



**Pacific Gas and
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PG&E Letter DCL-11-051

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
2010 Annual Nonradiological Environmental Operating Report

Dear Commissioners and Staff:

Enclosed is the 2010 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.

Pacific Gas and Electric Company makes no new regulatory commitments in this letter.

If you have any questions regarding this submittal, please contact James L. Kelly at (805) 545-3194.

Sincerely,

James R. Becker

swh/64037109

Enclosure

cc/enc: Roger W. Briggs, Executive Officer, CRWQCB
Elmo E. Collins, Regional Administrator, NRC Region IV
Michael S. Peck, NRC Senior Resident
James T. Polickoski, NRR Project Manager
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Diablo Distribution

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Enclosure
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**2010 ANNUAL NONRADIOLOGICAL ENVIRONMENTAL
OPERATING REPORT
DIABLO CANYON POWER PLANT, UNITS 1 AND 2**

Pacific Gas & Electric Company
April 2011

1. Introduction

PG&E has prepared the 2010 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 California State Water Resources Control Board's Ocean Plan and Thermal Plan.

2.1.1. Routine Influent and Effluent Monitoring

During 2010, 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. Beginning in July 2010, DCPP began submitting these reports indirectly to the CCRWQCB electronically via the California Integrated Water Quality System (CIWQS), an internet database application. DCPP also submitted an annual NPDES report to the CCRWQCB in February 2011 via the CIWQS application. The annual report contained monitoring data summaries in tabular and graphical form, and a summary of permit compliance and corrective actions for 2010. 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 2010, 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 – 2009 Annual Report" (PG&E Letter No. DCL-2010-523) to the CCRWQCB and the NRC on April 20, 2010. The 2010 Receiving Water Monitoring Annual Report will be submitted in late April 2011.

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 Letter 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

Herbicides are used as one component of an overall land vegetation 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.

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 and wildfire damage repair.

2.2.2. Preservation of Archaeological Resources

A. CA-SLO-2 Site Management

Archaeological site CA-SLO-2 is managed in compliance with the Archaeological Resource Management Plan (ARMP) and plant operating procedure EV1.ID2. All projects undertaken within site CA-SLO-2, or immediately adjacent, are reviewed to determine whether archaeological deposits associated with the site are present and, if so, an impact assessment is completed. PG&E would invoke the notification, monitoring and mitigation procedures identified in the ARMP if a project-related impact is identified.

Monitoring of site CA-SLO-2 was undertaken on three separate occasions in 2010. Monitoring in September was conducted in coordination with a vegetation management project designed to facilitate access to a 230 kV power pole located within the site that provides back-up off-site electrical power to DCP. The annual photo-monitoring of CA-SLO-2 was conducted in November and December by PG&E archaeologists. Finally, a DCP security infrastructure upgrade project, which constructed new articulating vehicle barrier gates near the southern margin of CA-SLO-2, provided a third opportunity to monitor a portion of the site and collect supplementary information on the nature and extent of the archaeological deposit.

The overall condition of site CA-SLO-2 is stable, with no significant changes observed since the last monitoring event completed in 2009. The barriers in place along the established road ways have proven effective in keeping vehicular traffic off of sensitive portions of the site, and restricting traffic to previously disturbed areas. Dense vegetation that covers much of the site has stabilized loose soil, limiting erosion and obscuring surface artifacts. Localized erosion was noted in three areas, which is being addressed through planned re-vegetation in the spring of 2011. The gradual loss of deposits along portions of the marine terrace subject to natural erosion is being monitored, and opportunistic collection of materials eroding from this area will be undertaken to salvage dateable material and diagnostic artifacts as necessary.

B. Chumash Indian Correspondence

Over the course of 2010, PG&E cultural resource staff corresponded and met with representatives of the local Chumash community on several occasions to discuss cultural resources at DCPD. In general, contact was initiated by PG&E Cultural Resources Specialists to notify Native American contacts of operations and maintenance work proposed in proximity to archaeological site CA-SLO-2, and to solicit their views and concerns. Consultation was also conducted in the broader context of DCPD Operating License Renewal activities. In all, at least 17 individuals were contacted, representing nine organizations and Chumash families. PG&E staff personally met with Chumash representatives on two occasions in 2010. In addition, Native American monitoring of ground disturbance as part of a security infrastructure upgrade project in proximity to CA-SLO-2 was conducted by a member of the Northern Chumash Tribal Council.

3. Unusual or Important Environmental Events

There were no unusual or important environmental events during 2010.

4. Plant Reporting Requirements

4.1. EPP Noncompliance

There were no EPP noncompliances during 2010.

4.2. Changes In Station Design

There were no changes in plant design, 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 2010 per the EPP, and therefore no nonroutine reports were submitted to the NRC.