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Governor Edmund G. Brown Jr.  
Office of the Governor  
State Capitol, Suite 1173  
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Dear Governor Brown,

Nearly a year ago I wrote a letter to you voicing my concerns about the San Onofre Nuclear Generating Station (SONGS), and to humbly ask you to use the power of your office to investigate the plant's ongoing declining performance and equipment conditions. During this past year the facility's declining performance issues have been lost in the shadow of the much bigger problem with premature tube degradation in the recently installed Replacement Steam Generators, and concerns about the plant's future operation.

My husband, James Chambers, is a Nuclear Regulatory Commission (NRC) Licensed Nuclear Reactor Operator for San Onofre Units 2 and 3. He worked at SONGS from 1983 until 2010 when he left his job on medical leave because of work induced health problems. In 2010, my husband came under retaliation by Southern California Edison (SCE) for raising safety concerns and filing allegations of serious violations at the plant with the NRC. When my husband's medical leave was abruptly terminated, SCE no longer had a job for him; so the company offered him a separation agreement with the stipulation that he not publically disclose any information which might be harmful to SCE or its subsidiaries. SCE is a public utility; the fact that they use their abundant financial resources to actively silence potential critics is a practice which I believe should concern you and all of the members of our state legislature.

It is my firm belief that there are multiple levels of corruption within SCE, the California Public Utilities Commission, and the Interjurisdictional Planning Committee which needs to be rooted out and exposed. Without complete transparency by our public utilities, and the agencies which oversee them; honest public debate about performance, equipment, and environmental issues pertaining to SONGS cannot occur

and places the health and safety of the public in jeopardy. Without honesty and transparency, we run the risk of having a significant nuclear event comparable to Chernobyl or Fukushima in southern California. As I am sure you are well aware of, if there were ever a significant radiological release to the atmosphere at SONGS the area surrounding the plant could become uninhabitable for several decades or longer. It is no small task to clean up radioactive contamination from the environment. This is a serious topic which could impact the future of California.

Currently, SONGS Units 2 and 3 are both shut down because of tube failure and premature tube wear in the Replacement Steam Generators, and the situation is being investigated by the NRC. Last October, SCE proposed a plan to run Unit 2 at only 70% plant power, claiming that this change would eliminate the conditions which led to the Steam Generator Tube Rupture in Unit 3, and premature wear in both Units' Steam Generators. However, a reduction in plant power, which is the measurement relating to how many megawatts the Turbine Generator produces, can never eliminate the threats to a Steam Generator Tube Rupture condition as SCE is claiming it will. SONGS Unit 2 is a Pressurized Water Reactor, and the conditions that have caused the failure of the Steam Generators are the normal operating pressure of the Reactor, and the flow rate of water into the Steam Generators. These are fixed pressures and flows that cannot be changed; therefore, any attempt to run the plant will result in exactly the same conditions which caused the premature tube wear and tube ruptures in the first year of service of the Replacement Steam Generators. Please bear in mind that the new metal alloy that was used and the tube failures that resulted from the first year of service was equivalent to 20-30 years of service in other plants using the original metal alloy. SCE, contrary to the NRC's request for complete transparency, has implied that operating the plant at a reduced power level will reduce the threat of further Steam Generator tube ruptures and subsequent radioactive release to the environment, when in fact, the threat can never be removed because of the design of the plant and the weak alloy which the Replacement Steam Generators are constructed of.

I also believe that SCE's proposed plan is irresponsible, and shows a serious lack of conservative decision making principles. "Conservative decision making" is a nuclear fundamental that means the safest decisions should always be made to protect the health and safety of the general public, the plant workers, and the environment. If the NRC approves SCE's plan, workers in the Operations Department will be required to start up and run the reactor knowing that the Replacement Steam Generators have extensive design problems and significant wear which could lead to another tube rupture and radioactive release to the environment. As the wife of a reactor operator, I lived through many refueling outages and unit start-ups throughout the 1990's and early 2000's; and I believe that I have a comprehensive understanding of the level of

stress that reactor operators experience during normal work conditions. The fact that SCE wants its workers to operate defective equipment shows the flagrant disregard that SCE and SONGS senior management has for the health and safety of nuclear workers at the plant, as well as the people living in the surrounding communities.

According to the findings of the Institute of Nuclear Power Operations (INPO), San Onofre has been the worst rated nuclear plant in the nation. And according to the World Association of Nuclear Operators (WANO), San Onofre has been the worst or near worst rated nuclear plant in the nation for industrial safety. And according to the NRC, San Onofre has had the longest running cross cutting issues in Human Performance in the history of U. S. nuclear power. "Cross cutting issues in Human Performance" means that in nearly every department significant errors are being made because workers do not follow required procedural steps. The length and breadth of these issues were so egregious it forced the NRC to revise their procedures because San Onofre was actually outside of all postulated conditions set forth in the NRC procedures governing Human Performance failures. This is very condemning evidence which shows that SONGS has been mismanaged for many years. How much more evidence do we need before an adjudicated public hearing is held to investigate the matter?

The design problems and the conditions which led to the first Steam Generator tube failure in Unit 3 have already been investigated and a root cause analysis has been performed by several industry experts. These analyses confirm that future Steam Generator tube wear and tube ruptures with a resultant radioactive release to the environment are inevitable. Why does SCE need to do a 5 month experimental test run with Unit 2; just to see if the conclusions of the root cause analyses are correct? At what point in time did we decide that doing an experiment with a full scale commercial nuclear reactor was a good idea? What SCE is proposing is unprecedented in the history of U.S. nuclear power. It was an equipment test experiment which led to the nuclear event at Chernobyl in 1986. Didn't we learn anything from that tragedy?

Public distrust, and nuclear worker distrust of SCE's management of SONGS has been growing significantly over the past year, and I believe it has reached a boiling point. The electric ratepayers of southern California do not believe they should be held financially responsible for SCE's engineering mistakes in the design of the Replacement Steam Generators, or for the cost of running a shutdown nuclear facility which has not produced a single megawatt in over a year. As Governor of the state, I believe you have a responsibility to take action on this matter and not leave it to the sole discretion of the Nuclear Regulatory Commission to decide the fate and future of the San Onofre Nuclear Generating Station. The NRC's biggest flaw is that they are neither omnipresent nor omniscient; and they cannot regulate the nuclear power industry as everyone assumes they do. In 2010, when my husband filed serious allegations regarding blatant

procedural violations and retaliation against himself for raising safety concerns at the plant, he conveyed to me his experience that after all was said and done the NRC would never actually do anything; and nothing has changed in three years.

I would greatly appreciate a response to this letter. I did not receive a response a year ago when I wrote to your office the first time expressing my concerns about SONGS. Thank you for your time and your dedication to keeping California free from preventable nuclear accidents. In conclusion let me say; the only thing necessary for a nuclear disaster to occur in California is for a good Governor to do nothing.

Sincerely,

Mrs. Bethann Chambers