FACTS in Response to SCE Responses to Surfrider Questions
From September 15, 2017

Southern California Edison's (SCE) has not included important facts in their responses to Surfrider questions. See "FACTS" below SCE's responses. References for facts at SanOnofreSafety.org.

<u>Timeline Inquiries & Comments</u> (Julia Chunn-Heer, San Diego Policy Manager)

1. **Has the timeline for starting the movement into dry storage changed, or is it still slated to start in Dec 2017/Jan 2018?**

   SCE Response: No, the timeline has not changed. Fuel transfer from wet to dry storage could start as early as December 2017 following on-site NRC reviews.

FACTS:

a. SCE's answer implies the Holtec 37-fuel assembly thin-wall canisters are safe. However, the NRC has approved a relatively new unproven design that they know cannot be adequately inspected, maintained, monitored or repaired to PREVENT radioactive leaks and that they know are vulnerable to short-term cracking. SCE has no approved plan in place to stop leaks or replace canisters.
   1) The NRC and SCE know there is no seismic/earthquake rating for partially cracked canisters, yet refuse to address this issue.
   2) The existing 51 Areva NUHOMS 24-fuel assembly thin-wall canisters are up to 15 years old. SCE has no idea how many cracks they have or how deep the cracks may be, yet SCE continues to use thin-wall canisters and the NRC continues to approve inferior thin-wall canister technology, knowing that once cracks starts they can grow through the wall in only 16 years.
   3) Calvert Cliffs Independent Spent Fuel Storage Installation (ISFSI) was approved for an additional 40 years. Their Aging Management Plan does not require adequate inspections to find cracks or resolve cracking problems. Calvert Cliffs thin-wall canisters are similar to San Onofre thin-wall canisters.
   4) SCE knows better quality dry storage systems are available that can be inspected, maintained, monitored and repaired (inside and out), but refused to require these minimum safety requirements in their Requests for Proposals and the NRC refuses to enforce minimum safety standards for containers they know need to be maintained for decades, if not centuries.
   5) The Electric Power Research Institute (EPRI) reported it would be over 80 years before San Onofre canisters would leak. However, their report cherry picked data to reach that conclusion. They ignored conditions of the San Onofre marine environment (frequent fog, on shore surf and wind) and evidence that a 2-year old Diablo Canyon canister (also located near the Pacific Ocean) had a low enough temperature for moisture to dissolve corrosive salts (also found at Diablo). Salt corrosion is one of the major triggers to initiate cracking of these canisters.
   6) The NRC claims we don't have enough moisture at San Onofre to trigger "chloride induced stress corrosion cracking" from salt. They ignore the fact we have frequent fog along the coast and ignore that other comparable components at San Onofre have cracked and leaked from moist salt air.
   7) The NRC and SCE are ignoring all the other conditions that can cause thin-wall canisters to start cracking, such as acid rain, and critters making microscopic scratches on the canister surface.

b. The NRC approved record high temperatures for the Holtec thin-wall canisters (almost double those previously allowed). Previous maximum canister heat load at San Onofre was 15.29 Kw, with an average much lower than that. SCE is loading the Holtec canisters at just under 30 Kw. This allows SCE to expedite fuel from the pools to dry storage. Expediting fuel into dry storage is a major cost savings to SCE. Maintaining the pools is a high overhead cost.
    1) NRC engineers said Holtec did not justify the high heat loads. They are concerned about damaging the fuel assemblies. However, NRC management approved this anyway, putting industry profits over our safety.
    2) The NRC is no longer requiring SCE to verify that the convection cooling system is performing adequately (for heat loads under 30Kw). This is a major change from previous canister approvals that required verification of adequate cooling after the canisters were loaded inside the concrete overpack. SCE is loading canisters at just under 30Kw. This allows SCE to avoid reporting effectiveness of the cooling system, since only canisters loaded at 30Kw or above must be reported.
    3) The NRC is approving hotter canisters because that is what the nuclear energy corporations want – not because they have assurances fuel will not become damaged. Spent fuel pools are filling up with higher burnup fuel and must be unloaded in order to keep reactors running. The only other option to build an additional spent fuel pool for the additional fuel, but that is very expensive. Therefore, the NRC is approving much higher heat loads, even above 30kW.
c. Since canisters are welded shut, they have no way to verify the condition of the fuel assemblies for storage or transport

2. According to the settlement agreement, there is a commitment to investigate a monitoring plan by 2020:

- **When will the monitoring plan be completed?**

  SCE Response: The Coastal Development Permit approved by the Coastal Commission in 2015 includes a condition requiring SCE to develop an Inspection & Maintenance (I&M) Program by October 2022. As part of the settlement agreement, SCE agreed to expedite preparation of that program by two years, to 2020.

  It is important to note, all dry cask storage facilities at U.S. nuclear plants are monitored once the system is in use. This activity is separate from the I&M Program discussed above. Routine monitoring includes:

  - 24/7 Monitoring by Highly Trained Operations and Security Force
  - Continuous Temperature Monitoring
  - Daily Walkdowns of ISFSI
  - Radiation Surveys
  - Periodic Inspections

  In addition, the NRC requires an Aging Management Plan (AMP) to be in place after the system has been licensed for 20 years.

- **When will the monitoring plan be implemented?**

  SCE Response: As noted in the prior question, routine monitoring of the UMAX system will commence immediately upon installation of the first canister, as required by the

NRC. This monitoring, which includes temperature surveillance and operator visual inspections, is consistent with the system technical specifications and final safety analysis report, and was not impacted by the settlement agreement.

- **To truly promote SCE's principles of "safety, stewardship, and engagement", we feel this plan should be fully developed before more spent fuel is moved into dry storage. Why not go above and beyond the bare minimum requirements of the NRC?**

  SCE Response: Under NRC regulations, the AMP is not required until 2035. Therefore, SCE has gone above and beyond NRC requirements by agreeing to develop an I&M Program by 2020, which will provide for more formal monitoring at an earlier stage. In addition, as mentioned earlier, routine monitoring of dry cask storage facilities is performed as soon as the fuel is moved into dry storage.

FACTS:

a. SCE avoided the real answer to the Surfrider excellent recommendation. SCE doesn't have the ability to adequately inspect, let alone the ability to repair, and likely will never have those capabilities with the thin-wall canister design. Their goal is to expedite the fuel out of the pools to save money. The only option to meet those conditions is to use thick-wall casks, but SCE refuses to do this.

b. The purpose of any monitoring plan is to prevent leaks or quickly stop leaks after they happen. Existing SCE "Routine monitoring" mentioned above does not meet either of those goals. The SCE Inspection & Maintenance (I&M) Program will not meet those goals, either.

c. The NRC, SCE and thin-wall canister vendors have not provided evidence that SCE's thin-wall Areva NUHOMS canisters and thin-wall Holtec canisters can be adequately inspected or repaired and there is sufficient evidence to show otherwise.

d. No thin-wall canisters loaded with spent nuclear fuel waste have been adequately inspected and none have been repaired.

e. Holtec President, Dr. Kris Singh, admitted at an SCE public CEP meeting that even if you could find a crack, even a microscopic through-wall crack will release millions of curies of radionuclides into the environment. And even if you could find the cracks and a way to repair them, it's not practical to repair them without introducing another condition for cracking. Tom Palmisano (SCE) disagrees with Singh, but has provided no evidence.

f. The Calvert Cliffs ISFSI has an approved NRC Aging Management Plan, but it is inadequate. It does not require adequate inspections to find or measure cracks and does not outline any method to repair or replace canisters. The renewal license states: *The licensee shall perform inspections of DSC [dry storage canister] external surfaces using proven* ***technology reasonably available at the time the inspection is conducted which is capable of meeting the physical access and environmental constraints of the HSM (concrete overpack) interior****."*

g. There is no technology available to meet those conditions and the nuclear industry has not proven it will ever exist. Information provided by EPRI and SCE regarding this is very misleading, giving the impression that it actually exists and can be used to adequate inspect to find cracks and measure depth of cracks.

h. The NRC only requires visual inspection of one canister at each site, so even if they did have inspection technology that could find and measure cracks, the NRC regulations are extremely weak.

i. The nuclear industry promises future solutions for finding and repairing cracks. Believing nuclear industry promises of waste solutions is what got us into this mess.

3. **Is SCE looking into other options for offsite storage since Palo Verde has said publicly they do not want San Onofre's waste**?

SCE Response: SCE is closely monitoring, in particular, the proposed consolidated interim storage facilities in West Texas and East New Mexico. SCE will be submitting a formal request to Palo Verde to store the San Onofre used nuclear fuel.

FACTS:

a. HR3053 proposed interim storage legislation has major flaws, making this a non-viable, unsafe and underfunded option.
b. The proposed CIS facilities in Texas and New Mexico are flawed designs, proposing to transport existing aging canisters by rail, with no plan to deal with leaking or cracking canisters. SCE only wants to consider options that remove their financial liability.
c. SCE, the NRC, DOE and the owners of the proposed CIS sites have not evaluated transport routes. SCE fuel would likely need to go by rail through Los Angeles.
d. Transport risk are significant and there is no plan to effectively handle accidents.
e. The NRC is still studying whether high burnup fuel (like that at San Onofre) will become damaged from train vibrations.
f. Moving existing thin-wall canisters that have been aging for decades may not make it across the freeway, let alone on a longer route. No one knows the conditions of the canisters or the fuel rods.
g. NRC transport regulations require intact canisters for transporting high burnup fuel. Contents must be inspected to ensure fuel is not damaged. The thin-wall canisters are not designed to be opened.
h. The citizens at the proposed sites do not want San Onofre (or any other) nuclear waste. Lawsuits will put a halt or at least slow down the process. Thin-wall canisters will likely start leaking before another site can be found. That is why the most important thing to do is move the fuel to thick-wall transportable storage casks that can be inspected, maintained, repaired and monitored to prevent radioactive leaks.
i. Fuel will go critical if exposed to unborated water. The NRC ignores this by claiming it will never happen.
j. High burnup fuel generates hydrides, that if exposed to air can cause hydrogen explosions. The NRC has not addressed this and just assumes it will never happen.
k. Palo Verde doesn't want our fuel assemblies. Since SCE will still have liability, they do not want that option. Tom Palmisano said this in an email.

4. **We ask SCE to please provide our communities with more certainty that canisters will remain intact and safe, prior to burying nuclear waste so close to the ocean, on a dynamic coastline and bluff face, exposed to impacts from sea level rise.**

We urge SCE to continually and thoroughly monitor all canisters onsite due to the significant risks if a leak were to occur, and the amount of unknowns and unintended consequences that could arise.

SCE Response: Used nuclear fuel has been safely stored in dry storage facilities for more than

three decades in the United States. The canisters are licensed by the NRC. In addition, state regulatory review was performed to ensure the dry storage facility complies with the California Coastal Act. The California Coastal Commission found that the project would be consistent with the hazards, marine resources, water quality and view protection policies of the Coastal Act. These federal and state regulatory processes included a thorough evaluation of radiological and environmental concerns, and provide confidence that the fuel can be safely stored at San Onofre.

Even in the unlikely event that a leak were to occur, this would not give rise to significant risks or consequences. There would be minimal to no impact to the site or public, where the following is anticipated:

- Inert helium release
- Any fission gases that did escape would diffuse into the air, and have minimal to no impact to the public
- No high-pressure forces in canister to cause a release
- Solid fission products would remain in fuel rods in canister

To address potential flaws, SCE is working with vendors/industry to develop mitigation techniques. Techniques under development include:

1. Remote weld repair
2. Canister-in-canister encapsulation
3. Transport cask to store/contain compromised canister

Safety is our core principle. SCE has and will continue to monitor the dry cask systems and safeguard the used nuclear fuel until government approved long-term storage options are available in order to protect the people and environment surrounding San Onofre.

FACTS

a. SCE has no idea how safe the existing canisters are. Most canisters are around 10 years old. A few are over 30 years old. Since they cannot inspect for cracks they have no idea the condition of the canisters. However, we are increasing our probability of leaks as the years increase. No one can predict when a crack will start. The NRC only knows they are vulnerable to cracking. Once a crack starts it can grow through the wall in 16 years.
b. Areva (the NUHOMS canister vendor) is asking the NRC to weaken their dry storage safety requirements – at SCE's request.
    1) Eliminate the spent fuel pools after all fuel is move to dry storage (eliminating the only on-site method to replace canisters).
    2) Exclude reporting radiation levels at the outlet air vents. This is where the highest radiation levels will from through wall cracks. It appears SCE's plan is to hide leaks rather that stop them. (When the steam generators leaked radiation 1/31/2012, we were not told until 2/17/2012 that the radionuclides were released into the atmosphere. SCE initially claimed the radiation was contained in the domes.) How can we trust a company that already attempted to hide leaks?
c. The Coastal Commission added Special Conditions to the Coastal Permit, requiring the canisters be maintainable and transportable. This is hardly an endorsement. The Commission knows of the flaws of these canisters. That is the reason for the special conditions.

d. The Coastal Commission and other state and local agencies have no jurisdiction over radiological impact, so their approval is not an endorsement of radiological risk.
e. The NRC assumption of nothing can go wrong in dry storage is based on false assumptions, as outlined in the Sierra Club Comments to the NRC on Decommissioning, March 2016. *https://www.nrc.gov/docs/ML1608/ML16082A004.pdf*
f. Claims of minor leaks are not based on evidence with high burnup fuels.
g. Would you buy a car that could not be inspected, repaired, maintained and had no warning system that helped prevent problems? Would you buy a car that the vendor promised to add all these features at some time in the future, with unknown solutions? Would you take your family on a trip in this car? Well, SCE and the NRC are "taking us for a ride" in this car. It's up to us to stop them.
h. There are no long-term storage options in the wings. SCE knows that. We know that. SCE doesn't even have a short-term safe storage plan and the NRC should be renamed the Nuclear Rubberstamp Commission.
i. SCE has the worst safety complaint record in the nation from their own employees. And the highest rate of retaliating against their employees for reporting safety problems. Their priority is short-term profits at our expense.
j. It's time to educate others, including elected officials about how they are being mislead by these nuclear energy entities. It would help if we were all on the same page with a united message and mobilizing our volunteers and others in this effort – before it's too late.

<u>Canister Integrity Inquiries</u> (Katie Day, Staff Scientist at Surfrider Headquarters)

5. **The UMAX Safety Evaluation Report was designed for an underground system (hence the U in UMAX). Since SONGS is planning on using a partially buried approach to account for the water table's proximity:**

   - **Do these safety assurances apply?**

     SCE Response: Yes, since the SONGS system is not fully underground, an additional analysis was conducted for the UMAX system based on the SONGS configuration using the berm design.

   - **Is there an approved updated safety evaluation report specific to the model and design used at SONGS?**

     SCE Response: Yes, the dry storage system at SONGS is approved by the NRC for storage (as well as transportation). An NRC approved cask is one that has undergone a technical review of its safety aspects and been found to be adequate to store used fuel at a site that has been evaluated by the licensee to meet all of the NRC's requirements in 10 CFR Part 72.

FACTS:

a. Where is the updated safety evaluation report that addresses the configuration at San Onofre? It appears SCE is stating they have approval for the site and are being allows to use it without an updated Safety Evaluation Report.
b. The NRC knows that system is too close to the ocean and half buried in soggy water.
c. The NRC knows the ground and air contain corrosive elements and significant moisture – all enemies of metal and concrete.
d. They do not require enclosing these system in a building for additional environmental or security protection.

e. If the NRC approved the nuclear power plant at that site, why would anyone think they wouldn't also approve the nuclear waste at this site. The NRC employee nickname for the NRC is "Nobody Really Cares".
f. The NRC knows the below ground concrete system cannot adequately be inspected, but approved it anyway.

6. The "CEC is meant to further resist corrosion" yet Holtec and SCE have noted that vents could allow rainwater to enter the CEC. They have been designed to capture that water between the CEC and the sealed canister to prevent that water from escaping into the natural environment:

a. **Since rain in coastal environments has a higher salt content, how can you be so positive that corrosion will not be exacerbated?**

SCE Response: The stainless steel material (Type 316L) used in the SONGS dry cask storage system is resistant to corrosion and degradation. Currently there are over 2,000 stainless steel canisters loaded with used fuel in the U.S. – some in marine environments similar to San Onofre, such as Calvert Cliffs Nuclear Power Plant, located on the shores of the Chesapeake Bay, Maryland. Calvert Cliffs has stainless steel canisters that have been in service for over 20 years. See "SONGS Used Fuel Management – Defense in Depth Report, September 8, 2017"

Regarding rain water, as described in the Final Safety Analysis Report, the HI-STORM UMAX is designed to direct storm water and snow/ice melt-off away from the Cavity Enclosure Container (CEC) Flange and the Closure Lid where the air passages are located. Additionally, storm water intrusion tests found no water collected inside the module. In the unlikely event that rainwater enters the inlet vents, it would remain within the space between the CEC and the divider shell and therefore have little potential contact with the Multi-Purpose Canister (MPC) (what you refer to as the "sealed canister") which contains the used nuclear fuel. If the CEC experiences any degradation, a local repair would be performed and would not affect the overall integrity of the ISFSI.

b. How will water be removed and handled when canisters get moved or transferred offsite?

SCE Response: If water is detected within the CEC, it would be pumped out.

c. Since the CEC has vents, does that mean that there is only one completely sealed barrier between HLRW and the environment, workers, and nearby communities?

SCE Response: There are two barriers between the used fuel pellets and the outside environment: the zirconium fuel-pin cladding and the stainless steel MPC. Uranium fuel pellets are placed within zirconium tubes during manufacturing, which are sealed shut, and the Uranium and all of the fission products created during operation remain within the sealed tubes during normal operation and thereafter. In the UMAX dry storage system, the assemblies of fuel pins ("fuel assemblies") are placed inside the 5/8" thick stainless steel MPC.

FACTS:

a. The NRC material engineers and other material engineers state 304/304L and 316/316L stainless steel are all susceptible to chloride induced stress corrosion cracking. SCE knows this.
b. Fog, rain and debris can enter the air vents and sit at the bottom of the Holtec hole. The only method to remove this is to pump it out.
c. SCE isn't even required to inspect the holes unless the air vent temperature is elevated. In the past with other systems, air vents were required to be checked every 24 hours. And above ground systems have drains.
d. Humboldt Bay has a below ground Holtec system with no air vents. Fuel was already cool enough and no high burnup fuel existed. Holtec promised there would never be water leaks into the below ground holes. However, water leaked in.
e. Now is not the time to take SCE, Holtec or NRC promises without proof. They do not have the proof for this unproven system.
f. The Vermont Yankee nuclear power company refused to use the Holtec below ground system, stating it was too expensive, too complicated and unproven.
g. There is also a concern that the vent pipe that is open near the bottom could become blocked, which would stop the cooling system.

7. Edison has mentioned that it is possible to transport a cracked canister because Hi-STAR transport casks do not take credit for internal canisters:

a. How would a cracked canister be placed in the transport cask without causing exposure to staff and the surrounding environment?

SCE Response: We first want to clarify that your initial statement may misunderstand SCE's prior comments on transporting casks. SCE has been asked if it's possible to transport a cracked SONGS canister. We've responded by saying, it is possible, but with conditions**.** Some transport casks may accept a canister with defects, and others may require modification or additional evaluation. These types of transport may require additional license evaluation at the time of shipment. Additional evaluation will need to be done should a cracked canister in the US be identified. No leaks have been identified in the 2000 welded steel canisters in the U.S.

Understanding that these discussions are hypothetical, the cracking of concern would be microscopic in nature. Some relatively benign fission product gases may be released initially through microscopic cracks; the particulate will be retained within the canister. Microscopic cracking will not result in a tangible decrease in shielding effectiveness and does not impact canister integrity for transportation or dose to workers. Also note that the transportation cask provides the majority of radiation shielding during handling and transportation.

b. The plan of moving a cracked canister into a larger intact canister as a safety precaution sounds great, except again, how would a cracked canister get transferred without exposing staff and the environment to radioactive gases?

SCE Response: See response above.

FACTS:

a. SCE is finally admitting here that there are additional requirements other than just an approved transport cask. Partially cracked canisters (let alone leaking ones) are not approved by NRC transport regulations. The fuel assemblies also need to be confirmed as intact.
b. The high burnup Holtec transport cask is not approved for unloading. The NRC, SCE and others have not addressed unloading. They don't have a plan for a canister that arrives leaking or with significant cracks that could affect the ability to unload the canister.
c. The oldest dry storage systems are thick-wall casks. They do not have the cracking issues or the inability to inspect them. Most thin-wall canisters are too new to leak. However, SCE and all the others have no idea how many cracks they have or how deep the cracks are. Just because they are claiming no leaks so far, doesn't meet they know when they will start leaking. They are just hoping they don't leak, because they have no plan in place, if they do.
d. Their report claiming minor impacts did not address high burnup fuel or criticality from water intrusion.
e. The NRC has not approved a container to store leaking canisters, let alone one to transport leaking canisters. They have no NRC approved safety evaluation of this scenario or how they would relocate a leaking canister.
f. Lots of promises. No evidence.

8. If a crack, or initial pitting is identified during routine monitoring, will Edison notify the public?

SCE Response: As with all issues important to the public, SCE intends to keep the public updated, such as through the Community Engagement Panel.

FACTS:

a. SCE has no method to find cracks or pits in their routine monitoring. That explains the vague answer.
b. SCE only need to examine one canister per site.
c. SCE has no plan even if they could find cracks.

9. Is there an NDE in development that would not require moving a canister?

SCE Response: Yes. For example, see the eddy current array inspection probe described in EPRI's September 14, 2017, CEP presentation. In general, the industry's goal is to employ in-situ NDE equipment.

FACTS:

a. Eddy current is useful for measuring cracks, but not finding them.
b. The methods being investigated will not be adequate to find all cracks. The best option for finding cracks is with a fluid dye. This method cannot be used in canisters loaded with fuel assemblies.
c. The question after inspection is, "what will they do if they find cracks?". Without that answer, nothing else matters. They do not have that answer. Only promises of future solutions.

d. The fact SCE plans to destroy empty pools, shows their intention of assuming they do not need to ever repair canisters or find cracks. They likely will just try to hide the leaks and hope the canisters don't go critical or explode.

<u>Settlement Inquiries</u> (Denise Erkeneff, South Orange County Chapter Manager)

- **What is the significance of the settlement agreement in the decommissioning process?**

  SCE Response: The Settlement Agreement does not directly pertain to the decommissioning process. The Settlement Agreement specifically addresses SCE's onsite ISFSIs and steps SCE will take to assess the feasibility of relocating SONGS spent fuel to an offsite storage facility. In exchange for SCE's commitments made as part of the Settlement, Plaintiffs dismissed their legal challenge. This allows for SCE to complete the ISFSI and to transfer all spent fuel to dry storage pending the availability of an offsite storage facility. The timely transfer of fuel to dry storage will help ensure that SCE can promptly proceed with decommissioning the facility.

  Please see attached Settlement Agreement and Press Release/Settlement Agreement summary.

  ## FACTS:

  a. Another excuse for expediting fuel out of the pools. "…help ensure that SCE can promptly proceed with decommissioning the facility". Does this mean destroy the pools? Yes.
  b. The Settlement Agreement doesn't change anything. SCE only has to do what is "commercially viable" and they are in charge of the entire process, so nothing has changed. They paid attorneys to drop the lawsuit.

- **How has the settlement agreement made SCE change their plans and operating procedures for the SONGS waste storage issue?**

  SCE Response: SCE's plans for offloading spent fuel to the ISFSI have not changed. In addition, SCE's operating procedures are in accordance with NRC requirements and those are not impacted by the Settlement Agreement. In terms of SCE's long-term plans, the Settlement Agreement requires SCE to use commercially reasonable efforts to relocate the spent fuel to an offsite storage facility. In furtherance of that objective, the settlement identifies specific steps SCE will take, including the following:

  - Maintain an "Experts Team" to advise SCE on any proposed relocation of spent fuel;
  - Develop a conceptual plan for the offsite transportation of spent fuel;
  - Develop a strategic plan to support the development of a commercially reasonable offsite storage facility;
  - Make a formal, written request to the owners of Palo Verde regarding the development of an expanded ISFSI to store spent fuel

  These commitments could result in the transfer of fuel offsite in a shorter timeframe than SCE originally contemplated. SCE's plans anticipated that SONGS spent fuel would be transferred to a government-owned federal repository, which would result in fuel remaining onsite until 2049. In fulfilling its settlement commitments, SCE may be successful in improving this schedule. Pending availability of an offsite storage facility, SCE will continue to safely store the spent fuel in the onsite ISFSIs.

FACTS:

a. SCE picks the experts and makes the plan. Nothing new here.
b. They know Palo Verde doesn't want our waste, so this is just a formality.
c. SCE will continue to unsafely store the waste unless we find a way to stop them or one or more canisters explodes or goes critical.
d. SCE's own witness at the California Public Utilities Commission (CPUC) admitted the 2049 date for a permanent repository is "unlikely", yet SCE has made no other plans.
e. SCE's plan to the NRC, CPUC and the Coastal Commission assumes nothing will go wrong.

- **Are there any updates on the timeline for securing offsite transport?**

SCE Response: No, not at this time. SCE is diligently working to satisfy its commitments under the Settlement Agreement, which includes the development of a conceptual transportation plan.

FACTS:

a. What does a "conceptual transportation plan mean? A transportation plan to where? Who pays for the rail and road upgrades?
b. First responders are state and local agencies. In the case of a radioactive release, the FEMA instruction say, if the radiation levels are unsafe, get the heck out of there and don't let anyone near it. That's it. No other plan after that.
c. SCE has no authority to move waste anywhere. It's the receiver that has the authority and no one wants it.
d. The Governor of New Mexico wrote a letter to the DOE stating she would have no problem taking the waste if one of her communities wanted it, **since it is safely stored**. It's not safely and others in her state do not want it and will fight any attempts to move it there.
e. The DOE handout on their tour to discuss consent-based siting, claims the waste is safety stored. At the time they wrote this they did not know about the cracking issue. However, they know now and have not corrected this brochure.

- **Will monthly progress reports, those SCE is required to provide to plaintiffs, be publicly available?**

SCE Response: Yes. SCE plans to make these reports available through the Community Engagement Panel.

FACTS:

I'm sure these SCE reports will be just as helpful and informative as the rest of SCE's information.