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April 28, 2000

PG&E Letter DCL-00-066

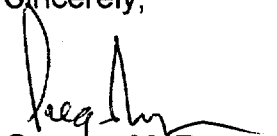
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Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
1999 Annual Nonradiological Environmental Operating Report

Dear Commissioners and Staff:

Enclosed is the 1999 Annual Nonradiological Environmental Operating Report for Diablo Canyon Power Plant, Units 1 and 2, submitted in accordance with Subsection 5.4.1 of the Environmental Protection Plan, Appendix B, of the Facility Operating Licenses DPR-80 and DPR-82.

Sincerely,



Gregory M. Rueger

cc: Curt Batson  
Steven D. Bloom  
Roger W. Briggs  
Ellis W. Merschoff  
David L. Proulx  
Diablo Distribution

Enclosures

TLH/RWL/3007

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**1999 ANNUAL NONRADIOLOGICAL ENVIRONMENTAL  
OPERATING REPORT  
DIABLO CANYON POWER PLANT**

Pacific Gas And Electric Company  
April 2000

## 1. Introduction

PG&E prepared the 1999 Annual Nonradiological Environmental Operating Report (AEOR) in accordance with the Environmental Protection Plan (EPP), Appendix B, of Facility Operating Licenses DPR-80 and DPR-82, for Diablo Canyon Power Plant (DCPP), Units 1 and 2. The report describes EPP implementation and shows that the plant operates in an environmentally acceptable manner. PG&E remains committed to minimizing the environmental impact of operating DCPP.

## 2. Environmental Monitoring

### 2.1. Aquatic Issues

Aquatic issues are addressed by the effluent limitations and receiving water monitoring/reporting requirements contained in the National Pollutant Discharge Elimination System (NPDES) permit issued to DCPP. The permit includes applicable requirements of the State Water Resources Control Board's Ocean Plan and Thermal Plan. In accordance with section 3.2 of the EPP, copies of specific reports to the Central Coast Regional Water Quality Control Board (CCRWQCB) are also required to be submitted to the NRC. All such reports were provided.

#### 2.1.1. Routine Influent and Effluent Monitoring

DCPP submitted quarterly NPDES reports to the CCRWQCB by the 20th day of the month following the end of each quarter. The reports contained routine influent and effluent monitoring data and permit compliance summaries. DCPP submitted an annual NPDES report to the CCRWQCB on February 25, 2000 (PG&E Letter DCL-2000-510). The report contained monitoring data summaries in tabular and graphical form, and a summary of permit compliance and corrective actions for 1999.

#### 2.1.2. Receiving Water Monitoring Program

The NPDES Receiving Water Monitoring Program (RWMP), required by the CCRWQCB, included the ecological monitoring, temperature measurements, and State Mussel Watch activities.

Environmental monitoring programs have recorded biological changes in the discharge area since plant startup. These programs monitor intertidal and subtidal communities of invertebrates, algae, and fish in the discharge cove and at stations north and south of DCPP. During the first quarter of 1999, environmental monitoring continued under the Ecological Monitoring Program (EMP). At the beginning of the second

quarter, tasks under the EMP were modified (increased stations and increased sampling frequency) and combined with Mussel Watch and temperature measurements to form the revised RWMP.

DCCP submitted two comprehensive analysis reports (listed below) to the CCRWQCB during 1999. Future status reports will be submitted to the CCRWQCB annually.

"Receiving Water Monitoring Program - 1995-1997 Progress Report"  
(PG&E Letter No. DCL-99-508, January 29, 1999)

"Receiving Water Monitoring Program - 1995-1998 Progress Report"  
(PG&E Letter No. DCL-99-545, June 30, 1999)

### 2.1.3. Thermal Effects Study

DCCP submitted the final thermal effects comprehensive assessment report to the CCRWQCB and the NRC in December of 1997 (Chapter 1) and November of 1998 (Chapter 2). Throughout 1999, discussions were held with the CCRWQCB regarding these reports.

In November 1999, the Regional Board considered various enforcement options including consideration of a proposed Cease and Desist Order (CDO) alleging that DCCPs discharge was not in compliance with several provisions of its NPDES permit. These allegations were based on the data contained in Chapter 1 of the comprehensive thermal effects assessment. If issued, the CDO would require PG&E to submit a report proposing physical or operational changes to bring the plant into compliance or a report proposing an alternative means of achieving compliance. PG&E strongly believes that the plant is in full compliance with its permit. Discussions with the Regional Board to resolve this matter are on-going.

### 2.1.4. 316(b) Studies

316(b) field sampling continued through June 1999. A draft report on target species, "Preliminary Assessment of Entrainment Effects on Target Fish and Crab Taxa - (July 1, 1997 - June 30, 1998)" was submitted December 10, 1999 (PG&E Letter No. DCL-99-588).

## 2.2. Terrestrial Issues

### 2.2.1. Herbicide Application and Fire Control

DCCP follows applicable Environmental Protection Agency and State of California requirements for purchase and application of herbicides. Herbicide application was consistent with that of past years. During 1999, wild lands fuel management methods within the Diablo Creek watershed included primary and secondary treatments. These methods were targeted at approximately 400 acres in the lower watershed immediately east of the 500 kV switchyard and within a fire sensitive area where several transmission lines converge.

Primary treatments were applied to mature stands of vegetation and include:

Hand clearing and burning: Since 1991, crews have been using hand tools and chain saws to cut vegetation to ground level. The vegetation collected from the hand clearing crews, was laid in windrows and burned. In 1999, 20 acres of brush was cleared.

Mechanical mulcher: The mechanical mulcher was used around the outside perimeter of the 500 kV yard (approximately 8 acres).

Secondary treatments, designed to control resprouting vegetation, include:

Livestock: From Spring through Fall, 500 goats browsed 10 areas that totaled approximately 195 acres of vegetation.

Chemical treatments: Herbicide application within the plant site vicinity was performed by The Weed Works (California State License 02055-00000) as described in Attachment 1.

### 2.2.2. Preservation of Archaeological Resources

#### CA-SLO-2 Site Management

Work is tracked and approved within the boundaries of CA-SLO-2 using the "Archeological Resources Management Plan (ARMP)."

In mid February, DCCP contacted the PG&E archaeologist about replacing insulators on the 230 kV pole within CA-SLO-2. Cleaning insulators on this pole did not require monitoring by the archaeologist in the past because there was no previous impact to

SLO-2. The crews were given a tailboard discussion on awareness and used the designated dirt path to the pole.

PG&E's Grid Maintenance and Transmission Supervisor was informed in February that monitoring would not be necessary for the replacement project if his crew was given a tailboard on the sensitivity of SLO-2 and reminded of the requirement to stay with established areas. Visits to this area by the PG&E archaeologist after the work was completed revealed no damage to the site.

On April 30, DCPD contacted the PG&E archaeologist about a damaged chain-link fence along the western boundary of the SLO-2 site. The fence was built during DCPD construction and later collapsed because of coastal bluff erosion. Erosion, which had occurred at the end of the paved road to this area, was also discussed.

Approximately four years ago, coastal bluff erosion damaged a small portion of a road berm and fence. At the time, a new section of road berm was installed. The new berm channels road water away and effectively deters further erosion. Coastal bluff erosion is a natural effect of the ocean side environment. Chumash representatives are aware of the general erosion of SLO-2 and accept it as a part of the natural progression of the earth and ocean. While complete fence removal was considered, it appeared that it could cause more damage than if it were left to collapse on its own.

In October, the PG&E archaeologist reviewed the 23 SLO-2 photo-monitoring stations. Monitoring was in accordance with the Building and Land Service Department's, "Cultural Resources Management Procedures for Archaeological Site CA-SLO-2," which implements policies of the ARMP. No new areas of erosion or impacts to SLO-2 were noted.

An area along a cut bank of the access road through SLO-2, first noted during the 1993 and 1994 photo monitoring visits, continues to be stable.

#### Chumash Indian Correspondence

There was no communication between PG&E and the Northern Chumash Indians regarding this site.

### 3. Unusual or Important Environmental Events (EPP 4.1)

No unusual or important events occurred that would indicate, or could result in, a significant environmental impact causally related to station operations.

### 4. Plant Consistency Requirements

#### 4.1. Design Changes

The Plant Staff Review Committee (PSRC) determined no design, test, or procedure changes involved an unreviewed environmental question. One design change was determined to have the potential to affect the environment. A summary of the environmental evaluation is presented below:

Design Change Notice (DCN)-04950331 involved the replacement of the Unit 2 Main Bank Transformers. The old transformers and the replacements contain a large quantity of oil. However, the replacements contain less oil than the old transformers. Therefore, this change did not add new environmental hazards. Existing oil spill measures provide adequate controls to minimize the risk of an oil release to the ocean.

### 5. Plant Reporting Requirements

#### 5.1. EPP Noncompliance

A letter proposing changes to the RWMP was submitted to the CCRWQCB on January 8, 1999. Due to an administrative oversight, the copy to the NRC was sent January 22, 1999, rather than concurrently.

#### 5.2. Changes In Station Design

The PSRC determined that no changes in plant design, tests, or experiments involved an unreviewed environmental question or change to the EPP.

#### 5.3. Nonroutine Reports

DCPP made two nonroutine reports regarding environmental events to the National Marine Fisheries Service. Copies of these reports were sent to the NRC concurrently.

Both of these events involved green sea turtles which were found disoriented between the curtain wall and the bar racks of intake structure. Green sea turtles are protected by the Endangered Species Act of 1973. In each event, the turtle was lifted by crane, transported to a PG&E research vessel, and released approximately 0.5 miles outside of the intake cove. In each event,



the turtle appeared to be unharmed. The events occurred on May 30 and August 24, 1999.

#### 5.4. 1999 NPDES Report Summary

DCPP reported one potential release incident to the CCRWQCB in accordance with the NPDES permit. The report identified that the oil and grease limit at an intermittent discharge point may have been exceeded. When it was determined that there may have been a minor release of oily residue, no additional flow was available from the discharge point to confirm a release. There were no identified adverse environmental effects. DCPP initiated actions to prevent recurrence and included an incident summary in the fourth quarter NPDES report (copied to the NRC).

#### 6. EPP Audit

The PG&E Nuclear Quality Services Department decreased the frequency of EPP audits from annually to biennially. The last audit of EPP implementing activities was performed from January 12 through February 12, 1999. This audit was conducted in accordance with EPP, Section 5.1. Results indicated the plant met the requirements of the EPP and associated documents.

### Herbicide Treatments During 1999

Date	Location	Product*	Total Applied
1/3/99	Roadside - main access road	Karmex Oust Roundup	4 lb. 6 oz. 2 gal.
1/17/99	Roadside - main access road	Krovar Oust Roundup	6 lb. 6 oz. 2.5 gal.
1/18/99	Storage by dog kennels	Krovar Karmex	6 lb. 4 lb..
1/18/99	Triangle by 500 kV Switchyard	Krovar	3 lb.
1/18/99	Container storage by ponds	Krovar Oust	6 lb. 6 oz.
1/27/99	Storage behind warehouse	Krovar Oust	3 lb.. 3 oz..
2/14/99	Sewage Treatment Plant, Heliport, ditch south of Administrative Bldg.	Krovar Oust Roundup	3 lb. 3 oz. 1 gal.
2/28/99	Parking lot west of Soil Lab	Krovar Roundup	3 lb. 1 gal..
3/07/99	Roadsides to Administration Bldg. and Parking Lot #2	Roundup	1.5 gal.
3/13/99	Pecho Coast Trail	Roundup	48 oz.
4/04/99	Protected Area	Krovar Oust Roundup	6 lb. 6 oz. 2 gal.
4/15/99	Green Mountain and Radio Tower Road	Krovar Oust Roundup	6 lb. 6 oz. 2 gal..
4/17/99	Dog runs	Roundup	2 gal.
4/17/99	Bank south of Lot #1, Paint Area and Lot #7	Krovar Oust Roundup	3 lb. 3 oz. 1 gal.
4/24/99	Roadside - main access road	Roundup	1.5 gal.
6/26 & 28/99	Outside perimeter of 500 kV Yard	Stalker Garlon 3A Garlon 4 Hasten	6 qt. 6 qt. 6 qt. 18 qt.
11/20/99	Roadsides	Karmex Oust	8 lb. 6 oz.
11/22/99	500 kV Yard	Krovar Spike	27 lb. 9 lb.
11/26/99	Roadsides around 500 kV Yard	Krovar Spike	3 lb. 1 lb..
11/26/99	Storage east of 230 kV	Krovar Spike	3 lb. 1 lb.

**Herbicide Manufacturer Data**

Herbicide	Manufacturer	EPA#	Rate Of Application
Garlon 3A	Dow Elanco	62719-40	1 qt/acre
Garlon 4	Dow Elanco	62719-37	1 qt/acre
Hasten	Wilbur-Ellis	2935-50160	3 qt/acre
Oust	DuPont	352-401	3 oz/acre
Krovar	DuPont	352-505	4 lb/acre
Karmex	DuPont	352-247	1 1/2 lb/acre
Roundup	Monsanto	524-445	As specified on label
Spike	DowElanco	62719-107	1 1/2 lb/acre
Stalker	American Cyanimid	241-296	1 qt/acre

**Herbicide Application Totals**

Herbicide	Total Applied
Garlon 3A	6 qt.
Garlon 4	6 qt.
Hasten	18 qt.
Karmex	16 lb.
Krovar	83 lb.
Oust	51 oz.
Roundup	15.3 gal
Spike	11 lb.
Stalker	6 qt.

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Document: PG&E Letter DCL-00-066

Commitment #1

Statement of Commitment: Future status reports will be submitted to the CCRWQCB annually.

Clarification: "Receiving Water Monitoring Program and  
"Receiving Water Monitoring Program -)

<i>Tracking Document:</i>	AR or NCR Environmental Database	AE or ACT
<i>Assigned To:</i>	NAME Bob Lorenz	ORGANIZATION CODE
<i>Commitment Type:</i>		
<i>Outage Commitment?</i>		
<i>PCD Commitment?</i>		
<i>Duplicate of New NCR Commitment in PCD?</i>		
<i>Old PCD Commitment being changed?</i>		1.