

**DRAFT**

California Coastal Commission  
Chair Dayna Bochco  
45 Fremont Street  
San Francisco, CA 94105

April 18, 2017

Dear Chair Bochco,

The City of San Clemente respectfully requests the Coastal Commission to reconsider its decision to issue a spent nuclear fuel storage permit to Southern California Edison (SCE) at San Onofre Nuclear Power Station (SONGS). Our request is driven by deep concern for our citizen's safety.

We see several problems with the Coastal Commission's Independent Spent Fuel Storage Installation (ISFSA) permit.

1. The permit allows SCE to bury 75 canisters of spent nuclear fuel in concrete bunkers, on the rationale undergrounding will protect them from seismic events. However, immediately adjacent to the buried canisters are 51 spent fuel canisters stored above ground. Why are those remaining above ground not vulnerable to seismic risks?
2. Once the canisters are buried there is an unacceptable risk they will not be moved for decades. The approved ISFSA permit causes our city to involuntarily become a host community for spent waste, contrary to the intentions of the 2012 Blue Ribbon Commission recommendations on consent-based storage.
3. Further, there is no apparent monitoring system in place to make sure the buried containers retain structural integrity. The canisters are also not designed for transport should a permanent repository become available.
4. An ocean-side location for 3.6 million pounds of spent fuel is convenient for SCE but an untenable environmental and safety choice. The I-5 freeway carries over 147,000 vehicles per day and runs within the exclusion zone. LOSSAN (LA-San Diego & San Luis Obispo) Rail Corridor is a key passenger train route and the only viable freight rail link to the rest of the nation.
5. Unlike Diablo Canyon, SONGS is not required to maintain emergency services throughout decommissioning. This is unacceptable given the questionable geology of the permitted interim storage site.

We ask you to reconsider the granting of the ISFSA permit, and instead require Southern California Edison to find another location for interim storage.

Please step forward and meet your responsibilities to the residents of San Clemente as well as the visitors who count on you to maintain high standards for California beaches.

Sincerely,

Kathy Ward, Mayor

cc :

California Coastal Commissioners

John Ainsworth, California Coastal Commission Executive Director

U.S. Senators Dianne Feinstein and Kamala Harris

U.S. Representative Darrell Issa

Senator Pat Bates

Assemblymember Bill Brough

Mayors: Oceanside, Laguna Beach, San Juan Capistrano, Dana Point, Fallbrook

Concerned Coastal Communities Coalition