

Office: 246 S. Higuera St.
San Luis Obispo, CA 93401
Mail: PO Box 1014
San Luis Obispo, CA 93406



Phone: (805) 544-1777
Email: info@ecoslo.org
Online: www.ecoslo.org

Protecting and enhancing the Central Coast since 1971

August 25, 2015

U.S. Nuclear Regulatory Commission
Cindy Bladey
Office of Administration, Mail Stop OWFN-12H08
Washington, DC 20555-0001

7/11/2015
SDFR 37664
26

RECEIVED

2015 SEP - 1 PM 2:47

RULES AND DIRECTIVES
BRANCH
LEAFLET

RE: Diablo Canyon Power Plant, Units 1 and 2; Notice of Intent to Prepare an Environmental Impact Statement (EIS)

Dear Michael Wentzel and all involved with the Environmental Impact Statement:

The Environmental Center of San Luis Obispo (ECOSLO) has a 42 year history of protecting and cherishing the San Luis Obispo environment. Over the last three years ECOSLO has also been responsible for documenting and cleaning up Fukushima marine debris.

ECOSLO is concerned about this trend in "stovepiping" data. The completely separate Safety and Environmental reports, being written for the relicensing of Diablo Canyon Nuclear Power Plant (DCNPP); are putting unrealistic restraints on conclusions and possible consequences. **The NRC must take a holistic approach to the intertwined Safety, Economic and Environmental impacts of a DCNPP relicense.**

ECOSLO knows there are better ways to secure and sustain our energy future than using fifty year old nuclear technology. It is time to rethink the efficacy of nuclear power generation. By the time this expensive EIS for license renewal is done new advances in energy technology will make generating nuclear power even less economical, less flexible and certainly less sustainable. Advances in energy technology are happening every day - just this year the intractable problem of storing the sun's energy has been solved. Storing the sun's energy is way safer and less costly than storing nuclear waste. **The EIS must address advances in alternative and renewable energy.** Those who claim nuclear power as clean energy can only claim the energy generated is cleaner than burning fossil fuels. But even that is a questionable claim when the mining and manufacture of a nonrenewable resource like uranium is included in the equation. **Therefore any EIS must include a comprehensive analysis of actual environmental costs from cradle to grave. It must compare renewable and nonrenewable energy costs on a level playing field.** From the EPA's Clean Power Plan: "...recent trends evidenced in Renewable Energy development, such as rapidly growing investment and rapidly decreasing costs, are not as clearly evidenced in nuclear generation..." **This important finding and the whole Clean Power Plan from the EPA must be factored into the EIS for license renewal.**

The EIS must address the aging Power Plant and whether the upgrades required by 2025 will be safe and cost effective for energy consumers. One of the biggest concerns of our community is that the

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= m. Wentzel (m5w2)

aging plant and its waste storage will not be a priority for the utility manager (PG&E) if the plant is not making a profit. The environmental consequences of neglect are too devastating to imagine. **The EIS must include a genuine environmental analysis of safety risks, costs and consequences with projections into the future.**

In December of 2014 Tom Luster, Senior Environmental Specialist for the Ca. Coastal Commission, stated unequivocally that Diablo Canyon Nuclear Power Plant is the largest marine predator on the west coast. The entrainment of billions of gallons of fresh seawater everyday to cool the power plant is affecting sea life for 500 miles in coastal shoreline waters. Mitigations for this dramatic deterioration in marine life are almost impossible. The cooling towers proposed to lower some of this effect may help but their costs range from 2-10 billion dollars and create their own list of environmental impacts.

Any EIS developed as part of the proposed license renewal must address this loss to the health of the Ocean. Not only through mitigation measures but through a true cost benefit analysis. The cost benefit analysis must address the destructive effects on the whole marine food chain and the health of the ocean as an economic and environmental cost.

The EIS must address effective mitigations. We have 40 years of new marine science to draw from. Evidence is clear that removing huge amounts of larvae, small food fish and planktons could collapse the whole marine life cycle. The world's ocean health is under extreme stress already from toxic plumes, plastics gyres and climate change. **The EIS for license renewal of the Diablo Canyon Nuclear Power Plant must provide a comprehensive study of these added stressors and clear plans for avoiding system collapse within the effected 500 mile radius.**

On behalf of the ECOSLO Board of Directors and the members of ECOSLO,



Mary A. Ciesinski
ECOSLO Executive Director, ECOSLO
executive-director@ecoslo.org