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PG&E Letter DCL-14-038

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
2013 Annual Nonradiological Environmental Operating Report

Dear Commissioners and Staff:

Enclosed is the 2013 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.

There are no new or revised regulatory commitments in this report (as defined by NEI 99-04).

If you have questions regarding this submittal, or require additional information, please contact Bryan Cunningham at (805) 545-4439.

Sincerely,

Barry S. Allen

mem6/4418/64088691
Enclosure
cc: Diablo Distribution
cc/enc: Peter J. Bamford, NRR Project Manager
Marc L. Dapas, NRC Region IV Administrator
Kenneth A Harris Jr., Executive Officer, CCRWQCB
Thomas R. Hipschman, NRC Senior Resident Inspector

Enclosure
PG&E Letter DCL-14-038

2013 ANNUAL NONRADIOLOGICAL ENVIRONMENTAL OPERATING REPORT DIABLO CANYON POWER PLANT, UNITS 1 AND 2

Pacific Gas & Electric Company
April 2014

1. Introduction

Pacific Gas & Electric Company (PG&E) has prepared the 2013 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 2013, 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). The reports were submitted electronically during the month following the end of each quarter via the California Integrated Water Quality System (CIWQS), an internet database application. DCPP also submitted an annual NPDES report for 2013 to the CCRWQCB in February 2014 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 2013. Copies of the quarterly and annual reports were submitted concurrently in hardcopy format 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 2013, 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, DCPP 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 would continue under the revised NPDES Permit.

DCPP submitted the "Receiving Water Monitoring Program – 2012 Annual Report" (PG&E Letter No. DCL-2013-520) to the CCRWQCB and the NRC on April 26, 2013. The 2013 Receiving Water Monitoring Annual Report will be submitted at the end of April 2014.

2.1.3. Thermal Effects Study

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

2.1.4. 316(b) Studies

DCPP 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 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.

The annual photo-monitoring of CA-SLO-2 was completed on December 13, 2013 by PG&E's Sr. Cultural Resource Specialist.

The overall condition of site CA-SLO-2 is stable, with the exception of areas on the western and southwestern margins of the site that are subject to natural erosion of the marine terrace. In addition, erosion of the steep road cut on the eastern margin of the site continues despite soil stabilization and revegetation work completed in the winter of 2011. Nonetheless, no significant changes were observed since the last monitoring activity was completed in 2012. 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. Signage placed around site CA-SLO-2 remains in place and in very good condition. The perimeter signs instruct all visitors to contact DCPP Management prior to entering the controlled site boundary.

Dense vegetation that covers much of the site has stabilized loose soil, limiting erosion and obscuring surface artifacts. Localized erosion along Diablo Creek Road will be addressed through revegetation measures during the spring of 2014. 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 may be undertaken to salvage datable material and diagnostic artifacts as necessary.

B. Chumash Indian Correspondence

Over the course of 2013, PG&E corresponded and met with representatives of the local Northern Chumash community on several occasions in order to discuss cultural resources

management at DCPP, and the surrounding PG&E owner-controlled lands.

Contact was initiated by PG&E's Sr. Cultural Resources Specialist to notify Native American contacts of planned work associated with an eroding archaeological site located outside of the power plant industrial site (Parcel P). The archaeological work involved salvage of eroding archaeological deposits on the coastal bluff on the property north of the power plant (North Ranch). The salvage archaeological work was completed in cooperation with the Yak Tit^{y}u Tit^{y}u Band of Northern Chumash, who also monitored all of the work.

Northern Chumash representatives were also consulted regarding a planned 2014 prescribed burn that will be located on the southern end of PG&E owner-controlled property, well outside of the developed power plant site (Parcel P).

Lastly, PG&E was in contact with the Yak Tit^{y}u Tit^{y}u Band of Northern Chumash in 2013 regarding interpretive signage installed on the North Ranch property. The signs were developed in collaboration with the local Northern Chumash community, and have been installed along the publically accessible Pt. Buchon Trail.

Related meeting notes and email correspondence generated during 2013 is maintained by PG&E's Sr. Cultural Resources Specialist.

3. Unusual or Important Environmental Events

There were no unusual or important environmental events during 2013.

4. Plant Reporting Requirements

4.1. EPP Noncompliance

There were no EPP noncompliances during 2013.

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 2013 per the EPP, and therefore no nonroutine reports were submitted to the NRC.