

**Core Message to the NRC**  
**9/26/2013 NRC Decommission Meeting**

## **STOP the high burnup nuclear experiment.<sup>1</sup>**

- **HIGH BURNUP FUEL PROBLEMS:**
  - **Dangerously unpredictable in storage**
  - **Over twice as radioactive as low burnup waste**
  - **Hotter – high burnup fuel requires 7 to 20 years (instead of 5 years) in spent fuel pools<sup>2</sup>**
  - **Requires more storage space than low burnup fuel**
  - **No transport casks approved<sup>3</sup>**
- Dry casks for high burnup fuel are approved for only 20 years. There is no proof the fuel can be stored longer.<sup>4</sup>
- Assumptions about how high burnup fuel will react in the casks the first 20 years are proving incorrect.<sup>5</sup>
- No safe way to relocate the 1123 high burnup fuel assemblies at San Onofre to an interim or permanent waste storage location. They sit on Southern California's earthquake prone coast, risking the lives of current and future generations, our nation's food supply and our economy.
- The NRC should stop approving the use of high burnup fuel.



## **DENY Edison's request for unsafe dry casks.**

- Edison wants to lower safety standards by using a new dry cask system (NUHOMS® 32PTH2) that crowds 32 fuel assemblies into the same space that currently holds 24.<sup>6</sup> This would result in a higher risk of radiation releases, especially for high burnup fuel.<sup>7</sup>
- The NRC should NOT approve the NUHOMS® 32PTH2 cask system.

## **INCREASE NRC oversight of San Onofre decommissioning.**

- SoCal Edison's history of San Onofre mismanagement requires a high level of oversight.
- San Onofre has the worst safety complaint record and highest record of retaliation against employees reporting safety problems of all U.S. nuclear power plants.
- An independent Citizen Oversight Panel (COP) is needed to partner with the NRC in the decommissioning process – not a COP controlled by Edison.
  - **REVOKE approval of high burnup nuclear fuel.**
  - **REJECT requests for 32 fuel assembly casks.**
  - **RESIST nuclear industry pressure to lower safety standards.**
  - **REDUCE radiation risks for current and future generations.**

<sup>1</sup> High burnup fuel: burnup >45 gigawatt-days per metric ton of uranium (GWd/MTU); uses enriched uranium to burn longer in a reactor.

<sup>2</sup> CoC No. 1029 Technical Specifications for Advanced NUHOMS® System Operating Controls and Limits, Appendix A Tables 2-9 to 2-16 <http://pbadupws.nrc.gov/docs/ML0515/ML051520131.pdf>

<sup>3</sup> SFPO Interim Staff Guidance 11, Rev 3 Cladding Considerations for the Transportation and Storage of Spent Fuel 11/17/2003 <http://www.nrc.gov/reading-rm/doc-collections/isg/isg-11R3.pdf>

<sup>4</sup> NRC Robert E. Einziger, PhD: insufficient data to support licensing dry casks for >20 years, March 13, 2013. <http://1.usa.gov/15E8gX5>

<sup>5</sup> NWTRB Douglas B. Rigby, PhD: The NRC approved the initial 20 year dry cask storage based on assumptions. However, no information was found on inspections conducted on high burnup fuels to confirm the predictions that were made. U.S. Nuclear Waste Technical Review Board December 2010 report [http://www.nwtrb.gov/reports/eds\\_rpt.pdf](http://www.nwtrb.gov/reports/eds_rpt.pdf)

<sup>6</sup> Edison request for NUHOMS® 32PTH2 <http://pbadupws.nrc.gov/docs/ML1204/ML12046A013.pdf>

<sup>7</sup> RWMA Marvin Resnikoff, PhD: The Hazards of Generation III Reactor Fuel Wastes May 2010 <http://bit.ly/19dVRsY>

Additional sources and information on above issues: <http://sanonofresafety.org/nuclear-waste/>