

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD —
CENTRAL COAST REGION**

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December 24, 1982

Dr. Nunzio J. Palladino, Chairman
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Palladino:

Thank you for Mr. Denton's letter of July 21, 1982, in response to our concerns about the Pacific Gas and Electric Diablo Canyon Nuclear Power Plant expressed in our letters of January 19, and February 18, 1982. However, Mr. Denton's letter does not adequately address several important issues. Thus, we address this letter to you.

The California Regional Water Quality Control Board, Central Coast Region, has jurisdiction over the discharge of pollutants from the Diablo Canyon facility into waters of the United States. The Board has issued an NPDES permit pursuant to the Clean Water Act for the facility. Thus, the Board is particularly concerned with these unanswered issues.

First, regarding our concern about radiation discharged into the atmosphere, Mr. Denton's letter states that in Supplement No. 6 of the SER, the dose from liquid effluents and presumably gaseous effluents released from the Diablo Canyon Power Plant for a resident of the Diablo Canyon area who makes frequent use of the ocean shore and whose dietary habits include substantial amounts of fish and abalone is insignificant. The estimated dose is less than .02% of the natural background. This Board raised the question of the removal of gaseous radioactive isotopes by the rain and/or fog and the possibility of them entering the ocean or other waters in the vicinity. Mr. Denton advised us that the solubility of the isotopes is available in the International Critical Tables. This is not an answer to the original question. Has the NRC carried out the calculations to determine the potential removal of the gaseous radioactive isotopes by this mechanism? What are the results of these calculations? If it has not been considered, we would like to know why not.

Second, we still have several concerns regarding the release of radioactive material to the Pacific Ocean. Mr. Denton's answer to our questions regarding the use of a dilution factor in calculating allowable radioactive releases is not very reassuring. It seems to us that the technology must

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exist to keep all radioactive material out of the cooling water discharge system. Closed cooling system plants such as Rancho Seco in California must use a different rad-treatment system, since discharge to a water body is not available. Is cost the only justification for not requiring such a system at Diablo Canyon? Please define "as low as reasonably achievable" in the context of comparing the Diablo Canyon rad waste treatment system to that used at Rancho Seco.

Our third concern which the Board feels was not adequately addressed in Mr. Denton's response is the potential for a major release of radioactive waste to the Pacific Ocean as the result of an accident or other untemplated release at Diablo Canyon. The plants' immediate proximity to the Pacific Ocean underscores the need for a comprehensive evaluation of existing and potential safety systems relating to liquid pathways. We believe that such an evaluation is critical.

In your review of earthquake safety and design errors at this facility, we again request that you make sure that all structures and piping which may result in accidental or unauthorized discharge to the Pacific Ocean be thoroughly inspected and audited independently, and where necessary, brought up to standards which will prevent chemical or radioactive contamination of the ocean.

We urgently request that you further address the above stated concerns as soon as possible as fuel may be loaded at the plant in early 1983. Protection of the public health and safety is the responsibility of both of our agencies and cooperation between us on these issues of mutual concern can only benefit the public.

Sincerely,



MARIT EVANS, CHAIRMAN

Central Coast Region

California Regional Water Quality Control Board

cc: Central Coast Region Board Members

Mr. L. L. Mitchell, State Water Resources Control Board, Sacramento

Mr. Ed Anton, Technical Services Division, SWRCB, Sacramento

Mr. Gary Grimm, Legal Counsel, SWRCB, Oakland

Nuclear Regulatory Commission, Walnut Creek

Mr. David Williamson, Senior Counsel, Pacific Gas & Electric Co.,
San Francisco

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