

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.

	
<p>(View the this slide on page 4, at https://bit.ly/31pEUKD)</p>	<p>Statement at https://bit.ly/3cyr1YP, minute 1:10:52 of original recording.</p>

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.¹ 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

¹ Southern California Edison's representative for the SONGS Community Engagement Panel, Tom Palmisano, lied to the public at the [August 9, 2018 CEP Meeting](#). Mr. Palmisano stated that operations at the SONGS ISFSI were stopped to "give the crews a rest." This deception was exposed later when a [whistleblower revealed on video](#) that a canister was involved in what the NRC calls a "near-hit" accident that could have resulted in the 100,000 pound vessel free-falling nearly 18 feet inside a steel and concrete silo. This deceit has caused permanent public revulsion and distrust of the CEP, including condemnation by prominent community members and the former elected City Attorney for the City of San Diego ([get video](#))

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.²” 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 panels³ 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,



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² CEP Charter

³ Millstone 1, Connecticut Yankee, Maine Yankee, Vermont Yankee, Indian Point and Pilgrim

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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
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