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A. Stuxvenberg (ALS3)
N. Ferrer (nbj)

Comments on the
U.S. NUCLEAR REGULATORY COMMISSION'S ENVIRONMENTAL SCOPING FOR
DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION REVIEW

March 3, 2010

Barbara Byron
Senior Nuclear Policy Advisor
California Energy Commission

Good afternoon/evening. My name is Barbara Byron. I am the Senior Nuclear Policy Advisor with the California Energy Commission. We appreciate the opportunity to provide comments here today regarding the scope of the environmental review for the Diablo Canyon Nuclear Power Plant license extension application. My comments will be brief, since we plan to submit written comments later this month.

In November 2008, as required by California statutes Assembly Bill 1632, the California Energy Commission completed a comprehensive assessment of the Diablo Canyon and San Onofre Nuclear Power Plants. This assessment included studies of the seismic hazards at the Diablo Canyon and San Onofre sites and the seismic vulnerabilities of these plants. We found through this assessment that important data on Diablo Canyon's seismic hazard and vulnerabilities are incomplete or outdated. In addition, just prior to the completion of this assessment, PG&E announced the discovery of the Shoreline Fault less than half a mile offshore from Diablo Canyon. As a result, the Energy Commission recommended that PG&E conduct a number of additional seismic hazard and plant vulnerability analyses. The California Public Utilities Commission (CPUC) also directed PG&E in 2009 to report on the major findings and conclusions from these studies as part of its license renewal feasibility studies for Diablo Canyon.

These important studies include:

- Updated seismic/tsunami hazard studies, including using three-dimensional geophysical seismic reflection mapping and other advanced techniques to explore fault zones near Diablo Canyon;
- Assessments of the long-term seismic vulnerability and reliability of the plant, focusing on switchyards and other non safety-related components;
- An evaluation of additional pre-planning or mitigation steps that the utility could take to minimize plant outage times following a major seismic event, such as the earthquake that struck the Kashiwazaki-Kariwa plant in 2007; and
- An evaluation of the adequacy of access roads to Diablo Canyon and surrounding roadways for allowing emergency personnel to reach the plants and local communities and plant workers to evacuate.

PG&E's completion of these seismic studies is particularly important in light of the nearly 3-year outage of the Kashiwazaki-Kariwa nuclear power plant following the 2007 earthquake in Japan and the recently discovered Shoreline Fault near Diablo Canyon.

The Energy Commission and the CPUC have also identified a number of other studies that are needed in order to determine the economic, environmental, and reliability implications of relicensing Diablo Canyon. These studies would answer the following questions:

1. What would be the local economic impacts of continuing to operate the nuclear plant, and how would these impacts compare with potential alternate uses of the Diablo Canyon site?
2. What would be the low-level nuclear waste disposal costs for waste generated through a 20-year plant license extension, including the low-level waste disposal costs for any major capital projects that might be required during this period? In addition, what are PG&E's plans and estimated costs for the storage and disposal of low-level waste and spent fuel from the plant's operation and decommissioning?
3. What alternate power generation options could be used in place of power from Diablo Canyon? What would be the reliability, economic, and environmental impacts of these options compared to the impacts of Diablo Canyon?
4. What mitigation plans may be needed to ensure the integrity of the Diablo Canyon reactor pressure vessel over a 20-year license extension in light of any updates to the estimated seismic hazard at the site?
5. What are the options and costs for complying with California's once-through cooling policy?

The seismic studies and these additional studies are all needed to assess the cost and benefit to the state of continuing to operate Diablo Canyon for an additional 20 years. In addition, some of these same studies are also relevant to the NRC's evaluation of the environmental and safety implications of continuing to operate the plant. For example, an updated seismic hazard assessment is needed to assess the vulnerability of aging plant components to an earthquake. This is especially important for those reactor components, such as the reactor pressure vessel, that have been embrittled by neutron bombardment. In addition, the environmental assessment should consider possible changes to Diablo Canyon's cooling system resulting from the State's emerging once-through cooling regulations, required by provisions of the U.S. Clean Water Act, and updated assessments of site evacuation plans.

We, therefore, request that the NRC evaluate the safety and environmental implications of all of the AB 1632 recommended studies and issues identified by the CPUC and the Energy Commission and require that these seismic studies and the other state-mandated studies be reviewed as part of the Diablo Canyon's license renewal review proceeding before the Atomic Safety and Licensing Board.