



**Pacific Gas and  
Electric Company®**

**James R. Becker**  
Vice President  
Diablo Canyon Operations and  
Station Director

Diablo Canyon Power Plant  
P. O. Box 56  
Avila Beach, CA 93424

805.545.3462  
Fax: 805.545.4234

April 29, 2005

PG&E Letter DCL-05-045

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

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Power Plant, Units 1 and 2  
2004 Annual Nonradiological Environmental Operating Report

Dear Commissioners and Staff:

Enclosed is the 2004 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,

James R. Becker

ddm/jlk/3007/R0258808

Enclosure

cc/enc: Roger W. Briggs  
Bruce S. Mallett  
David L. Proulx  
Girija S. Shukla  
Diablo Distribution

JE25



Document Control Desk  
April 29, 2005  
Page 2

PG&E Letter DCL 05-045

bcc: A. Glenn Caruso  
Bryan Cunningham  
Kathy Jones  
Richard F. Locke  
Arlene Versaw

Enclosure  
PG&E Letter DCL 05-045

**2004 ANNUAL NONRADIOLOGICAL ENVIRONMENTAL  
OPERATING REPORT  
DIABLO CANYON POWER PLANT, UNITS 1 AND 2**

Pacific Gas And Electric Company  
April 2005

## 1. Introduction

PG&E has prepared the 2004 Annual Nonradiological Environmental Operating Report 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 implementation of the EPP per the routine reporting requirements of EPP Subsection 5.4.1. 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 DCPP National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit includes applicable requirements of the State Water Resources Control Board's Ocean Plan and Thermal Plan.

#### 2.1.1. Routine Influent and Effluent Monitoring

During 2004, DCPP submitted quarterly NPDES reports containing routine influent and effluent monitoring data and permit compliance summaries to the Central Coast Regional Water Quality Control Board (CCRWQCB) during the month following the end of each quarter. DCPP also submitted an annual NPDES report to the CCRWQCB in February 2005. The annual report contained monitoring data summaries in tabular and graphical form, and a summary of permit compliance and corrective actions for 2004. Copies of the quarterly and annual reports were submitted concurrently to the Nuclear Regulatory Commission (NRC).

#### 2.1.2. Receiving Water Monitoring Program

The NPDES Receiving Water Monitoring Program, 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 start-up. 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 2004, environmental monitoring continued under the revised Receiving Water Monitoring Program (RWMP). The revised RWMP continued historical monitoring tasks, including temperature monitoring, State Mussel Watch activities, and intertidal and subtidal surveys (with additional stations and increased sampling frequencies).

The NPDES permit remains under administrative extension. In 2000, DCPD reached a tentative agreement with CCRWQCB staff, which addresses current and future impacts on receiving waters from power plant effluent discharge. This agreement, and the revised NPDES permit renewal application, did not receive the expected approvals from the CCRWQCB in July 2003, and discussions are continuing with CCRWQCB staff and their consultants. Based on the tentative agreement, future receiving water monitoring requirements will be significantly reduced or eliminated upon approval of the revised NPDES permit. Effluent monitoring will continue under the revised NPDES Permit.

DCPD submitted the "Receiving Water Monitoring Program – 2003 Annual Report" (PG&E No. DCL-2004-539) to the CCRWQCB and the NRC on April 30, 2004.

#### 2.1.3. Thermal Effects Study

DCPD submitted the final thermal effects comprehensive assessment report to the CCRWQCB and the NRC in 1998.

#### 2.1.4. 316(b) Studies

DCPD submitted the final 316(b) report, entitled "316(b) Demonstration Report" (PG&E No. DCL-2000-514) to the CCRWQCB and the NRC on March 1, 2000.

### 2.2. Terrestrial Issues

#### 2.2.1. Herbicide Application and Erosion Control

PG&E continues to implement erosion control activities at the plant site and in the transmission line corridors as part of an overall land management program. These erosion control activities consist of routine maintenance and prevention efforts performed periodically on an as-needed basis, including seasonal storm damage repair and wildfire damage repair.

Herbicides are used as one component of an overall land management program that includes transmission line corridors and rights-of-way. The company continues to use only EPA and/or state-approved herbicides and applies them in accordance with all applicable regulations.

## 2.2.2. Preservation of Archaeological Resources

### A. CA-SLO-2 Site Management

All work performed within the boundaries of CA-SLO-2 is tracked and approved per plant procedure EV1.ID2.

In October 2004, the PG&E archaeologist reviewed the 23 CA-SLO-2 photo-monitoring stations. The photo monitoring was conducted 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 Archaeological Resource Management Plan. No new areas of erosion or impacts to CA-SLO-2 were noted.

The DCP staff contacted the PG&E archaeologist regarding the replacement of security barriers through CA-SLO-2. The original security barriers were placed along the existing roads within the CA-SLO-2 site boundaries in 2003. The new larger barriers were placed in the same location as the old barriers. A tailboard concerning the sensitivity of CA-SLO-2 and the importance of staying on the existing road preceded the startup of work. The work was monitored on several occasions by the PG&E archaeologist. No impacts to CA-SLO-2 occurred during this project.

### B. Chumash Indian Correspondence

There was no communication between PG&E and the Northern Chumash Indians during 2004 concerning CA-SLO-2.

## 3. Unusual or Important Environmental Events

No unusual or important events that would indicate, or could result in, a significant environmental impact causally related to station operations occurred in 2004.

#### **4. Plant Reporting Requirements**

##### **4.1. EPP Noncompliance**

There were no EPP noncompliances during 2004.

##### **4.2. Changes In Station Design**

There were no changes in plant design or operation, tests, or experiments that involved an unreviewed environmental question or a change to the EPP.

##### **4.3. Nonroutine Reports**

There were no nonroutine events during 2004 per the EPP and, therefore, no nonroutine reports were submitted to the NRC.