participation offered at each category of meeting. Your request indicates that you are interested in another session that would fall under the category of "Comment-Gathering Meeting". The Federal Register notice cites as examples of such meetings town hall and roundtable discussions, environmental impact statement scoping meetings and workshops.

We would like to point out that both our public meeting on July 29th in Tarrytown, N.Y., and our virtual meeting on Aug. 18th were conducted specifically to solicit public comments on the Post-Shutdown Decommissioning Activities Report, or PSDAR, for the Indian Point nuclear power plant. We received dozens of public comments at these meetings, as well as during a government-to-government meeting held on July 29th. As part of our review of PSDARs, we have a mandate to hold public comment-gathering meetings and we have conducted these for each and every plant entering the decommissioning process. In addition, we held a public webinar in the spring of 2020 to educate the public about the decommissioning of Indian Point and our inspections and reviews associated with those activities.

Your request for a roundtable or town hall meeting regarding the Indian Point decommissioning plans would go above and beyond those interactions and we currently have no plans for such a session. Your request will be considered by NRC senior management and we will inform you of any changes. However, as of now, our focus will be on considering the large number of public comments already provided. And we would note that the window to submit written comments on the Indian Point PSDAR will remain open until Oct. 22nd.

Neil Sheehan
NRC Public Affairs
(610) 337-5331

From: Paul Blanch <pdblanch@comcast.net>
Sent: Friday, August 13, 2021 10:15 AM
To: Sheehan, Neil <Neil.Sheehan@nrc.gov>
Cc: Paul M. Blanch <pdblanch@comcast.net>
Subject: [External_Sender] Indian Point PSDAR Meeting

Neil

I heard a rumor there is going to be another meeting due to technical problems with the last one. Any truth to this rumor?

When can I expect a response to my questions on the new NRC Policy on open meetings with the public?

Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pdblanch@comcast.net
Cell 860-922-3119

From: Shoop, Undine
Sent: Thu, 18 Nov 2021 21:38:37 +0000
To: Burnell, Scott; Screnci, Diane; Sheehan, Neil
Subject: Info on for Mr. Blanch meeting - FW: Voice Message From: WIRELESS CALLER, 8609223119
Attachments: Public Meeting Transcripts.docx

Hi,

I wanted to forward the attached in case it helps with our discussions with Mr. Blanch. Andrea went through the two transcripts (only the 2 and 3 meeting were transcribed) and extracted Mr. Blanch's comments.

Cheers,
Undine

From: Russell, Andrea <Andrea.Russell@nrc.gov>
Sent: Tuesday, November 16, 2021 11:03 AM
To: Buckberg, Perry <Perry.Buckberg@nrc.gov>; Carusone, Caroline <caroline.carusone@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>
Cc: Wrona, David <David.Wrona@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

So I found the October 20, 2020 and June 8, 2021 transcripts and extracted Paul's comments (including a few responses we provided him at the meeting). I could not find the other transcript to the first meeting. Forgive any formatting issues.

From: Buckberg, Perry <Perry.Buckberg@nrc.gov>
Sent: Tuesday, November 16, 2021 9:32 AM
To: Carusone, Caroline <caroline.carusone@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>
Cc: Wrona, David <David.Wrona@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

Folks,

To help show the bigger picture of Paul Blanch's agency interactions, attached is a letter dated November 12, 2021, from Paul Blanch to the EDO regarding his dissatisfaction with recent SONGS related interactions (petitions and letters).

Thanks,
Perry

From: Carusone, Caroline <caroline.carusone@nrc.gov>

Sent: Tuesday, November 16, 2021 9:17 AM

To: Russell, Andrea <Andrea.Russell@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>

Cc: Wrona, David <David.Wrona@nrc.gov>; Buckberg, Perry <Perry.Buckberg@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>

Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

I'm just throwing this out there for consideration... and I'm hesitate to provide additional "escalation channels," but – would there be any benefit in either Dave Wrona or I reaching out to him? We would be "new" to this discussion and perhaps having someone that he perceives is less biased might help? On the other hand, he might find it frustrating that there are new players. Thoughts?

From: Russell, Andrea <Andrea.Russell@nrc.gov>

Sent: Tuesday, November 16, 2021 9:02 AM

To: Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>

Cc: Carusone, Caroline <caroline.carusone@nrc.gov>; Wrona, David <David.Wrona@nrc.gov>; Buckberg, Perry <Perry.Buckberg@nrc.gov>

Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

So Jonathan got another call this morning. I truly think someone (Gregory or Undine?) needs to reach out to Paul sooner than later. As for the transcripts, I don't see how we could ask Perry to go through the transcripts since Perry wasn't part of the WG. I can go through the transcripts if needed.

From: Suber, Gregory <Gregory.Suber@nrc.gov>

Sent: Monday, November 15, 2021 5:46 PM

To: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>

Cc: Carusone, Caroline <caroline.carusone@nrc.gov>; Wrona, David <David.Wrona@nrc.gov>

Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

Jonathan,

I believe Undine or I should call Mr. Blanch. He has contacted Senator Gillibrand and we have a briefing with her staffers tentatively scheduled for December 2nd. I need someone – hopefully the current 2.206 PM – to extract Mr. Blanch's comments from the transcripts of our public meeting. He has informed the Senator that we were not responsive to his questions and comments.

I do not think you or Andrea should engage him since we have permanent staff work on 2.206. We should handle this within DORL.

Thanks,

From: Evans, Jonathan <Jonathan.Evans@nrc.gov>

Sent: Monday, November 15, 2021 5:07 PM

To: Suber, Gregory <Gregory.Suber@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>

Subject: Fwd: Voice Message From: WIRELESS CALLER, 8609223119

Hey all,

I am on travel right now. Are any of you able to respond to Paul?

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From: WIRELESS CALLER <<tel:8609223119@officelinx.nrc.gov>>

Sent: Monday, November 15, 2021 7:04:00 AM

To: Evans, Jonathan <Jonathan.Evans@nrc.gov>

Subject: Voice Message From: WIRELESS CALLER, 8609223119

October 20, 2020 Meeting

Paul Blanch: Good afternoon David and all those other people. I've got no questions, but I have very significant comments. Being that I was the initiator of this whole thing with the Inspector General and the author of the 2.206 petition, I probably have significant knowledge. At the beginning of the meeting, the words "public confidence in the process" were mentioned. From my relationship with those people that have submitted 2.206 petitions, I think if you want to improve public confidence you should find out what public confidence those people over the past number of years have in this process. I know if you asked me, my confidence is zero.

Now, let me first of all get to an issue that has not been properly resolved. If we look at the OIG Event Inquiry, I think it's 16-024 whatever. I was working on it this morning and this is something everyone's got to take to heart. In that OIG Event Report or Inquiry, there were 14 times it mentioned that inaccurate information was provided by the NRC, primarily to me. There was also one or two statements that talked about how the NRC misrepresented information. Now I would have thought after my discussions with Dave Skeen and everything, that that would have raised a flag, and we, the NRC, would have really determined a way to make sure that anything that is sent to the petitioner is accurate, complete, so on, and so forth. Now a petition was filed on February 4th by Public Watchdogs and, of course, I was the author of that. That petition had to do with flooding of the FSC system with 73 canisters being potentially flooded. We received a letter from Kevin Williams, dated September 1st of this year, that contained incredible amounts of inaccurate and incomplete information. Totally, totally bogus. Regarding that letter, as you have previously discussed before it went out, I would have expected some type of interest independent review to assure that the rejection of the petition was properly justified by the references provided in the rejection letters. We will have a response to that. However, again, after all of this and everything I have been through with Indian Point, the Inspector General, and everyone that's been involved here, we're still getting inaccurate, incomplete, and in some cases, intentionally misleading information. That's a serious accusation that I'm making, and I'll deal with that. When the NRC is either rejecting or proposing to reject a petition, which is my case here on that September 1st letter, or the final director's decision, what assurance do we have that the information provided in these documents is in fact complete and accurate? As of September 1st, the NRC continues to intentionally mislead members of the public and the millions of residents, especially around the San Onofre Plant. We had it with the Indian Point Plant, but it's just Déjà vu and the NRC needs to look at that. I will be outlining all the false information that was provided by the NRC in a response within the next week. It's incredible. We have technical specifications that are obsolete, and these are referenced in the response that absolutely cannot be met. These are legal licensing documents whereby the NRC is misleading us, the public, myself, and my client and nothing has improved. I apologize for sounding so negative, but I've been working on my response to Mr. Williams' letter for the past few days and interfacing with other federal agencies. That's all (unintelligible).

Scott Burnell: Paul. Thank you, Paul. Again, Scott Burnell from Public Affairs. Whenever you submit your letter, the staff will review it. They did take a great deal of time in putting together an extensive letter closing out the petition and the staff does stand by that. Do you have any specific?

Paul Blanch: (Unintelligible).

Scott Burnell: Was it a question regarding the recommendations that we're discussing today?
Paul Blanch: Absolutely, the petition was not closed out. It was just rejected. So, it was never even accepted.

Scott Burnell: That is one of the potential outcomes of the process. The staff can determine that a petition is not suitable for review. So again, do you have any questions or comments on the recommendations that we're discussing today?

Paul Blanch: My comments are the NRC has got to look very carefully. I think David Skeen mentioned it. They have to look, very carefully, at the proposed response to a petitioner to assure its accuracy. This has not been done and it's got to be done.

Scott Burnell: We'll take that as a comment. Thank you, Paul.

June 8, 2021 Meeting

Coordinator: Thank you. Our first question comes from Paul Blanch. Your line is open.

Paul Blanch: Well, thanks very much for this opportunity. This is the first meeting that I've heard about on the 2.206 process. I think in some respects you are missing the boat.

I was obviously the one who initiated the OIG investigation and numerous meetings with them as I'm sure the NRC staff has had with them.

Subsequent to the report that came out in February of last year, I spent quite a bit of time working with David Skeen and his executive management team on recommendations, primarily on technical issues. I've also had a few meetings with Petition Review Boards.

And again, I don't think that what is being proposed here is going to address the questions I have and certainly some other people have who are not on this particular phone call.

One or two of the issues that were clearly identified in the Inspector General report but never addressed in any of your slides. Our statements in the IG report, such as the NRC provided an inaccurate description of the work the NRC conducted to assess the stakeholders' concern.

Inaccurate information, you know, as a licensee we have either 50.5 or 50.9. And when a licensee submits inaccurate information to the NRC, there are sanctions and civil penalties and criminal penalties that could be imposed on the licensee.

Now here we have the NRC providing what I call a politically correct name, inaccurate, incomplete information to the public that the NRC serves.

And here we have a meeting to address some of the issues, or the major issues, in the OIG report. To me, this is one of the major issues and how do we stop the NRC from putting out inaccurate information which, if it went the other way, sanctions and criminal penalties could occur?

The other statement that the OIG report said, NRC misrepresented the assumptions using the follow-up bounding analysis. Again, we're talking NRC putting out bad information to the petitioner.

Something needs to be done. It needs to be done and sanctions need to be imposed on those people that are responsible. This is not acceptable to me as a member of the public.

Now, moving on to some of the other issues I have. And I received - well I have two Petitions essentially open. One has to do with the flooding analysis San Onofre Nuclear Power Station in California.

That Petition was rejected because the NRC determined it was a previously analyzed event. Nothing could be further from the truth. How do we prevent the NRC from making these false statements, and I do mean false statements, and incomplete information to the petitioner?

I mean, the BS that was put out in the Kevin Williams September 1st letter was just absolutely incredible, inaccurate, incomplete. We need to stop that.

The second Petition was submitted in October of 2020. This Petition is also being rejected on the same basis. We've had a preliminary rejection already by email.

And the other thing this group really, really needs to take a careful look at, 2.206 clearly stated, whether I agree with it, but it is a rule, that for a petitioner once there is a director's decision, there is no appeal by the petitioner.

The NRC in some of their communication with me has inferred that the non-acceptance of a Petition cannot be overruled, appealed, reconsidered or anything else. That is not stated in the rule itself, 10 CFR 2.206.

Another problem we have, when we have a problem, a safety problem, regulatory compliance or any problem, be it a family problem, a problem with our children or whatever, we always find that a dialogue works best.

Now we went through within the past two months a two hour presentation with the NRC and the Petition Review Board on the issue of credible events and not credible. And I believe it was 18 times I was told I am not allowed to ask any questions.

That just shuts off any dialogue. That has got to be resolved. In your Management Directive 8.11, it allows the licensees to ask questions as well as other participants in the meeting. But the petitioner who has the concern, and I was told emphatically eight times, we have a video of it, that we cannot ask questions.

How can we solve a problem, and we do have outstanding two major problems, the one on the flooding of San Onofre and the one on the definition and how is it used for credible events?

I have a simple question that I want to ask and that has to do with a dry cask. I talked to Andrea Kock and asked her what is the impact should the canister that contains the spent fuel should it lose its helium overpressure. And she said, I can't answer that because it's in the 2.206 process.

Now, here we have a Catch-22. Directors can't answer my question. They tell me go through the 2.206 process. I go through the 2.206 process, and what am I told? We can't answer any questions.

So the resolution, I believe, that if a Petition either, well, is not accepted for consideration because it has been whatever the reasons are given in Management Directive 8.11, analysis has already been conducted.

If that is going to be the NRC's position that the analysis has already been conducted, that analysis, or at least the summary - now I agree or admit that on the flooding analysis Holpak has determined it not to be proprietary, that doesn't prohibit the NRC attesting to the fact that

here are the results. Here's a summary of the results of the analysis and this is why your Petition is rejected.

All I get in the rejection is that analysis has already been conducted. That is not the right way to do business. We both have problems, both the NRC and us members of the public. And if we can't have an open dialogue to discuss the problems, all we're going to do is lock horns and bang heads. And that's what we've been doing.

And it was the OIG report that alluded to some of these facts that are not being addressed. And I just read some of them to you. Go back to the OIG Report 16-024. And don't cherry pick the easy problems. Go to the big problems where the NRC is putting out misinformation, inaccurate and incomplete information and in my words absolute lies.

What is being done as far as sanctions to those people that are causing this and what is being done to prevent that from recurring? Again, those are the major issues I have.

It's just that every time, and I've probably in my life over the last 30 years submitted maybe 8 or 10 Petitions, some of them accepted and some rejected, but all of them obviously have been rejected by the director. We as the public just don't stand a chance.

Look at the statistics that I presented. Back in 1993 based on an Inspector General's report and my testimony before the U.S. Senate, only two Petitions out of 400 plus were ever accepted. And the numbers have gotten worse since that time.

We need to change the process. Don't pick the low hanging fruit that you're doing right now. Get to the root cause of the process and the problem. Get the NRC to tell the truth.

And if they're going to say an analysis has already been conducted then provide a copy of the analysis or a summary of the analysis if it happens to be security related or proprietary information but just don't tell us. We put a lot of time and trouble into these Petitions, believe me.

And I know we cause a lot of heartaches and headaches with the NRC. But when we get to this stonewalling each other - and I think I've been open as indicated by my communication with the OIG and Dave Skeen's team and the PRBs and so on and so forth, I've been more than cooperative. I've been open.

And I get Mr. Williams up there telling me in a somewhat controversial manner, Mr. Blanch. You're not allowed to ask any questions, that's not part of 2.206. That's part of the 8.11 process that was developed. And I know this to be a fact in conjunction with - well first of all by the NRC and in conjunction with NEI, which at the time might have been NUMARC.

So the public is blocked, totally blocked in public meetings. This is the only time I've had a chance to fully vent. And if I sounded too harsh, I apologize. But I think I've got good points. I've got valid points. And I hope that the NRC will take these points very seriously.

They are being transcribed. This transcription will be circulated. And I thank you for your time. And I'd like to hear what the other commenter has to say. And I am done. And again, thanks again for your time.

Brett Klukan: Thank you very much, Mr. Blanch. I'm going to turn it over to Greg for a response. So with that, Greg or Gregory.

Gregory Suber: Hey, so I will kind of respond at the end. And I'm just willing to forego that for right now and listen to the comments from the other commenter. But I have taken some notes and I am going to address some of Mr. Blanch's points, which I really appreciate.

Gregory Suber: Okay. Yes. So thanks, Brett, and I appreciate the question. And, you know, so I'll just kindly remind everyone what this meeting designed for is to address the proposed changes that we have set forward for the 2.206 process.

And I understand that there is some curiosity regarding specific 2.206 Petitions in the way the technical staff has dispositioned those Petitions. But this just isn't the forum for us to address those specific questions.

What we're really talking about today, and the input that we were looking for today, was on the proposed changes that we are making to this process, some of which were changes in response to the IG report and the subsequent evaluation from the task force and others were changes in response to the other two public meetings that we held.

And so that's the focus of this particular meeting and that's what I would like to respond to. So Mr. Blanch raised a couple of really good points when he was talking about the IG inquiry and the resultant evaluation report from the expert staff, from the expert panel.

And one of the things that we did in response to that is we looked at the information and how it was being communicated in the process. And we did find some disparities. We found some information that was reported that wasn't properly documented.

And so we looked at our process and we made two pretty significant changes to what we are doing for 2.206 Petitions. And one of those changes is explicit direction to the staff in providing documentation during a 2.206 process.

And what the core team is designed to do is to make sure that that's going to be done consistently moving forward for every 2.206 Petition that the agency receives so that proper documentation is being addressed under the auspices of revising this process.

And the other thing that we're doing is incorporating where practicable and appropriate peer reviews so that people who were not connected to the original assessment can take a fresh look at what was done in that Petition to give it a second peer review or a second check.

And in addition to that, if the expertise doesn't exist within the staff to verify that, meaning if the experts from the staff were used to generate the report, we've opened the option for ourselves to decide if it would be appropriate for us to elicit the help from contractors, which we do throughout the agency, throughout every technical division within the NRC and to give us that qualified second look.

So there were a number of changes that we made to address the OIG's concern on document accuracy and inconsistency. And so I wanted to make sure I made those clarifications.

And I know that there is a lot of interest in SONGS and there is a lot of interest in other technical portions of what we do. But this is not the meeting for us to address those concerns. So we'll have to table that for another time and maybe go back and look and decide as a staff what would be the proper forum for us to discuss, you know, particular technical issues.

And it will probably be in the disposition of those specific concerns with the Petition Review Board. But it's not in this meeting, which is laser focused on just the process. That's it.

Paul Blanch: Thank you very much, Greg. I just have some comments on what you just said. You referred to peer review. I'm not sure what a peer review is. But I have followed nuclear safety culture and, you know, all the stuff on nuclear safety culture, both within the NRC and outside the NRC.

And we can, you know, look at NRC people that have been persecuted. Having a peer review by NRC personnel with the culture that exists, almost everyone, at least at a high level, if they ever want to progress, will ever disagree with management's desires. The culture is horrible. And that peer review should actually be done by someone independent of the NRC.

The other thing, Greg, that you mentioned is, here we go on a Catch-22. You said something along the lines this is not a forum to answer questions. Well, I think I talked about that before.

The PRB is not a forum of answer questions. This session, which is at a higher level, revising 8.11, this is not a forum to ask a question. Something needs to be in 8.11 which will facilitate or allow a dialogue between the petitioners.

Now someone just - Greg, I think it was you that made a statement that everyone was in agreement that the pipeline is safe, the pipeline interaction with the nuclear plant at Indian Point.

Once the plant has been shut down, I believe that the probability of a major catastrophic accident is acceptable where we are right now. Prior to its shut down a little over a month ago, that plant was not safe. And it was not safe, as I've told the NRC, and again could never have a dialogue was if there was an explosion of the lines go through the site 400 feet from the NR3 control room that unignited gas going into the control room could ignite in the control room and that would be catastrophic.

In response I get from the NRC well, the operators would smell the gas and take some action. That didn't go over well with me. But the other even more important thing is the switch gear room was located right below the control room and should unignited gas get in there and be ignited by sparks and motors and switchgear and so on and take out the switch gear room, we have a disaster. There is no doubt about it.

And I think that someone now making a statement that the OIG or whomever determined that the Indian Point interaction demonstrated it was safe is just another misleading statement and how do we prevent those types of statements?

And my last comment is Geri and I, Geri Shapiro and I have known one another for a long time. And I wanted to thank Geri Shapiro and the Senator for their interest in this very, very important topic. And whatever the Senator could do to allow open communication between concerned members of the public and the NRC would certainly be of help to all of us and for public safety.

And with that I'll shut my long winded mouth. Thank you very much.

From: [Russell, Andrea](#)
To: [Suber, Gregory](#); [Shoop, Undine](#)
Cc: [Evans, Jonathan](#)
Subject: RE: Just got phone call and voicemail from Paul Blanche
Date: Friday, November 12, 2021 12:09:57 PM

He apparently left one for Jonathan as well. Let me see if I can figure out how to forward it since it is on my cell phone (went to my cell voicemail instead of work).

From: Suber, Gregory <Gregory.Suber@nrc.gov>
Sent: Friday, November 12, 2021 12:44 PM
To: Russell, Andrea <Andrea.Russell@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>
Subject: RE: Just got phone call and voicemail from Paul Blanche

Andrea,

I have not. You can forward the call to me. Not sure what actionable task will come out of it.

From: Russell, Andrea <Andrea.Russell@nrc.gov>
Sent: Friday, November 12, 2021 12:25 PM
To: Shoop, Undine <Undine.Shoop@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Subject: Just got phone call and voicemail from Paul Blanche

Regarding the SECY that was issued. I'm off this afternoon. Have you all received any phone calls from him? Should I call him back?

Andrea Russell
Safety and Plant Systems Engineer
Nuclear Regulatory Commission
NRR/DSS/STSB
301-415-8553

From: [Burnell, Scott](#)
To: [Morris, Scott](#); [Williams, Kevin](#)
Subject: FW: Fwd: Letter to David Victor Chair San Onofre CEP
Date: Thursday, April 01, 2021 3:39:00 PM
Attachments: [Final Signed letter to David Victor CEP.pdf](#)
[pastedGraphic.png](#)
[pastedGraphic_1.png](#)
[pastedGraphic_2.png](#)

Hi Scott;

FYI -- Blanch has also submitted the questions (not the discussion of the conduct of the meeting) to the 2.206 petition review board.

Scott

From: Paul Blanch <pdblanch@comcast.net>
Sent: Thursday, April 01, 2021 2:08 PM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; Morris, Scott <Scott.Morris@nrc.gov>
Cc: Paul M. Blanch <pdblanch@comcast.net>; Charles Langley <langley@publicwatchdogs.org>;
(b)(6)
Subject: [External_Sender] Fwd: Letter to David Victor Chair San Onofre CEP

Dear Scotts:

FYI

Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pdblanch@comcast.net
Cell 860-922-3119

Begin forwarded message:

From: Paul Blanch <pdblanch@comcast.net>
Subject: Letter to David Victor Chair San Onofre CEP
Date: March 31, 2021 at 6:01:32 PM EDT
To: david.victor@ucsd.edu
Cc: "Paul M. Blanch" <pdblanch@comcast.net>, (b)(6),
mmcnicholas@capousd.org, Lisa.Bartlett@ocgov.com, garry@coastkeeper.org,
Jim.Desmond@sdcounty.ca.gov, DuncanC@san-clemente.org,
Rob.Howard@uwua246.com, (b)(6),
(b)(6), jtaylor@sanjuancapistrano.org, info@slrmissionindians.org,
mvillar@danapoint.org

Mr. Victor:

Per your invite to write to you during the recent CEP meeting. please see enclosed letter to you as Chair of the San Onofre CEP. Please feel to share with other panel members.

Paul M. Blanch PE

Energy Consultant

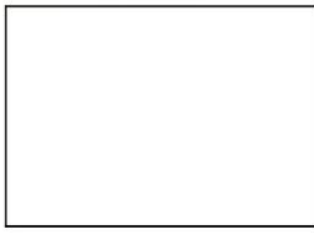
Wednesday, March 31, 2021

Dr. David G. Victor
Chair, SONGS Community Engagement Panel
UC San Diego School of Global Policy & Strategy
RBC #1405, 9500 Gilman Dr. #0519
La Jolla , California 92093-0519

Dear Dr. Victor and the SONGS Community Engagement Panel (CEP) members:

I am responding to your kind invitation to write you regarding basic unanswered safety questions on behalf Public Watchdogs.

You will recall that prior to the SONGS Community Engagement Panel meeting on March 18, 2021, I sent three questions in advance using the posted links in the slide shown at left below. My understanding was that these questions and comments would be addressed first. The questions were passed on to SCE and then conveniently “ducked” without any truthful response.





(View the this slide on page 4, at <https://bit.ly/31nEUkD>)

Statement at <https://bit.ly/3cvr1YP>, minute 1:10:52 of [original recording](#).

Near the end of the meeting, at Minute 1:10:52 of the [proceedings](#), you stated:

"I saw a bunch of comments about Paul Blanch not being able to speak. When he submitted his questions in advance, he said he didn't want to speak, so I would urge Mr. Blanch to send me a letter about his concerns, I'll make sure that gets addressed. And I'll also make sure that he's on the list for the next meeting."

I would appreciate your source of what I believe is the false information you stated in this video. At no time did I request that I not be asked to speak. My hand was raised during the public comment period. In addition, I pleaded in the "chat room" that I wanted to speak. During the meeting I also called Charles Langley and asked him to alert the CEP in the "chat room" that I was anxious to correct the false information being put forward by Edison.

Mr. Langley's chat room requests were ignored, along with the requests of at least four other members of the public who were asking that I be allowed to address the CEP.

Equally troubling, John Dobken, Southern California Edison's media relations officer, posted a link to derogatory article that he has written about Public Watchdogs and myself in the comments section. In my opinion, this was an intentional effort by Mr. Dobken to conceal the large number of chat room requests to the Community Engagement Panel. This action alone by Mr. Dobken, confirmed that Edison was fully aware of my requests and failed to inform the CEP of my desperate desire to correct the false information communicated to the CEP and the public.

I am alerting you to these events, because in addition to Edison's established practice of lying to the public. These are the sort of shameless public relations shenanigans that have deepened public mistrust of Southern California Edison, and the dedicated public servants who serve on the CEP.

Understandably, the Community Engagement Panel deflected my questions to Southern California Edison, which failed to provide a logical, coherent response. For example, when Mr. Bauder passed Question B to his staff, the staff's answer had nothing to do with the question. Further, in response to questions A and B, Mr. Bauder simply stated that canister failure was not credible.

For the record, these are the questions I asked prior to the CEP meeting:

Question A: The words "not credible" appear in numerous SCE docketed communication with the NRC and now with the CEC. How does SCE define "not credible" and for what time period is this claim valid?

Question B: The Technical Specifications require equipment to be readily available to recover from a flooding event within 8 hours. I have a copy of the ISFSI Emergency Plan for SONGS (FOIA 2021-000114) but it does not mention any flooding recovery equipment such as pumps, water supplies, high temperature hoses, radioactive liquid disposal and training to recover from the potential flooding of 73 canisters.

Question C: If the undefined "not credible" flooding event occurs, are SONGS personnel trained to respond to a criticality event?

The reason for these questions: The licensee has submitted its Final Safety Analysis Report (FSAR) and its Certificate of Compliance (CoC) for the ISFSI. The NRC approved these documents. Within these documents the licensee has stated numerous times that failure of the Holtec canisters is "Not Credible." This "not credible" determination is in response to the integrity requirement of 10 CFR 72.236(l), which allows Southern California Edison to dodge any and all of the requirements needed to assure integrity. Further, the NRC has formally declined to answer these questions.

Accordingly, I request that the Community Engagement panel secure competent answers to the following questions.

QUESTION 1: How does the licensee define "Not Credible" and what analysis has been conducted to support this statement?

Reason for this question: The devious use of the term "not credible" without any regulatory definition allows Edison/Holtec and the NRC to avoid addressing the design requirements of 10 CFR 72.122 and 10 CFR 72.236 and all requirements for Aging Management.

QUESTION 2: Does the licensee have equipment such as pumps, special high temperature hoses and disposal provisions for radioactive water and pure water supplies, readily available? Is there also sufficient time to prevent fuel damage that will occur within either 8 or 32 hours according to the Final Safety Analysis Report (FSAR)?

Reason for this question: In the FSAR Technical Specifications (TS), Southern California Edison discusses recovery from an analyzed flooding event as involving the insertion of some type of suction device to remove water and debris. This procedure is allegedly discussed in the site emergency plan.

QUESTION 3: What is the radiological impact of an inadvertent criticality in the event of flooding and loss of canister integrity due to this flooding event?

Reason for this question: In an official email from the NRC to Tom Palmisano RE: "Criticality impact of thin-wall dry storage canisters" sent Thursday, December 21, 2017, at 2:15:00 PM the NRC stated:

*"the criticality safety control during storage **does rely on the exclusion of water** from the canister, and that is what led the NRC staff to ask Holtec to evaluate how criticality will be prevented." (emphasis ours)*

After a detailed review of the published video and the deceptive information being conveyed to the public, you should be very concerned about your continued leadership of the panel that "is intended to serve as a conduit for public information and encourage community involvement and communication with the SONGS Co-owners on matters related to SONGS decommissioning." My concern is your independence from Edison is questionable.

I have been a member of decommissioning panels and/or conducted formal presentations before these panels. None of these panels were financed by the utility. All of them in contrast to the CEP, had some type of formal oversight from State Regulatory bodies.

I am concerned that the CEP is not truly "independent." The Community Engagement Panel is 100% funded by Southern California Edison. Aside from a handful of elected officials, the panel members are hand-selected by Edison using a charter written by Edison. This structure makes it impossible for the CEP to exercise truly independent oversight of decommissioning activities at San Onofre.

My goal is similar to the of the CEP charter. I want to assure that the San Onofre spent fuel is consistent in meeting the NRC's stated goal of "Protecting the Public and the Environment."

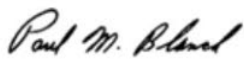
I believe it to be reasonable to inform members of the risks presented by the spent fuel and regulatory compliance identified in 10 CFR 72 and 10 CFR 71.

I am more than willing to make a presentation to the CEP at any time to provide my perspective of the risks associated with the storage of the spent fuel at San Onofre. On March 18, 2021, I along with Public Watchdogs, made a formal presentation to the NRC about San Onofre risks. I am also willing to present this vital information to the CEP should there be any interest.

I am formally requesting finally an apology from you and some assurance the CEP will commence operating as an independent panel.

I look forward to your prompt response.

Sincerely,



Paul Blanch

135 Hyde Rd.

West Hartford, CT 06117

pdblanch@comcast.net

860-922-3119

CC: Daniel T. Stetson President and Chief Executive Officer, Ocean Institute
Martha McNicholas, Capistrano Unified School District Board of Trustees
Michelle Anderson, Orange County Sheriff's Department
The Honorable Lisa Bartlett, Fifth District Supervisor, County of Orange
Garry Brown, President and CEO, Orange County Coastkeeper
The Honorable Jim Desmond, San Diego County Board of Supervisors
The Honorable Chris Duncan, City of San Clemente

Rob Howard, President, Utility Workers Union of America, Local 246, AFL-CIO
Sam Jammal, community liaison officer Marine Corps Installation West
Valentine "Val" Macedo, Laborers Intl. Union of North America - Local 89
Marni Magda Community College Professor, ret.
Edward "Ted" Quinn, President, Technology Resources, Consulting and Nuclear Industry Mgmt.
Mark Riddlebarger, Emergency Manager, California State Parks, Orange Coast District
The Honorable John Taylor, former Mayor of San Juan Capistrano
Captain Mel Vernon San Luis Rey Band of Mission Indians
The Honorable Michael Villar. Council Member City of Dana Point

Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pmb Blanch@comcast.net
Cell 860-922-3119

From: [Burnell, Scott](#)
To: [Williams, Kevin](#)
Subject: FW: Fwd: List of attendees for 3/9/2021 PRB meeting with Public Watchdogs
Date: Thursday, March 11, 2021 1:58:00 PM
Attachments: [Attendee List for 3-9-2021 PRB Meeting.pdf](#)

I'll resist the urge to suggest he review the YouTube video, where we introduced ourselves.

From: Paul Blanch <pdblanch@comcast.net>

Sent: Thursday, March 11, 2021 1:44 PM

To: (b)(6)

(b)(6)

Cc: Paul M. Blanch <pdblanch@comcast.net>; Burnell, Scott <Scott.Burnell@nrc.gov>; Charles Langley <langley@publicwatchdogs.org>

Subject: [External_Sender] Fwd: List of attendees for 3/9/2021 PRB meeting with Public Watchdogs

How would I find the titles of these NRC personnel?

Paul Blanch

pdblanch@comcast.net

860-922-3119

Begin forwarded message:

From: Charles Langley <langley@publicwatchdogs.org>

Subject: Fwd: List of attendees for 3/9/2021 PRB meeting with Public Watchdogs

Date: March 11, 2021 at 11:58:17 AM EST

To: Paul <pdblanch@comcast.net>, "Stuart Scott (Stuart Scott)"

(b)(6)

Forgive me if I have sent this list twice. - Charles

----- Forwarded message -----

From: Liu, Tilda <Tilda.Liu@nrc.gov>

Date: Wed, Mar 10, 2021, 10:44 AM

Subject: List of attendees for 3/9/2021 PRB meeting with Public Watchdogs

To: Charles Langley <langley@publicwatchdogs.org>

Cc: Burnell, Scott <Scott.Burnell@nrc.gov>

Mr. Langley,

I learned from Mr. Scott Burnell that you were looking for a list of attendees of

the PRB meeting with Public Watchdogs, held on 3/9/2021.

Attached contains the names of those who were in attendance.

Tilda Liu, Petition Manager

Division of Fuel Management (DFM)

Office of Nuclear Material Safety and Safeguards

✉ R-II | ☎ 404-997-4730 | Tilda.Liu@nrc.gov

Participants (174)




Search




Panelist 22

HL	Halle Lindsay	Host, me	
TL	Tilda Liu		
CM	Charles Morrison		
AR	Alison Rivera		
AK	Andrea Kock		
CW	Charles Public Watchdogs		
CR	christopher Regan		
DD	Darrell Dunn		
DM	Dave McIntyre		
GS	Gregory Suber		
JM	John McGigan		
KW	Kevin Williams		
LH	Latif Hamdan		

LH	linda howell		
NB	Nina Babiars		
PB	Paul Blanch		
PB	Perry Buckberg		
RC	Robert Carpenter		
RS	Robert Sun		
SB	Scott Bumell		
SS	Stuart Scott		
YD	Yoira Diaz		

Attendee List




<input type="checkbox"/> Select all		  
Name (171)	Company	
78Mary Lampert	Pilgrim Watch	
A Cassell	N/A	
Adam Levin	N/A	
Al Bates	Southern Cali	
Amy Rosmarin	N/A	
Amy Snyder	N/A	
Ann Grodin	N/A	

<input type="checkbox"/> Select all		  
Name (174)	Company	Fi
Barbara Laurspach	N/A	
Barbara Siny	N/A	
Barbara Warren	Citizens' Environ...	
Bodhi Jeffreys	Bodhi Jeffreys	
Brady Hanson	Pacific Northwest ...	
Brian Wright	Clear Light Trust	
Bridget Frymire	Utility Supervisor	

Benj Clarke











Berton Moldow

Attendee List









<input type="checkbox"/> Select all		  
Name (175)	Company	
Carol Slater	Eco Active 101	
Carole Hisasue	N/A	
Carolyn Maple	N/A	
Catherine Hunt	N/A	
Catherine Skopic	Sierra Club NYC G...	
Cathy Iwane	N/A	
Charles Gregoire	N/A	

Chuck Anders – Strategic Initiatives










Attendee List

<input type="text"/>		
<input type="checkbox"/> Select all		
	Name (175)	Company
	Chris Allen	N/A
	Chris Markley	N/A
	Craig Sherman	Center for Lo
	cynthia Riddle	N/A
	D.R. Zimdahl	N/A
	Dale Walkonen	FacingFuture.
	Damon Wyler	N/A

Attendee List

<input type="text"/>		
<input type="checkbox"/> Select all		
	Name (175)	Company
	Dana Gae	N/A
<input type="checkbox"/>	Daniel Franco	N/A
	Daniel Sketson	Nicholas Endowm...
	Darwin Salcedo	N/A
<input type="checkbox"/>	Daryl Gale	N/A
	Dave Rice	N/A
	David Kraft	Nuclear Energy In...

Attendee List

<input type="text"/>		
<input type="checkbox"/> Select all		
	Name (176)	Company
	Debbie Kinsinger	N/A
<input type="checkbox"/>	Debbie Salah	N/A
	Delise Konigsbach	N/A
	Derek Brice	N/A
	Diane Allen	N/A
	Diane Hennessy	N/A
	diane Screnci	N/A

Attendee List

☐ Select all

Name (176)	Company	Fe	Audio panels:
<input type="checkbox"/> Diane Turco	N/A		<input type="button" value="Allow"/>
<input type="checkbox"/> Dietmar Detering	N/A		<input type="button" value="Unmute"/>
<input type="checkbox"/> Don Safer	N/A		
<input type="checkbox"/> Dwain Wilder	Bear Meadow Folk...		Manage panels:
<input type="checkbox"/> Elaine Dickinson	N/A		<input type="button" value="Expel"/>
<input type="checkbox"/> Elizabeth Gilpin	N/A		
<input type="checkbox"/> Elizabeth Lerer	N/A		

33 in teleconference

Attendee List

☐ Select all

Name (177)	Company	Fe
Ellen Weininger	N/A	
Eric Dawson	N/A	
Eric Strahan	N/A	
Eva Meier	N/A	
Evelyn Sato	N/A	
Faton Bacaj	SDG&E	
Gloria Carranza	N/A	

Attendee List

☐ Select all

Name (175)	Company
<input checked="" type="checkbox"/> Greg Warrick	NBC - Region IV
<input type="checkbox"/> Harvey Liss	Irvine Community...
<input type="checkbox"/> Helen Cho	N/A
<input type="checkbox"/> Ian Forrest	SCE
<input type="checkbox"/> jacquelyn drechtsler	N/A
<input type="checkbox"/> James Bell	N/A
<input type="checkbox"/> James Heddike	Select or enter
<input type="checkbox"/> James Jansert	none

James Swenson

<input checked="" type="checkbox"/>	Jean Barish	Retired
<input type="checkbox"/>	Jean Stevens	N/A
<input type="checkbox"/>	Jeffrey Jordan	N/A
<input checked="" type="checkbox"/>	Jennifer Moores	N/A
<input checked="" type="checkbox"/>	Jerry Stephenson	SCE
<input type="checkbox"/>	Jill McManus	N/A
<input type="checkbox"/>	Jimmy Yang	N/A

☰	Name (171)	Company
🔍	Joan Holt	N/A
🔍	John Brady	N/A
🔍	John Dobken	N/A
🔍	john miller	N/A
🔍	jordan axelrad	none
🔍	judith cumbler	N/A
🔍	Judy Jones	retired

Name (162)	Company
Kalene Walker	N/A
Kay Cumbow	N/A
keith schue	N/A
Kyle Bischoff	N/A
Larisa Stow-Nor...	N/A
Laurie Bianchi	Marketing ...
Laurie Headrick	N/A
Linda Lewison	N/A
Lois Harkness	N/A
Lynn Southey	N/A
Manna Jo Greene	N/A
Manna Jo Greene	Hudson River Sloop Clea...
Marie Inerra	N/A
Mark Morgan	Southern Cal Edison

Kay Cumbow

Keith Schue

Kristopher Cummings

Linda Seeley

Sally G

Angel Moreno

☰	Name (161)	Company
🔍	Mary Finneran	N/A
🔍	Michael Pflaum	N/A
🔍	Michael Ravene...	N/A
🔍	Michel Lee	Council on Intelligent E.
🔍	Michelle Gordon	N/A
🔍	Nicole Jack	N/A
🔍	Nicole Vaughn	N/A
🔍	Nora Jaffe	N/A

🔍	Name (161)	Company
🔍	Nora Stewart	N/A
🔍	Patricia Cardona	Sierra Club and Sout
🔍	Paul Gunter	Beyond Nuclear
🔍	paul schumann	wise wealth choices
🔍	Peter Hudiburg	N/A
🔍	pine duBois	Jones River Watersh
🔍	R. Kokal	N/A
🔍	Randall Granaas	Southern California
🔍	Rebecca Schaller	Sandia National Laborat.
🔍	Richard Kline	Columbia Univ
🔍	robert hunziker	Independent Journalist
🔍	robert hunziker	N/A
🔍	roger johnson	N/A
🔍	ron RODARTE	N/A
🔍	Ryan Coyne	N/A
🔍	Sally G	N/A
🔍	SANDRA bowes	P.O. Box 249
🔍	Sara Altherr	none
🔍	sarah mosko	N/A
🔍	Saundra Holloway	N/A
🔍	Serge LaFondelle	N/A
🔍	Shae Harvey	Southern California Edis...
🔍	Shari Horne	N/A
🔍	Shelly Abajian	US Senator Dianne Feins...
🔍	Sheree Simpson	N/A
🔍	Stephen Kent	KentCom LLC
🔍	Steve Maheras	PNNL
🔍	Steven Vogue	Optimum Health &
🔍	Susan HitoShapiro	N/A
🔍	Susan Van Dolten	N/A
🔍	Suzannah Glidden	N/A
🔍	Suzanne Dennis	N/A
🔍	Tina Curran	N/A
🔍	Tom Boyce	NRC
🔍	Tony Leshinski	Vermont P...
🔍	William Borden	N/A

199 in attendance

33 in teleconference

From: [Burnell, Scott](#)
To: [West, Stephanie](#)
Subject: RE: Meeting gone horrible wrong, IT-wise
Date: Thursday, February 11, 2021 3:34:00 PM

That should work fine.

From: West, Stephanie <Stephanie.West@nrc.gov>
Sent: Thursday, February 11, 2021 3:29 PM
To: Burnell, Scott <Scott.Burnell@nrc.gov>
Subject: RE: Meeting gone horrible wrong, IT-wise

Trying to come up with a graphic. Don't know if there's a new meeting date.

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Thursday, February 11, 2021 3:05 PM
To: Harrington, Holly <Holly.Harrington@nrc.gov>; Castelveter, David <David.Castelveter@nrc.gov>; McIntyre, David <David.McIntyre@nrc.gov>; West, Stephanie <Stephanie.West@nrc.gov>
Subject: RE: Meeting gone horrible wrong, IT-wise

OK, I'll start drafting something.

From: Harrington, Holly <Holly.Harrington@nrc.gov>
Sent: Thursday, February 11, 2021 3:03 PM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; Castelveter, David <David.Castelveter@nrc.gov>; McIntyre, David <David.McIntyre@nrc.gov>; West, Stephanie <Stephanie.West@nrc.gov>
Subject: RE: Meeting gone horrible wrong, IT-wise

No objection. We are trying to get the Commission/Hanson Facebook post up today, but only when the video link goes live.

Holly

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Thursday, February 11, 2021 2:55 PM
To: Castelveter, David <David.Castelveter@nrc.gov>; Harrington, Holly <Holly.Harrington@nrc.gov>; McIntyre, David <David.McIntyre@nrc.gov>; West, Stephanie <Stephanie.West@nrc.gov>
Subject: Meeting gone horrible wrong, IT-wise
Importance: High

Hello all;

As Dave will attest, NOTHING went properly in trying to have a virtual petition review board meeting with Public Watchdogs and Paul Blanch. Multiple phone lines, wrong passcodes, WebEx issues, everything was screwy.

After half an hour with minimal progress towards even starting, the PRB chair, Kevin Williams, decided to call it off and reschedule, with Public Watchdogs and Blanch agreeing. Williams tried to apologize to the crowd on the public bridgeline, but apparently the operator cut the line and no one heard.

I suggested that we do a quick-turnaround Facebook post and Tweet to apologize and announce we're rescheduling. Kevin and the PRB are OK with that, I wanted to run that past you all before we dive into drafting something.

Please let me know what you think, thanks.

Scott

From: Sheehan, Neil
Sent: Tuesday, February 16, 2021 11:03 AM
To: Buckberg, Perry
Subject: FW: Fwd: Not credible

Good morning, Perry

Mr. Blanch is asking this same question again.

Neil
Public Affairs, Region I

From: Paul <pdblanch@comcast.net>
Sent: Monday, February 15, 2021 3:34 PM
To: Sheehan, Neil <Neil.Sheehan@nrc.gov>
Subject: [External_Sender] Fwd: Not credible

Neil

I would like to know how many petitions were filed and how many were found not to meet the criteria for acceptance by the PRB

Number of petitions not accepted seems ambiguous.

I think you are interested in how many were filed, and how many were found not to meet the criteria

From: Paul <pdblanch@comcast.net>
Sent: Monday, February 15, 2021 1:08 PM
To: Neil Sheehan <neil.sheehan@nrc.gov>
Cc: Paul M. Blanch <pdblanch@comcast.net>; James Lampert <james.lampert@comcast.net>; Charles Langley <clangley@publicwatchdogs.org>; (b)(6); Liu, Tilda <tilda.liu@nrc.gov>; Williams, Kevin <Kevin.Williams@nrc.gov>; (b)(6); (b)(6)
Subject: Not credible

Neil:

I need your help. I have a presentation coming up with the NRC petition review board (PRB) about the NRC's phrase "not credible" for dry cask loss of integrity. This phrase is used by most manufactures of dry casks.

I have searched everywhere and can't find a definition in 10 CFR.

Does this phrase mean impossible, less than 1 minus 6 and how long is this assumption valid?

I need this information before the PRB meeting I expect next week.

I would also appreciate answers to my questions posed to you on February 8, 2021 related to the number of 2,206 petitions not accepted.

See email below:

Neil:

The ASLB enclosed order discusses 387 petitions where there was a Director's Decision. How many additional petitions were submitted and rejected without a Director's Decision? More than 80% of my petitions were rejected by the PRB (including the Indian Point gas line), although I may be a special case. There must be some place where these rejected petitions are tracked.

The second question relates to the chart below where licensee requested some type of licensing actions or relief from the regulations. It appears to be about 900 per year. How many of these provided substantive relief?

I don't need an exact number and a percent estimate will do.

<image001.png>

Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pmb Blanch@comcast.net
860-236-0326
Cell 860-922-3119

From: norepliesplease@mymeetings.com
Sent: Wed, 9 Jun 2021 01:40:56 -0500
To: Shoop, Undine
Subject: [External_Sender] Participant List r 2164544
Attachments: VC-2164544 EIS-US NUCLEAR REGULATORY COM Shoop.xls
Importance: Normal

Please find attached to this e-mail, the participant list from your recent conference.

If you have any questions or concerns with this list, please feel free to contact the Customer Relations team in your region.

US - 1-800-475-0600 Or 210-795-0354
UK and EMEA - +44-20-7950-9949
Hong Kong and Asia Pacific - +852-2802-5158
Japan - 81-3-5539-6595

We look forward to assisting you and your company again in the near future.

Regards,

Customer Relations
Conferencing & Collaboration Services

EIS-US NUCLEAR REGULATORY COM Conference Call

CONFERENCE DETAILS:

LEADER: Ms Undine Shoop
 DATE/TIME: Jun 8 2021 @ 12:30 PM ET
 CONFIRMATION #: 2164544

Blank Fields = Indecipherable Info

ATTENDEE PROVIDED

First & Last Name Affiliation

SYSTEM CAPTURED

CALLED FROM

SPEAKERS

- 1 Andrea Russell
- 2 Brett Klukan
- 3 David McIntyre
- 4 David Wrona
- 5 Diane Screnci
- 6 Dori Willis
- 7 Gregory Suber
- 8 Jonathan Evans
- 9 Ladif Hamdan
- 10 Nikki Gilanshai
- 11 Robert Carpenter
- 12 Undine Shoop

(b)(6)

3014151680

(b)(6)

PARTICIPANTS

- 13 Baleu NRC
- 14 Billie Garde Clifford & Garde
- 15 Brian
- 16 Caroline Carusone US NRC
- 17 Charles Langley Public Watchdogs
- 18 David Skeen NRC
- 19 Denise Hannigan NRC Office of the Inspector General
- 20 Geri Shapiro Senator Kirsten Gillibrand Senior Advisor
- 21 Jenny Weil US NRC
- 22 Logan Martens US NRC
- 23 Neil Sheehan NRC
- 24 Nilda Rivera US NRC
- 25 Nina Babiarz Public Watchdogs
- 26 Paul Blanch Energy Consultant
- 27 Perry Buckberg NRC
- 28 Peter Snyder NRC
- 29 Theresa Clark NRC
- 30 William Gott NRC
- 31 NRC

(b)(6)

2022806116

(b)(6)

8587524600

(b)(6)

8609223119

(b)(6)

NO DECIPHERABLE INFORMATION IN ANY CATEGORY PROVIDED BY PARTICIPANTS

- 32
- 33

(b)(6)

From: [Burnell, Scott](#)
To: [Cabinster, David](#)
Subject: [Re: Paul Blanch sent you some files](#)
Date: Wednesday, March 10, 2021 6:29:45 PM

Hi David;

Given Blanch keeps including the IG's office in his continued misuse of the petition process (and my ancillary role), I felt the need to ensure someone continues to point out the reality of what happened. I just wish I had access to his BCC group, which is the true audience after all.

Scott

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Wednesday, March 10, 2021 6:23 PM
To: Paul Blanch <pmb Blanch@comcast.net>
Cc: Liu, Tilda <Tilda.Liu@nrc.gov>; Williams, Kevin <Kevin.Williams@nrc.gov>; [\(b\)\(6\)](#)
Charles Langley <clangley@publicwatchdogs.org>
Subject: Re: Paul Blanch sent you some files

Hello Paul;

To recap recent events:

My contribution to yesterday's meeting was an offer to the audience to answer questions not related to the petition process. The distinction should be obvious between you, an active petitioner who has an established communication link to the petition review board, and an audience member not included in the petition.

Yesterday you clearly stated a set of questions during a transcribed meeting, meaning the questions will be part of the official record. Despite that existing documentation, you included me in an email to the review board chair with an additional copy of those questions. As a courtesy I acknowledged receipt for the staff (meaning the review board chair). As the questions were directed to the review board as part of the meeting, the questions fall outside of my offer to the audience. At no point did I state a review board position regarding those questions, since that is a technical matter outside my responsibility as a public affairs officer.

I provided a further courtesy in rescuing your DropBox email from my junk mail folder and ensuring the petition review board was aware of your communication. I continued in the spirit of courtesy by suggesting PDFs of the presentation slides would be the most accessible format. The NRC's IT resources have their limits, so please reconsider your assumption (made in a separate email received by everyone on distribution here) that it falls to the staff to somehow translate Keynote files for you. The clearest path to ensuring those slides are included in the record is for Mr. Scott or you to convert them to PDFs.

Thank you.

Scott Burnell
Public Affairs Officer
Nuclear Regulatory Commission

From: Paul Blanch <pmb Blanch@comcast.net>
Sent: Wednesday, March 10, 2021 4:47 PM
To: Burnell, Scott <Scott.Burnell@nrc.gov>
Cc: Paul M. Blanch <pmb Blanch@comcast.net>; Liu, Tilda <Tilda.Liu@nrc.gov>; Williams, Kevin <Kevin.Williams@nrc.gov>; [\(b\)\(6\)](#)
[\(b\)\(6\)](#) Charles Langley <clangley@publicwatchdogs.org>
Subject: [External_Sender] Re: Paul Blanch sent you some files

Scott:

I believe to stated during the meeting anyone can send you questions? Are you saying you are not accepting my questions as a followup to the meeting??? Because I am part of the petition process, and apparently not a member of the public, I can not submit questions to you as you stated at the conclusion of the meeting?

I feel very pleased to be in a very exclusive class.

Paul Blanch
pmb Blanch@comcast.net
860-922-3119

On Mar 10, 2021, at 3:14 PM, Burnell, Scott <Scott.Burnell@nrc.gov> wrote:

Hello Paul;

As a reminder, I am not part of the petition review board. I answered your earlier email as a courtesy. I provided my email to the audience for their general questions following yesterday's meeting.

Your attempt to use DropBox ended up in my junk mail folder; as such, it's fortunate that I saw it before it was automatically deleted. Also, the petition review board lacks the ability to open Keynote files, so I suggest turning those slides into PDFs for the widest possible compatibility.

To ensure proper agency receipt of any content related to the petition, in the future please exclude me and direct your emails to the board chair or project manager.

Thank you.

Scott Burnell

From: Dropbox Transfer <no-reply@dropbox.com>
Sent: Wednesday, March 10, 2021 2:05 PM
To: Burnell, Scott <Scott.Burnell@nrc.gov>
Subject: [External_Sender] Paul Blanch sent you some files

Download them by 3/17/2021



Paul Blanch sent you Actual NRC Presentation.key

"Please assure this is placed in ADAMS"

You can download these files now or until **3/17/2021**.

Questions? Ask Paul (paulmartinblanch@gmail.com)

[Download files](#)

Here's what they sent you

1 item • 44 MB



Actual NRC Presentation.key
44.35 MB



[Report to Dropbox](#)

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From: [Burnell, Scott](#)
To: [DeJesus, Anthony](#); [Dennis, Suzanne](#)
Subject: Per my Teams note
Date: Tuesday, November 16, 2021 11:04:00 AM
Attachments: [20211112 PMB to EDO for public dialog .pdf](#)

This is the 11/12/21 letter from Mr. Blanch to the EDO (a copy of which was furnished earlier in this released set).

Hello again;

My understanding is that NMSS is already starting to work on a reply. Blanch is also calling NRR staff who worked on the SECY for the 2.206 process revisions, and in my view that's all related. I'm hoping we can figure out how to have one single response to Blanch.

Thanks.

Scott

From: Suber, Gregory
Sent: Wed, 9 Jun 2021 11:26:51 +0000
To: Williams, Kevin;Liu, Tilda
Cc: Skeen, David;Clark, Theresa;Shoop, Undine
Subject: Public Meeting on 2.206 Petition Process

Kevin and Tilda,

Hope all is well. Just wanted to give you heads up on part of the discussion we had at the third public meeting we conducted (June 8th) on revising the 2.206 Petition Process. I do not believe there is any action or follow up required on your behalf. Just want to make you aware that Paul Blanch and Charles Langley were in attendance and made several comments regarding the SONGS petition. Specifically, Mr. Langley repeated concerns about how the staff used risk in evaluating the petition and how the determination was made that certain events/failure mechanism were not credible. I am sure none of this is new to you. However, the meeting was moderately well attended and there were some congressional staffers on the line (not sure if an from CA listened in.) As the focus of the meeting was the proposed process revisions, we did not attempt to answer technical questions and only provided information that the staff had already previously committed to responding in writing. The meeting was transcribed and we can forward you the transcription when it becomes available if you like.

Hope this helps. Please reach out to me or Undine Shoop if you have any questions. Latif Hamdan can also provide you with information as he was in attendance.

Best regards,

Gregory F. Suber
Deputy Director, Operating Reactor Licensing



From: Sheehan, Neil
Sent: Tuesday, August 24, 2021 8:59 AM
To: Watson, Bruce
Subject: RE: Re: Request for a public meeting

Bruce,

I should respond to Mr. Blanch on this. Are you good with this response?

Neil

From: Sheehan, Neil
Sent: Thursday, August 12, 2021 1:26 PM
To: Guzman, Richard <Richard.Guzman@nrc.gov>; Watson, Bruce <Bruce.Watson@nrc.gov>
Cc: Sturzebecher, Karl <Karl.Sturzebecher@nrc.gov>; Klukan, Brett <Brett.Klukan@nrc.gov>
Subject: RE: Re: Request for a public meeting

Here is my proposed response. Our options would be me sending this to Mr. Blanch in advance of the meeting or having Bruce, Brett or someone else speak to it during the virtual meeting.

Please advise how a member of the public could make a request for a "round table or town meeting" type of public meeting as described in the Commission Policy (enclosed).

Proposed response: The Commission Policy Statement on Enhancing Participation on NRC Public Meetings, published on March 19th in the Federal Register, redefines the three categories of public meetings offered by the agency. It also identifies the level of public participation offered at each category of meeting. Your request indicates that you are interested in another session that would fall under the category of "Comment-Gathering Meeting". The Federal Register notice cites as examples of such meetings town hall and roundtable discussions, environmental impact statement scoping meetings and workshops.

We would like to point out that both our public meeting on July 29th in Tarrytown, N.Y., and our virtual meeting on Aug. 18th were conducted specifically to solicit public comments on the Post-Shutdown Decommissioning Activities Report, or PSDAR, for the Indian Point nuclear power plant. We received dozens of public comments at these meetings, as well as during a government-to-government meeting held on July 29th. As part of our review of PSDARs, we have a mandate to hold public comment-gathering meetings and we have conducted these for each and every plant entering the decommissioning process. In addition, we held a public webinar in the spring of 2020 to educate the public about the decommissioning of Indian Point and our inspections and reviews associated with those activities.

Your request for a roundtable or town hall meeting regarding the Indian Point decommissioning plans would go above and beyond those interactions and we currently have no plans for such a session. Your request will be considered by NRC senior management and we will inform you of any changes. However, as of now, our focus will be on considering the large number of public comments already provided. And we would note that the window to submit written comments on the Indian Point PSDAR will remain open until Oct. 22nd.

From: Guzman, Richard <Richard.Guzman@nrc.gov>
Sent: Tuesday, August 10, 2021 8:01 AM
To: Sheehan, Neil <Neil.Sheehan@nrc.gov>; Watson, Bruce <Bruce.Watson@nrc.gov>
Cc: Sturzebecher, Karl <Karl.Sturzebecher@nrc.gov>
Subject: RE: Re: Request for a public meeting

Bruce / Neil,

NRR/DORL suggests that we address Blanch's decommissioning related questions during the webinar – either in the presentation or during the comment gathering/Q&A period as the easiest path forward. We can then point him to the webinar transcript rather than take up additional time/resources for what he's requesting in a separate roundtable Q&A meeting w/the NRC. DORL also suggested to check w/HQ OPA on what was the intended meaning of "roundtable.." in the Mar 2021 policy statement.

-Rich

From: Guzman, Richard
Sent: Monday, August 09, 2021 5:23 PM
To: Sheehan, Neil <Neil.Sheehan@nrc.gov>
Cc: Watson, Bruce <Bruce.Watson@nrc.gov>; Sturzebecher, Karl <Karl.Sturzebecher@nrc.gov>
Subject: RE: Re: Request for a public meeting

Hi Neil – sorry for my late reply. Did you already respond to Blanch? I would agree with Bruce that he is misinterpreting the revised policy statement and that it was not intended to convey that members of the public may now request the NRC staff to arrange a round table Q&A. Did HQ OPA provide any language for these type of requests? I suppose he can send a formal request letter to the Commission requesting a meeting (as he's done before w/one of his 2.206s) and we can assess the need for one (or the Commission direct us to have a meeting, if warranted).

From: Sheehan, Neil <Neil.Sheehan@nrc.gov>
Sent: Friday, August 06, 2021 10:37 AM
To: Watson, Bruce <Bruce.Watson@nrc.gov>; Sturzebecher, Karl <Karl.Sturzebecher@nrc.gov>; Guzman, Richard <Richard.Guzman@nrc.gov>
Subject: Fwd: Re: Request for a public meeting

Thoughts?

From: "Paul Blanch" <pdblanch@comcast.net>
Subject: [External_Sender] Re: Request for a public meeting
Date: 06 August 2021 10:18
To: "Sheehan, Neil" <Neil.Sheehan@nrc.gov>
Cc: "Paul M. Blanch" <pdblanch@comcast.net>, (b)(6)

(b)(6)

(b)(6), "Richard
(b)(6) "Screnci, Diane"
<Diane.Screnci@nrc.gov>, "Burnell, Scott" <Scott.Burnell@nrc.gov>

Neil:

I may have missed your response. Please resend.

Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pdblanch@comcast.net
Cell 860-922-3119

On Jul 30, 2021, at 5:29 PM, Paul Blanch <pdblanch@comcast.net> wrote:

Neil:

I transmitted to you and also distributed to the NRC a presentation that contained my assumptions of the technical issues related to the Indian Point decommissioning and site remediation.

I also mentioned during my presentation the revised "Commission Policy Statement on Enhancing Participation in NRC Public Meetings" was published on March 19, 2021.

Please advise how a member of the public could make a request for a "round table or town meeting" type of public meeting as described in the Commission Policy (enclosed).

As you should have noted by a show of hands, most public members indicated endorsement of such a meeting however when I asked for a show of hands from NRC members present, not one NRC hand was raised in support of this Commission Policy.

Your prompt response, including the NRC's concurrence or my misunderstanding of site remediation will be appreciated.

<Untitled.pdf>

Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pdblanch@comcast.net
Cell 860-922-3119

From: Sheehan, Neil
Sent: Thursday, September 02, 2021 9:39 AM
To: Lorson, Raymond
Subject: FW: Responses to your questions re: Indian Point decommissioning

Ray,

As an FYI, I sent these responses to Mr. Blanch and have not received a response to date. Of course, he may be on vacation or tied up with something else.

Neil

From: Sheehan, Neil
Sent: Thursday, August 26, 2021 11:16 AM
To: Paul Blanch <pmb Blanch@comcast.net>
Subject: Responses to your questions re: Indian Point decommissioning

Paul,

Apologies for it taking a while to get back to you on these. Here are our responses to questions you asked of us in conjunction with the July 29th Indian Point PSDAR public meeting:

1. According to the Indian Point PSDAR, the entire site, with the exception of the ISFSI area, will be released for unrestricted use as defined by 10 CFR 20.1402. However, the surface dose rates may be reduced by state and local requirements and agreements.

NRC Response: States may establish unrestricted dose criteria that are less than the 25 millirems per year plus ALARA (As Low As Reasonably Achievable) requirement in 10 CFR 20. The unrestricted release criteria is not just a surface dose rate. The unrestricted release criteria follows the 25 mrem/y and ALARA principle. The release criteria is typically determined by the final residual activity based on site-specific dose modeling, using an all-pathways analysis. NUREG 1757 Volume 2 provides guidance for scenarios, dose modeling and methodologies acceptable to the NRC staff to determine the residual radioactivity concentrations used to determine the annual dose.

2. There is no discussion in the Indian Point PSDAR of release under restricted conditions as described in 10 CFR 20.1403 and appears to have been common practice at both Maine and Connecticut Yankee. I assume partial release is not an option. There are no present plans for restricted use release as defined in 10 CFR 20.1403.

NRC Response: On page 2 in the Introduction section of the PSDAR, Holtec states the intent is to release the site, with the exception of the Independent Spent Fuel Storage Installation (ISFSI) for unrestricted use. The term "unrestricted use" is used 12 more times in the PSDAR. Therefore, there is no discussion on restricted use per 10 CFR 20.1403.

3. Unrestricted use, as discussed by NEI and the NRC during the NRC workshop, will include the unrestricted residential use, industrial use, and possible power generation including potential new nuclear facilities.

NRC Response: Holtec, the company and landowner will determine the future use of the site and this will be provided in the license termination plan. As noted in an e-mail from staff to you dated July 24, 2021 on a similar question, the following response paraphrased below was provided:

[It is not known at this time.] what scenarios are being considered for Indian Point; however, as we discussed...unrestricted release means the licensee cannot take credit for any restrictions on land use. As I mentioned in the public workshop, NUREG-1757, *Volume 2*, Chapter 5 contains additional details on exposure scenarios. The licensee can use screening or bounding exposure scenarios such as the resident farmer scenario or more realistic, reasonably foreseeable future land use site-specific exposure scenarios. If they consider more realistic scenarios, they need to consider less likely but plausible exposure scenarios as well.

4. There are no present plans for engineered barriers to facilitate unrestricted release as discussed in NUREG 1757.

NRC Response: Engineering barriers are not used to facilitate unrestricted use. By definition, unrestricted means no restrictions. Engineered barriers are typically used only for restricted use. However, to date, no NRC-licensed facilities have chosen the restricted-use option.

5. The screening values or isotopic concentrations remaining at the site will be less than the values stated in NUREG 1757, Table H.2 "Screening Values (pCi/g) of Common Radionuclides." It is assumed that any soil containing radioactive concentrations in excess of these values will be removed prior to release for unrestricted use.

NRC Response: In the July 24 email response to your previous inquiry on a similar matter, NRC staff provided you with the following response:

With regard to screening values, NUREG-1757, *Volume 2*, Chapter 5 discusses use of screening values found in Appendix H of the same NUREG that can be used as long as the assumptions inherent in the modeling to derive screening values are met. Licensees also have the option to perform site-specific dose modeling to derive clean-up levels, which is also discussed in Chapter 5.

It is additionally noted that most complex sites develop site specific Derived Concentration Guideline Levels (DCGLs) as part of the license termination plan. The DCGLs are the levels by which the licensee demonstrates the site meets the unrestricted dose criteria.

Table H.2 Screening Values^a (pCi/g) of Common Radionuclides for Soil Surface Contamination Levels

Radionuclide	Symbol	Surface Soil Screening Values ^b
Hydrogen-3	³ H	110
Carbon-14	¹⁴ C	12
Sodium-22	²² Na	4.3
Sulfur-35	³⁵ S	270
Chlorine-36	³⁶ Cl	0.36
Calcium-45	⁴⁵ Ca	57
Scandium-46	⁴⁶ Sc	15
Manganese-54	⁵⁴ Mn	15
Iron-55	⁵⁵ Fe	10000
Cobalt-57	⁵⁷ Co	150
Cobalt-60	⁶⁰ Co	3.8
Nickel-59	⁵⁹ Ni	5500
Nickel-63	⁶³ Ni	2100
Strontium-90	⁹⁰ Sr	1.7
Niobium-94	⁹⁴ Nb	5.8
Technetium-99	⁹⁹ Tc	19
Iodine-129	¹²⁹ I	0.5
Cesium-134	¹³⁴ Cs	5.7
Cesium-137	¹³⁷ Cs	11
Europium-152	¹⁵² Eu	8.7
Europium-154	¹⁵⁴ Eu	8
Iridium-192	¹⁹² Ir	41
Lead-210	²¹⁰ Pb	0.9
Radium-226	²²⁶ Ra	0.7
Radium-226+C [*]	²²⁶ Ra+C	0.6
Actinium-227	²²⁷ Ac	0.5
Actinium-227+C	²²⁷ Ac+C	0.5
Thorium-228	²²⁸ Th	4.7

NUREG-1757, Vol. 2, Rev. 1

H-8

6. According to the PSDAR, "During demolition, above-ground structures will be removed to a nominal depth of three (3) feet below the surrounding grade level", however remaining concrete may contain highly contaminated piping with unspecified levels of radioactive contamination.

NRC Response: All residual components and surfaces must meet the DCGLs or otherwise be removed. Radioactive materials, including piping, will be decontaminated or will be removed that are above the DCGLs. It is industry practice for buildings to be demolished down to 3 feet or more based on applicable state requirements.

7. Radioactive surface and internal pipe contamination (no limits specified) will remain buried within the containing concrete structures. This will be consistent with the practices of Maine and Connecticut Yankee sites.

NRC Response: All radioactive components, including those below the surface, were removed from Maine Yankee and Connecticut Yankee. As noted in response #6, the site must meet the DCGL criteria approved in the license termination plan, which has not yet been submitted for Indian Point.

8. Twenty five years after shutdown of Maine and Connecticut Yankee, the sites have not been released for "unrestricted" use. This is in addition to the ISFSI portion of the site licensed under 10 CFR 72.

NRC Response: Both Maine Yankee and Connecticut Yankee land areas were released for unrestricted use except for the ISFSIs, which remain under NRC licenses.

9. "Rubbleization" as proposed at Maine Yankee will not be considered.

NRC Response: Rubblization can be used in many contexts. Maine Yankee decided to rubblize much of the site concrete to remove the rebar from the concrete and transport it offsite for disposal. Detailed plans for Indian Point should be addressed in the license termination plan.



Neil Sheehan
NRC Public Affairs Officer
Region I
(610) 337-5331
cell: (b)(6)

From: Suber, Gregory
Sent: Tue, 16 Nov 2021 12:51:27 +0000
To: Shoop, Undine; Wrona, David; Carusone, Caroline
Subject: Senator Gillibrand Briefing Strategy

Develop strategy to address concerns raised by Senator Gillibrand regarding Paul Blanch concerns.

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From: Shoop, Undine
Sent: Tue, 16 Nov 2021 21:44:48 +0000
To: Carusone, Caroline;Wrona, David;Russell, Andrea;Suber, Gregory;Evans, Jonathan
Cc: Buckberg, Perry;Pham, Bo
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

When Gregory and I discussed this last night, he recommended that Dave and Caroline return the call since they could be seen as neutral. But I also see Dave's point. Therefore I will call him back to understand his concerns and see if it is any aligned with his concerns expressed to his Senator's staffer.

From: Carusone, Caroline <caroline.carusone@nrc.gov>
Sent: Tuesday, November 16, 2021 11:14 AM
To: Wrona, David <David.Wrona@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>
Cc: Buckberg, Perry <Perry.Buckberg@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

Fair point.

From: Wrona, David <David.Wrona@nrc.gov>
Sent: Tuesday, November 16, 2021 9:30 AM
To: Carusone, Caroline <caroline.carusone@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>
Cc: Buckberg, Perry <Perry.Buckberg@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

I'm guessing that the content of his calls is that he doesn't see any changes based on his comments. I think he would find it frustrating to deal with new NRC staff, especially – at least based on my lack of knowledge of the history, not being able to help him see where we did or why we didn't accept his items. Just my 2 cents.

From: Carusone, Caroline <caroline.carusone@nrc.gov>
Sent: Tuesday, November 16, 2021 9:17 AM
To: Russell, Andrea <Andrea.Russell@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>
Cc: Wrona, David <David.Wrona@nrc.gov>; Buckberg, Perry <Perry.Buckberg@nrc.gov>; Pham, Bo <Bo.Pham@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

I'm just throwing this out there for consideration... and I'm hesitate to provide additional "escalation channels," but – would there be any benefit in either Dave Wrona or I reaching out to him? We would be "new" to this discussion and perhaps having someone that he perceives is

less biased might help? On the other hand, he might find it frustrating that there are new players. Thoughts?

From: Russell, Andrea <Andrea.Russell@nrc.gov>
Sent: Tuesday, November 16, 2021 9:02 AM
To: Suber, Gregory <Gregory.Suber@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>
Cc: Carusone, Caroline <caroline.carusone@nrc.gov>; Wrona, David <David.Wrona@nrc.gov>; Buckberg, Perry <Perry.Buckberg@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

So Jonathan got another call this morning. I truly think someone (Gregory or Undine?) needs to reach out to Paul sooner than later. As for the transcripts, I don't see how we could ask Perry to go through the transcripts since Perry wasn't part of the WG. I can go through the transcripts if needed.

From: Suber, Gregory <Gregory.Suber@nrc.gov>
Sent: Monday, November 15, 2021 5:46 PM
To: Evans, Jonathan <Jonathan.Evans@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>
Cc: Carusone, Caroline <caroline.carusone@nrc.gov>; Wrona, David <David.Wrona@nrc.gov>
Subject: RE: Voice Message From: WIRELESS CALLER, 8609223119

Jonathan,

I believe Undine or I should call Mr. Blanch. He has contacted Senator Gillibrand and we have a briefing with her staffers tentatively scheduled for December 2nd. I need someone – hopefully the current 2.206 PM – to extract Mr. Blanch's comments from the transcripts of our public meeting. He has informed the Senator that we were not responsive to his questions and comments.

I do not think you or Andrea should engage him since we have permanent staff work on 2.206. We should handle this within DORL.

Thanks,

From: Evans, Jonathan <Jonathan.Evans@nrc.gov>
Sent: Monday, November 15, 2021 5:07 PM
To: Suber, Gregory <Gregory.Suber@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>
Subject: Fwd: Voice Message From: WIRELESS CALLER, 8609223119

Hey all,

I am on travel right now. Are any of you able to respond to Paul?

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From: WIRELESS CALLER <tel=8609223119@officelinx.nrc.gov>

Sent: Monday, November 15, 2021 7:04:00 AM

To: Evans, Jonathan <Jonathan.Evans@nrc.gov>

Subject: Voice Message From: WIRELESS CALLER, 8609223119

From: [Burnell, Scott](#)
To: [Screnci, Diane](#)
Cc: [McIntyre, Dave](#)
Subject: RE: Re: your voicemails to the staff
Date: Wednesday, November 17, 2021 11:20:00 AM
Attachments: [image001.png](#)

My thinking is that he's chosen the FOIA process, so that takes precedence. If he still has questions after that, we'll cross that bridge then.

From: Screnci, Diane <Diane.Screnci@nrc.gov>
Sent: Wednesday, November 17, 2021 11:18 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>
Cc: McIntyre, Dave <David.McIntyre@nrc.gov>
Subject: RE: Re: your voicemails to the staff

Since we don't know what his questions are I don't think we can assume the FOIA response will have the answers. It might be the FOIA will have the answers, but we just don't know at this point. Since Undine already left a message for him. The ball's in his court.

I suggest that all calls are during work hours at our convenience.

***Diane Screnci** (she/her)
Sr. Public Affairs Officer
USNRC, Region I
610-337-5330*

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Wednesday, November 17, 2021 11:07 AM
To: Russell, Andrea <Andrea.Russell@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Cc: Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>
Subject: RE: Re: your voicemails to the staff

Does anyone else have input on the proposed reply? Thanks.

From: Russell, Andrea <Andrea.Russell@nrc.gov>
Sent: Wednesday, November 17, 2021 9:53 AM
To: Burnell, Scott <Scott.Burnell@nrc.gov>; Shoop, Undine <Undine.Shoop@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Cc: Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>
Subject: RE: Re: your voicemails to the staff

Sounds good to me.

From: Burnell, Scott <Scott.Burnell@nrc.gov>

Sent: Wednesday, November 17, 2021 9:51 AM

To: Shoop, Undine <Undine.Shoop@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>

Cc: Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>; McIntyre, Dave <David.McIntyre@nrc.gov>

Subject: FW: Re: your voicemails to the staff

Hello all;

Given he's submitted a FOIA on the public meetings for the 2.206 revision process, I plan to tell him our reply will come through that process.

I welcome your suggestions. Thanks.

Scott

From: Paul Blanch <pdblanch@comcast.net>

Sent: Wednesday, November 17, 2021 9:34 AM

To: Burnell, Scott <Scott.Burnell@nrc.gov>

Cc: Paul M. Blanch <pdblanch@comcast.net>; Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>; Charles Langley <langley@publicwatchdogs.org>

Subject: [External_Sender] Re: your voicemails to the staff

Scott:

This is a technical issue and there is no need to involve OPA. I think if you look at the transcript of the 2.206 meeting, you will see why I called

Is this a new unwritten NRC Policy that a member of the public can't talk about a formal meeting with the NRC's staff?

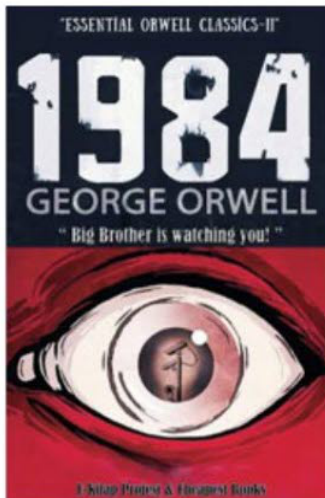
I am pursuing different routes seeking answers to my questions

My letter to the EDO was not related to the unreturned calls from the NRC Staff

Has OPA now directed the Staff not to talk to me?

I am well aware of how to contact OPA if I need its assistance

Apparently, OPA now screening all my calls as in "1984"?



Paul Blanch
135 Hyde Rd.
West Hartford, CT 06117
pmb Blanch@comcast.net
Cell 860-922-3119

On Nov 17, 2021, at 8:49 AM, Burnell, Scott <Scott.Burnell@nrc.gov> wrote:

Good morning, Paul;

I understand you've left voicemails for several staff in NRR, regarding the recent SECY on revisions to the 2.206 process. Given that you've also just emailed the EDO on matters related to your 2.206 on San Onofre spent fuel, we'd like to understand what about the SECY you wanted to discuss. Thank you.

Scott Burnell
Public Affairs Officer
Nuclear Regulatory Commission

From: [Shoop, Undine](#)
To: [Burnell, Scott](#); [Russell, Andrea](#); [Evans, Jonathan](#); [Suber, Gregory](#)
Cc: [McIntyre, Dave](#); [Screnci, Diane](#); [Sheehan, Neil](#)
Subject: RE: RE: your voicemails to the staff
Date: Wednesday, November 17, 2021 8:59:03 AM

Hi Scott,

This is consistent with what I said as well. I got his voice-mail so I told him I was returning his call and asked him to e-mail me so we could determine a mutually agreeable time to discuss his interests.

Thanks
U

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Wednesday, November 17, 2021 8:51 AM
To: Shoop, Undine <Undine.Shoop@nrc.gov>; Russell, Andrea <Andrea.Russell@nrc.gov>; Evans, Jonathan <Jonathan.Evans@nrc.gov>; Suber, Gregory <Gregory.Suber@nrc.gov>
Cc: McIntyre, Dave <David.McIntyre@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>
Subject: FW: RE: your voicemails to the staff

FYI

From: Burnell, Scott
Sent: Wednesday, November 17, 2021 8:50 AM
To: pmb Blanch@comcast.net
Cc: Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>
Subject: RE: your voicemails to the staff

Good morning, Paul;

I understand you've left voicemails for several staff in NRR, regarding the recent SECY on revisions to the 2.206 process. Given that you've also just emailed the EDO on matters related to your 2.206 on San Onofre spent fuel, we'd like to understand what about the SECY you wanted to discuss. Thank you.

Scott Burnell
Public Affairs Officer
Nuclear Regulatory Commission

From: [Dennis, Suzanne](#)
To: [Burnell, Scott](#)
Subject: RE: RE: your voicemails to the staff
Date: Wednesday, November 17, 2021 8:56:06 AM

Thanks!

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Wednesday, November 17, 2021 8:55 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: FW: RE: your voicemails to the staff

FYI, we'll see how he responds.

From: Burnell, Scott
Sent: Wednesday, November 17, 2021 8:50 AM
To: pmb Blanch@comcast.net
Cc: Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>
Subject: RE: your voicemails to the staff

Good morning, Paul;

I understand you've left voicemails for several staff in NRR, regarding the recent SECY on revisions to the 2.206 process. Given that you've also just emailed the EDO on matters related to your 2.206 on San Onofre spent fuel, we'd like to understand what about the SECY you wanted to discuss. Thank you.

Scott Burnell
Public Affairs Officer
Nuclear Regulatory Commission