

6-8-75

U.S. Nuclear Regulatory Commission

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
PACIFIC GAS & ELECTRIC CO. )  
Diablo Canyon Units 1 and 2)

NRC Docket 50-275/323

SCENIC SHORELINE MOTION  
PERTAINING TO TITANIUM TUBING AND ASSOCIATED MATTERS

Intervenors hereby move your Board for an order requiring Pacific to assume its burden of proof by showing that titanium would in fact resolve the pollution problem created by the copper tubing to be replaced and that it would not create pollution and other impact problems of equal or greater magnitude. We further move that such review be pursuant to the National Environmental Policy Act, including an EIS statement and public hearings, and that a stay in the replacement of the copper tubing be ordered pending the outcome of this review.

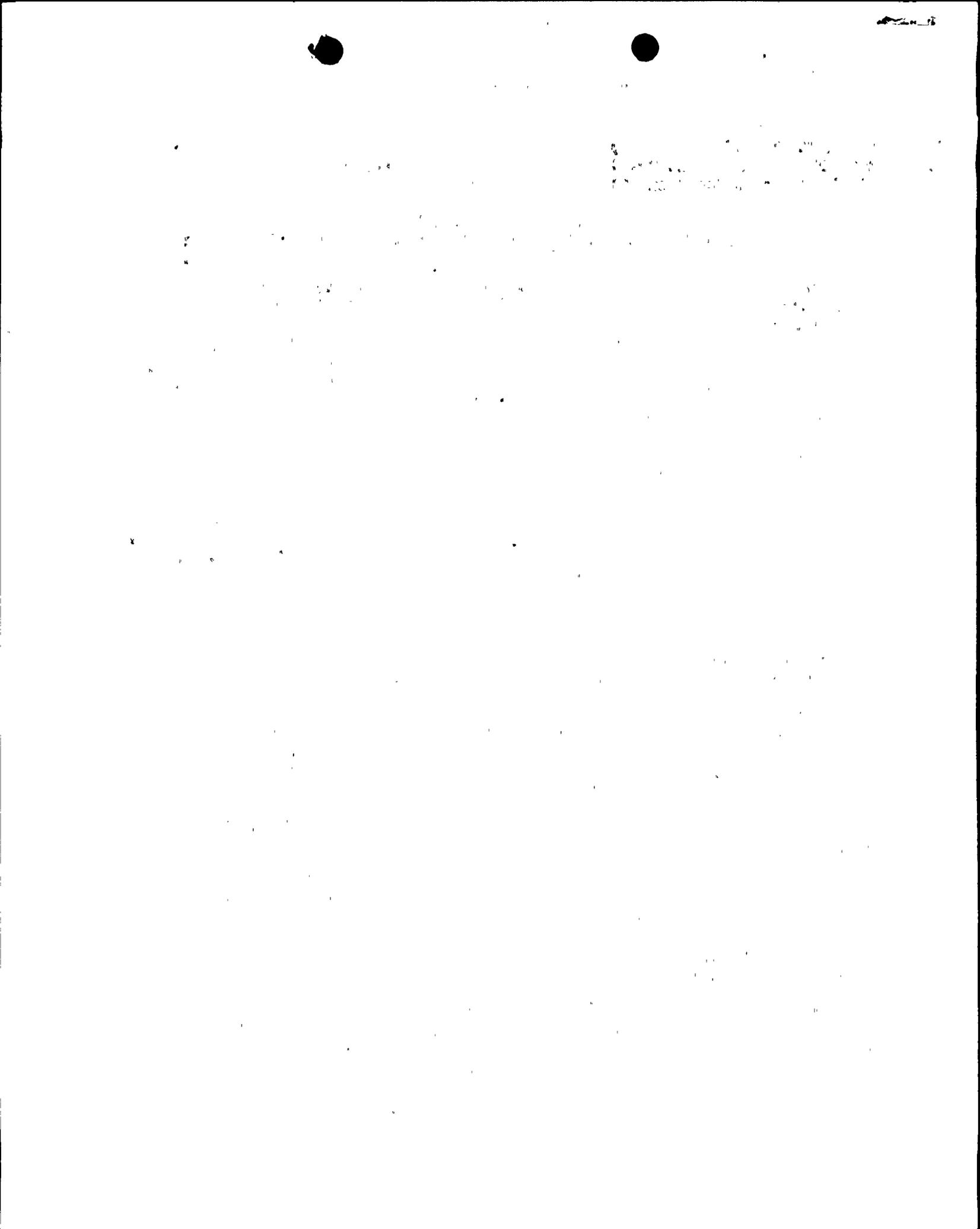
At the May 28, 1975, preconference hearing in Avila Beach, Pacific announced that the copper tubing in the Diablo complex was to be replaced by tubing of titanium for the purpose of alleviating copper damage to the marine environment. This costly retrofit, reportedly approximating \$10 million, would remove from the cooling system 90% of the copper affected by salt water corrosion.

Pursuant to informal discovery, Scenic Shoreline requests copies for all parties of documents submitted to your Board announcing this retrofit and any other reports providing data on the reconstruction project, including, but not limited to, information on the construction schedule, relevant ecological studies, reactor service experience with titanium tubing, alternatives to the proposed action, and cost-benefit analyses.

At EIS hearings Scenic Shoreline plans to present available expert testimony on the risks with titanium tubing of biological fouling, the cooling system's resultant loss of heat exchange capability, and the decrease of the tubing's flow rate. It is our contention that these impacts, and management programs to alleviate them, would cause severe impairment of the facility and the environment leading to additional costly retrofits. The impact would also be intensified by titanium's susceptibility to pitting, scaling, stress cracking, and tube vibration.

Pacific's evident unilateral decision to utilize titanium further violates the NEPA requirements for presentation of alternatives to a proposed action and the consideration of best practical technology defined by the Federal Water Pollution Control Act Amendments of 1972. At hearings Scenic Shoreline would present new data on the latest application of such practical alternatives as tubing of other metals and alloys; a deepwater diffuser pipe system extension from alternative tubing systems composed of various metals and alloys; and cooling towers. These evaluations would include recent information on the suitability of these various technologies in meeting persistent cooling system deficiencies, such as organic foam problems, screen impingement impact, and entrainment damage.

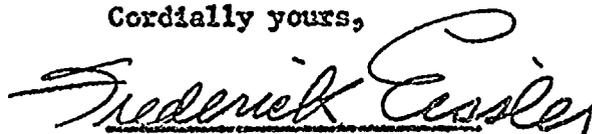
The merits of this motion justify a stay of reconstruction. The recent history of scientific-industrial development has demonstrated that technology devised to alleviate pollution often compounds it. The record of Diablo hearings shows that intervenors were concerned early in deliberations on the



nuclear complex over the severe toxic impact of copper tubing upon the marine environment. The new pollution control laws have been advanced in recognition of the limitation of industry's unilateral judgments and the importance of supplementary public input through such forums as NEPA review procedure.

Intervenors, their officers and families, and members residing in the vicinity of the Diablo area would be affected financially as rate payers by any costly ill-advised retrofits and potential subsequent adjustments to remedy the inadequacies of these retrofits. The quality of their environment and of publicly-owned state and federal waters would be irreparably injured by Pacific's action. Other parties, such as intervenors associated with fisheries interests, would be substantially harmed by inadequate consideration of alternative actions that assure environmental integrity. Failure at this point to anticipate exigencies and alternatives related to cooling water problems would cause future delays of greater cost to the Applicant and the ratepayer for additional retrofits. Pacific's private interest, as well as the public interest, requires a stay of reconstruction pending thorough, expeditious review of this matter now.

Cordially yours,



Frederick Eicsler  
President

Dated: June 8, 1975

Xc: ASLB members

All Parties

20 conformed copies  
Original



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