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June 24, 2003

PG&E Letter DIL-03-009

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Docket No. 72-26  
Diablo Canyon Independent Spent Fuel Storage Installation  
Submission of Survey Report - Presence of Morro Shoulderband Snail at ISFSI  
Material Disposal Sites

Dear Commissioners and Staff:

By letter dated December 21, 2001 (DIL-01-002), Pacific Gas and Electric Company (PG&E) submitted an application to the Nuclear Regulatory Commission (NRC) requesting a site-specific license for an Independent Spent Fuel Storage Installation (ISFSI) at the Diablo Canyon Power Plant (DCPP). The application included a Safety Analysis Report, Environmental Report, and other required documents in accordance with 10 CFR 72.

At the request of the NRC staff, a follow-up special status species survey of the proposed project site including all proposed disposal sites was recently performed to further evaluate the presence, or potential presence, of the federally endangered Morro shoulderband snail (MSS). No live MSS or MSS shells were found anywhere within the proposed project site, suggesting that MSS is not present here. Furthermore, the follow-up survey concluded, as did the earlier survey work performed at the site, that habitat suitability for the MSS within the project area is low. A copy of the survey report is enclosed for use by the NRC staff in their evaluation of the PG&E ISFSI license application.

If you have any questions regarding this report, please contact Mr. Terence Grebel at (805) 545-4160.

Sincerely,

Lawrence F. Womack

NMSSO1

Enclosure

cc: Diablo Distribution  
Thomas D. Green, Esq.  
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Christopher Helenius  
Sheldon L. Trubatch

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20 May 2003

Ms. Pat Kelly  
Pacific Gas and Electric  
P.O. Box 56  
Avila Beach, CA 93424

Re: *Special status species survey of DCPD ISFSI cut material disposal sites*

Dear Ms. Kelly,

TENERA Environmental has recently completed a special status species survey of the proposed ISFSI cut material disposal sites at the Diablo Canyon Power Plant (DCPP) (Figure 1). The objective of the survey was to evaluate the proposed disposal sites for the presence, or potential presence, of the federally endangered Morro shoulderband snail (*Helminthoglypta walkeriana*).

The Morro shoulderband snail (MSS) is a native terrestrial gastropod found only in western San Luis Obispo County. The U.S. Fish and Wildlife Service listed the species as endangered on December 15, 1994 (USFWS 1994) and designated critical habitat on February 7, 2001 (USFWS 2001). The range of the MSS is reported to include areas south of Morro Bay, west of Los Osos Creek, and north of Hazard Canyon. The species (*H. walkeriana* var. *morroensis*) has also been reported as occurring "near" the City of San Luis Obispo. Two other native Helminthoglyptid snails, the closely related surf shoulderband snail (*Helminthoglypta fieldi*) and the Big Sur shoulderband snail (*Helminthoglypta umbilicata*), also occur in San Luis Obispo County. The ranges of *H. umbilicata* and *H. walkeriana* (including var. *morroensis*) overlap and the two species are known to co-occur at several locations.

The MSS is typically associated with habitat consisting of sandy soils that support coastal dune, coastal scrub, and maritime chaparral communities (USFWS 2001). Within these natural communities the MSS is most often found within accumulations of leaf litter and coarse woody material within dense, low-growing vegetation that has considerable contact with the ground. MSS populations (var. *morroensis*) occurring at inland locations have been found in a variety of soil types including soils derived from serpentine parent material. These soil types support grassland habitat as well as scrub and chaparral communities. In grassland areas snails are often found beneath boulders and around the base of rock outcrops. Plant species that the MSS is often associated with include mock heather (*Ericameria ericoides*), buckwheat (*Eriogonum parvifolium*), eriastrum

(*Eriastrum densifolium*), chamisso lupine (*Lupinus chamissonis*), dudleya (*Dudleya* sp.), deerweed (*Lotus scoparius*), California sage (*Artemisia californica*), coyote brush (*Baccharis pilularis*), and black sage (*Salvia mellifera*). The MSS also utilizes microhabitat provided by introduced plant species such as ice plant/hotentot fig (*Mesembryanthemum* spp.) fig-marigold (*Carpobrotus* sp.), pampass grass (*Cortaderia* sp.), rockrose (*Cistus* sp.) and Indian fig cactus (*Opuntia ficus-indica*).

Dr. Tom Richards (#FWS-VFO-7) of California Polytechnic State University, San Luis Obispo, and Tenera biologists Dan Dugan (TE 067992-0) and Barbic Dugan (TE 067990-0) conducted surveys of the four disposal sites on May 15 and May 19, 2003. The surveys were conducted following U.S. Fish and Wildlife Service (USFWS) guidelines, however, did not constitute a full protocol level survey, which requires a minimum of five surveys to be conducted during or immediately after rain events. Surveys consisted of a thorough canvassing of each site and visual searches of vegetation and objects that might provide suitable microhabitat for MSS. These areas generally included the grass, soil, and leaf litter around the base of scrub vegetation, fences, boulders, rock outcrops, logs, bark, and also areas beneath wood/plastic/metal debris. Objects that were not embedded were carefully turned to inspect the area beneath. All objects that were turned were subsequently returned to their original position/orientation.

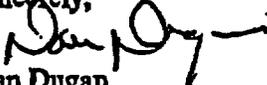
No live Morro shoulderband snails or MSS shells were found at any of the proposed disposal sites. Populations of live *Helminthoglypta umbilicata*, as well as an abundance of *H. umbilicata* shells were found at Disposal Site 1 (tri-bar storage) and Disposal Site 3. While fewer than 10 live *H. umbilicata* were found at Disposal Site 3, hundreds (or possibly thousands) of individuals were encountered at Disposal Site 1. The surveyors considered the observed abundance of *H. umbilicata* at Disposal Site 1 unusual. Persistent moisture beneath the tri-bars, in the drainage swale, and on the terraced slope was likely to contribute to the success (and abundance) of the species at the site. Several *H. umbilicata* shells, but no live snails, were also found at the proposed storage pad area. No shells or live snails of any species were found at Disposal Site 2.

The survey results suggest that *H. walkeriana* is not present at any of the proposed ISFSI cut material disposal sites or the storage pad area. It should be noted that the proposed disposal sites are located approximately five miles south of the described range of *H. walkeriana* and the species has not been documented south of Montana de Oro State Park. Suitable vegetation/habitat for *H. walkeriana* var. *morroensis* was observed in the vicinity of each of the disposal areas, however, no shells or live specimens were found. *H. umbilicata* shells were found at three of the four disposal sites and live *H. umbilicata* were found at two of the sites. The two Helminthoglyptid snail species (*H. umbilicata* and *H. walkeriana*) are known to co-occur at sites throughout the described range of *H. walkeriana* and one might expect both species to occupy the same habitat on the DCPD property. While the survey was not a USFWS protocol-level effort, the abundance of

shells and live snails encountered suggests that if *H. walkeriana* were present, some evidence of its presence would have likely been found.

If you have any questions please feel free to contact me.

Sincerely,

  
Dan Dugan  
Senior Biologist  
TENERA Environmental  
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### Literature Cited

USFWS, U.S. Fish and Wildlife Service, 1994. Endangered and threatened wildlife and plants; Endangered and threatened status for five plants and the Morro Shoulderband Snail from western San Luis Obispo County, California. Federal Register, Vol. 59:240, 64613-64623.

USFWS, U.S. Fish and Wildlife Service, 2001. Endangered and threatened wildlife and plants; Final determination of Critical Habitat for the Morro Shoulderband Snail (*Helminthoglypta walkeriana*). Federal Register, Vol. 66:26, 9233-9246.

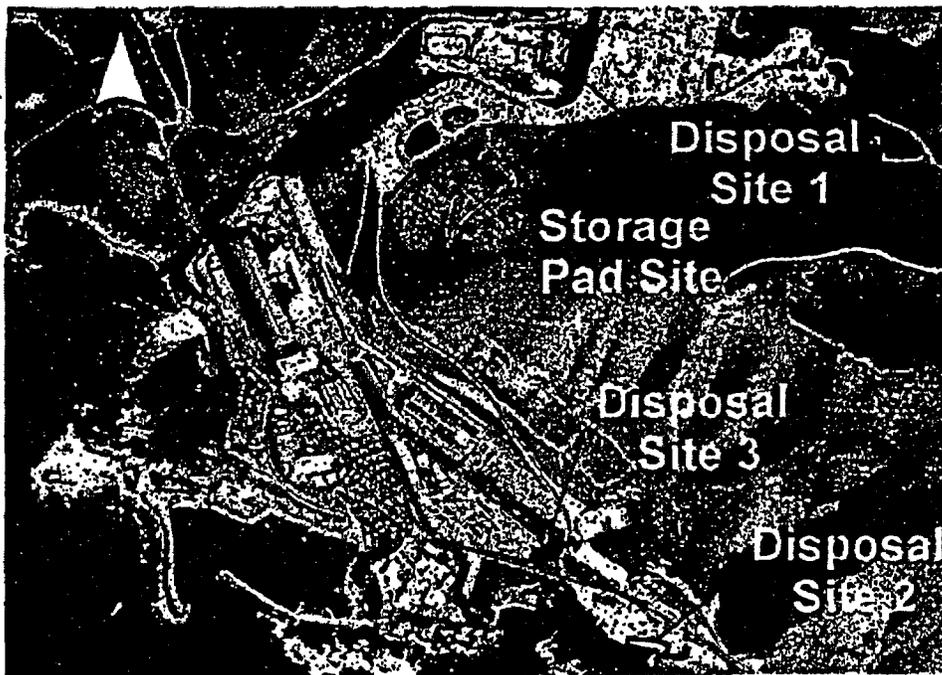


Figure 1. Aerial view of location of proposed ISFSI sites.