

APPENDIX B

TO FACILITY OPERATING LICENSE NO. DPR-
DIABLO CANYON NUCLEAR GENERATING STATION
UNITS 1 AND 2

PACIFIC GAS AND ELECTRIC COMPANY

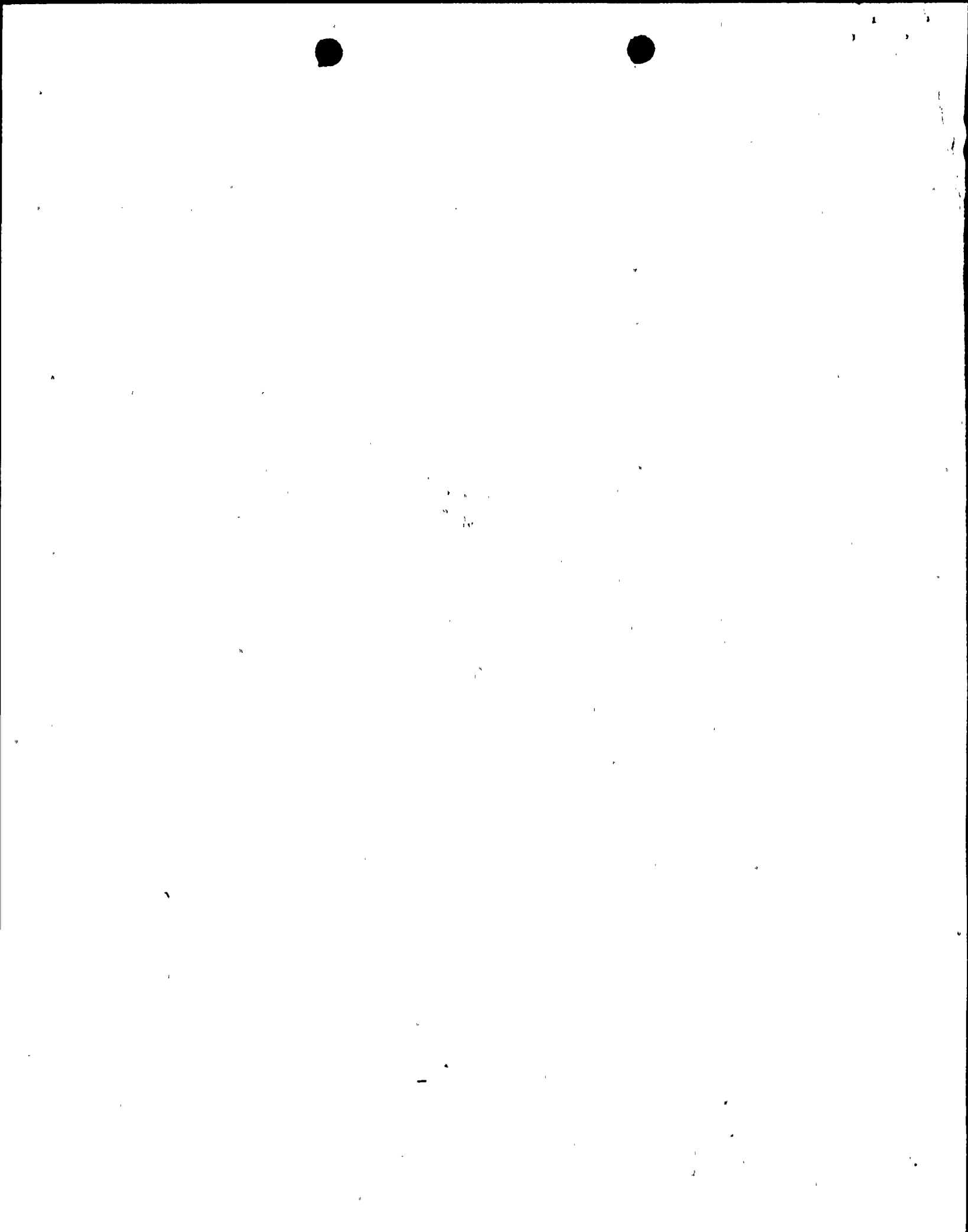
DOCKET NOS. 50-265 and 50-323

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ENVIRONMENTAL PROTECTION PLAN
(NON-RADIOLOGICAL)

April 1981

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DIABLO CANYON NUCLEAR GENERATING STATION

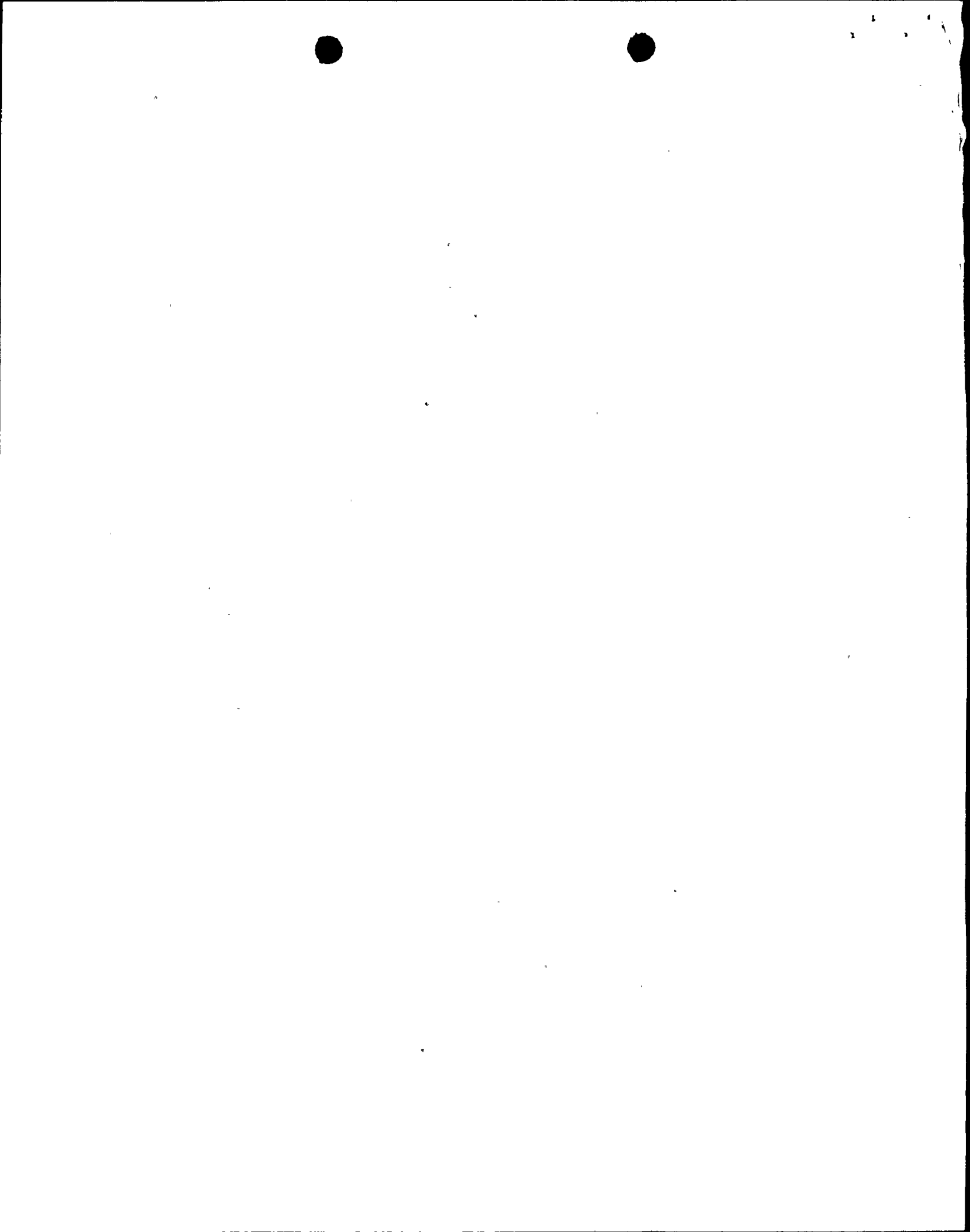
UNITS 1 AND 2

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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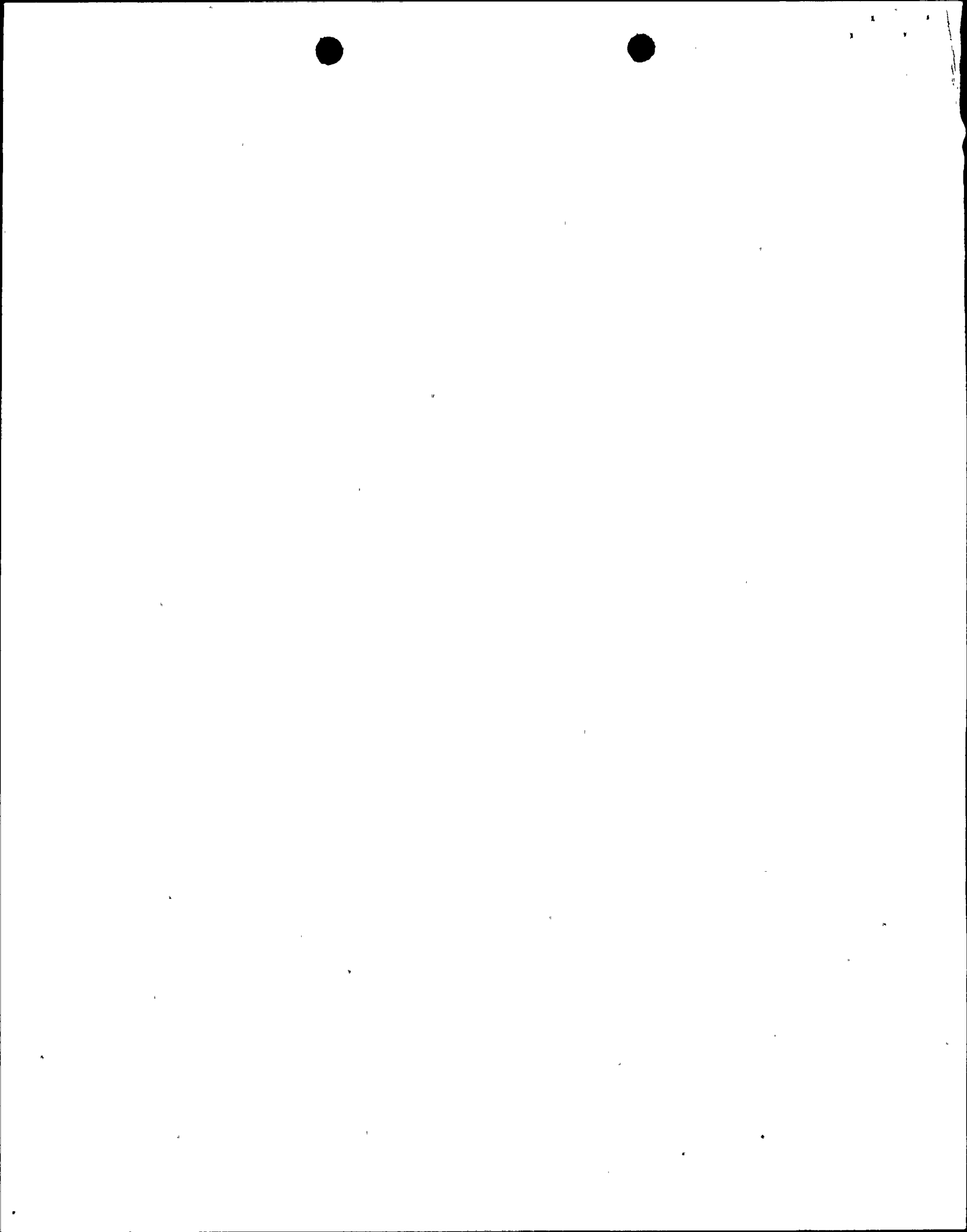


1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during construction and operation of the nuclear facility. The principal objectives of the EPP are as follows:

- (1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.
- (2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.
- (3) Keep NRC informed of the environmental effects of facility construction and operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's NPDES permit.



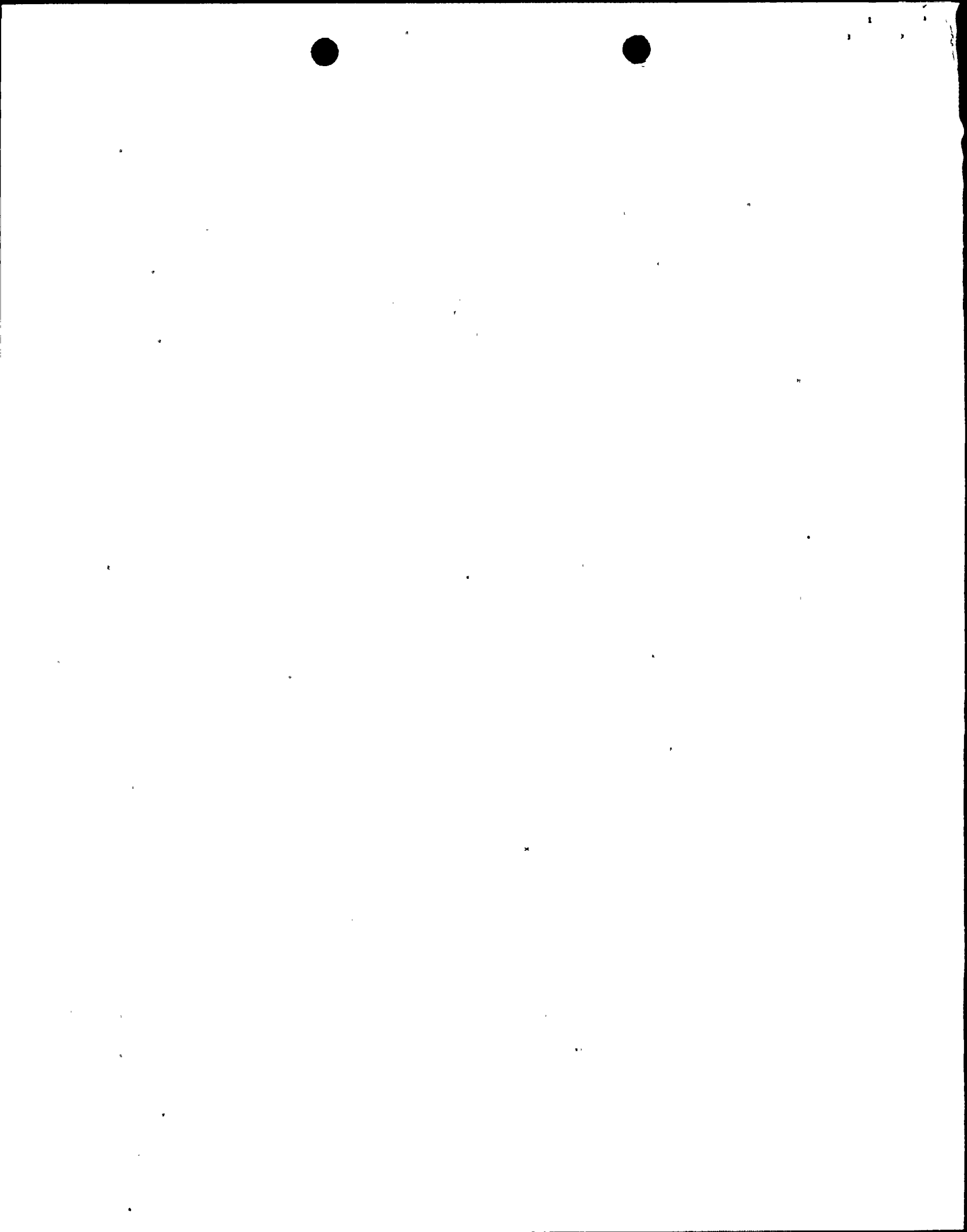
2.0 Environmental Protection Issues

The staff identified in the FES-OL dated May 1973 and FES-OL Addendum, dated May 1976 certain environmental issues which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment from the operation of the Diablo Canyon Nuclear Generating Station Units 1 and 2. On June 12, 1978, the Atomic Safety and Licensing Board issued a partial initial decision in favor of licensing Diablo Canyon Units 1 and 2 subject to certain conditions for the protection of the environment. The conditions needed to resolve these concerns resulting from the environmental impact review are as follows:

2.1 Aquatic Issues

Specific aquatic issues raised by the staff or the hearing board were:

- (1) The need to control the release of chlorine and study its effects on marine life (FES-OL Sections 3.5, 5.3, 6.3, 12.3, and 13.3)
- (2) The need to study the amount, persistence, and stabilization of foam generated by the discharge of cooling water (FES-OL Addendum Section 5.2, ASLB, p. 97)
- (3) The need to confirm that thermal mixing and current patterns occur as predicted and that heat treatment is limited. (FES-OL Section 3.3 and 5.3; Addendum Sections 3.3 and 6.0)



- (4) The continuation of preoperational monitoring studies on intertidal and subtidal biota particularly bull kelp and abalone during operation. (FES-OL Sections 3.5 and 6.0; Addendum Section 5.3 ASLB, p. 98)
- (5) The need for special studies to document levels of intake, entrainment on eggs and larvae of fish and abalone and impingement on fish and invertebrates. (FES-OL Sections 5.3 and 6.2; Addendum Sections 5.3 and 5.4; ASLB p. 97)

Aquatic issues are addressed by the effluent limitations, monitoring requirements and the Section 316(a) and (b) demonstration requirements contained in the NPDES permit issued by California Regional Water Quality Control Board. The NRC will rely on this agency for resolution of the issues involving water quality and aquatic biota.

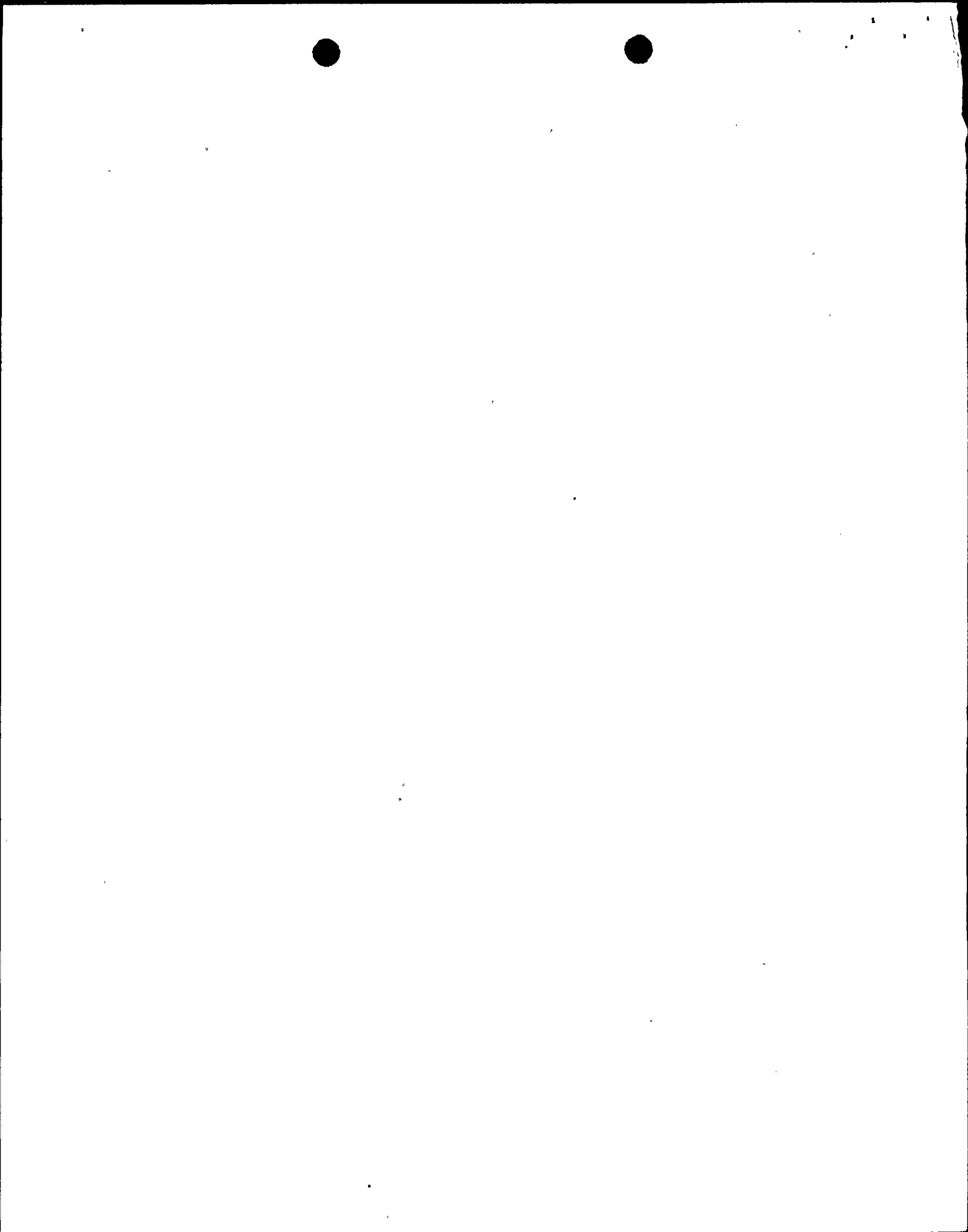
2.2 Terrestrial Issues

Specific terrestrial issues raised by the staff or the hearing board were:

- (1) A program to assure erosion control within the transmission line corridor. (FES-OL Addendum Section 4.2.2)

This requirement shall be satisfied as follows:

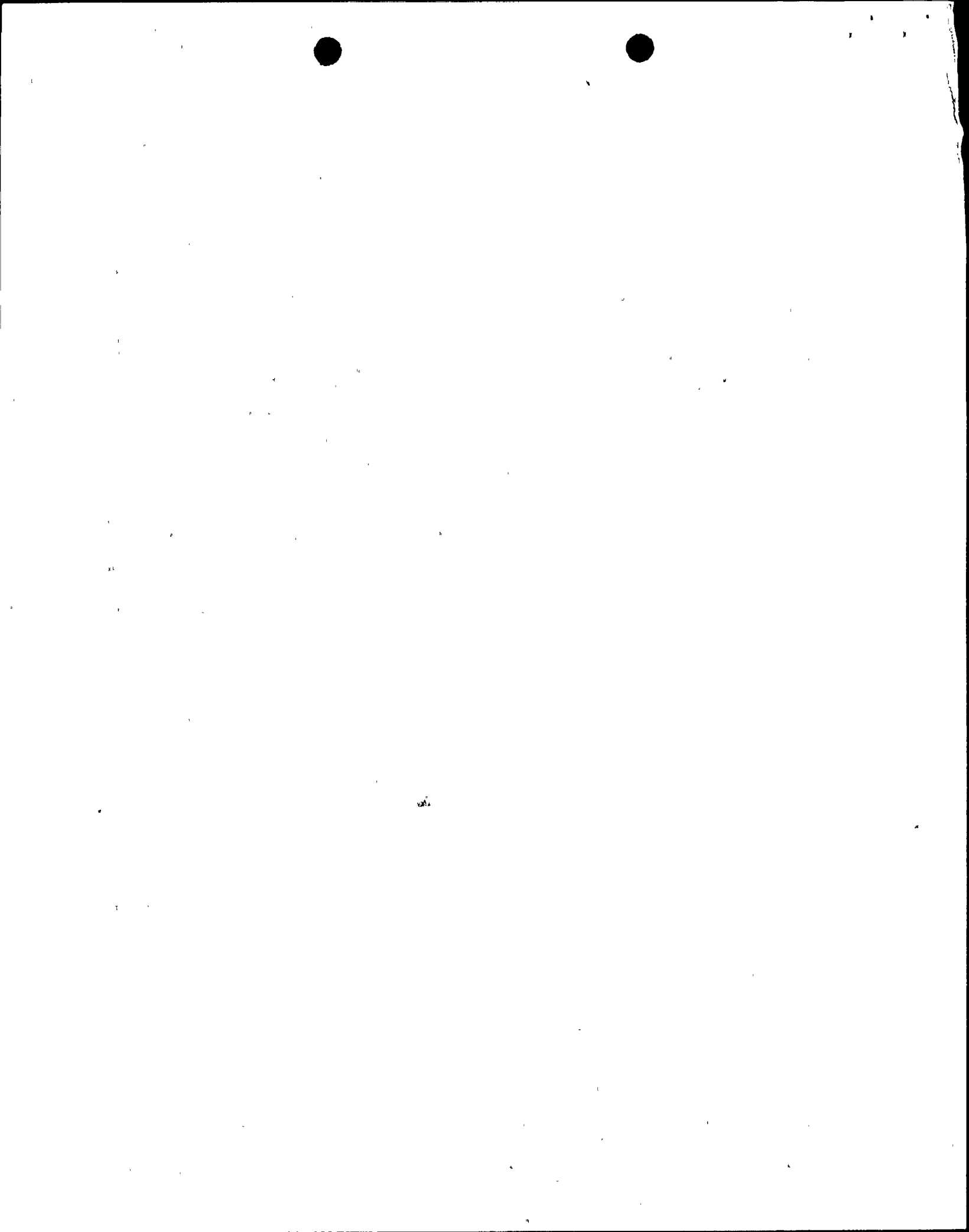
Conditions and monitoring requirements for the control of erosion within the transmission line right-of-way are specified by the California Public Utilities Decision No. 79726. Nonconformance with the positions of Decision No. 79726 shall be reported to the NRC.



(2) The need for controlled use of herbicides on transmission rights-of-way if they are used. (FES-OL, Section 5.3.1)

(3) The need to preserve a shell midden of archeological significance on the Diablo Canyon Plant site and provide access to the site by local Indians. (ASLB Hearing Transcript, pp. 3424-3442 & pp. 3361-3369)

NRC requirements with regard to these terrestrial issues are specified in Subsection 4.2 of this EPP.



3.0 Consistency Requirements

3.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the Environmental Protection Plan*. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in unauthorized construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation. When such activity involves a change in the Environmental Protection Plan, such activity and change to the Environmental Protection Plan may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to

*This provision does not relieve the licensee of the requirements of 10 CFR §50.59.



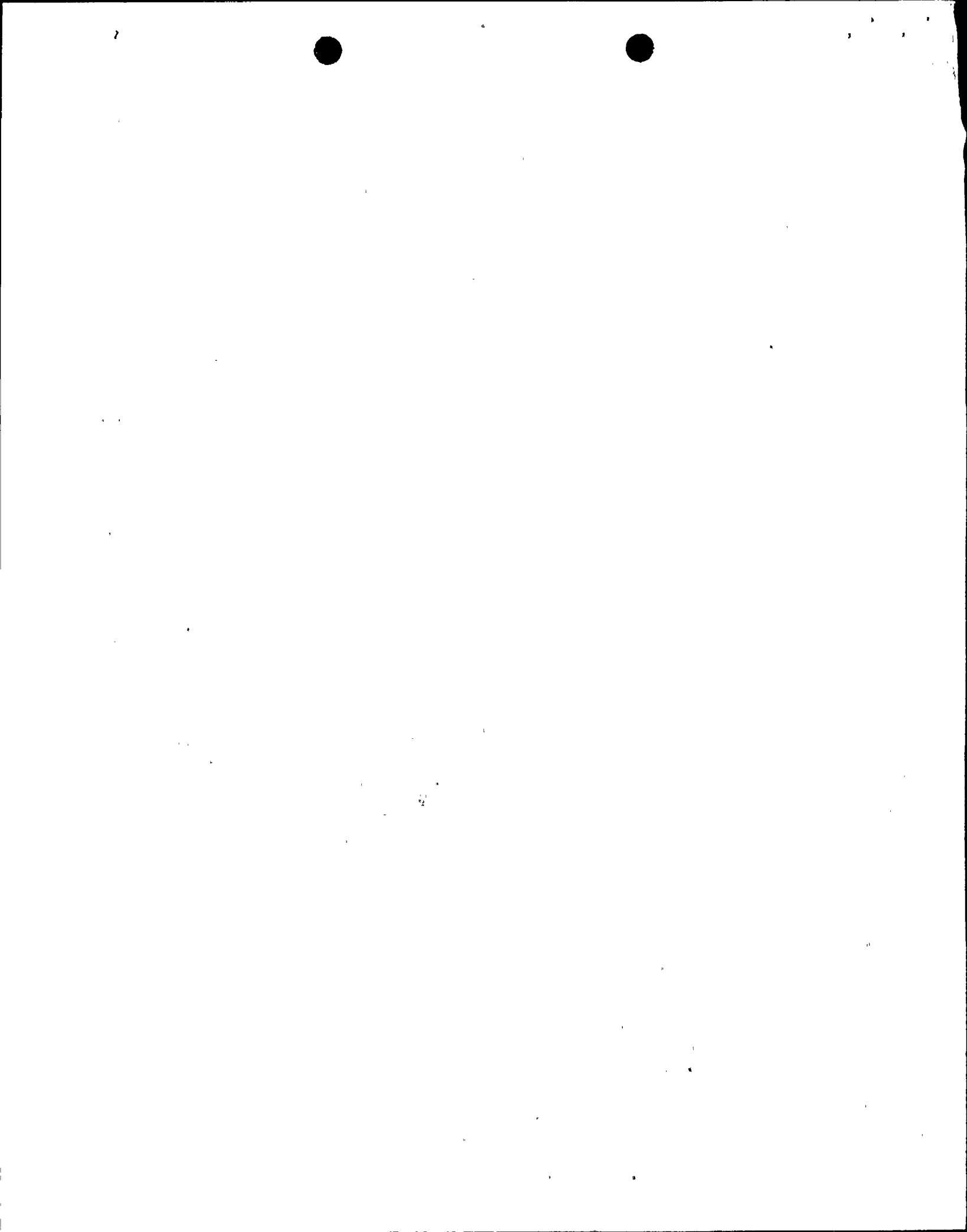
the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level [in accordance with 10 CFR Part 51.5(b)(2)] or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permits and State Certifications

Violations of the NPDES Permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by submittal of copies of the reports required by the NPDES Permit or certification. The licensee shall also provide the NRC with copies of the results of the following studies at the same time they are submitted to the permitting agency:

- i) Section 316(a) Demonstration Study
- ii) Section 316(b) Demonstration Study

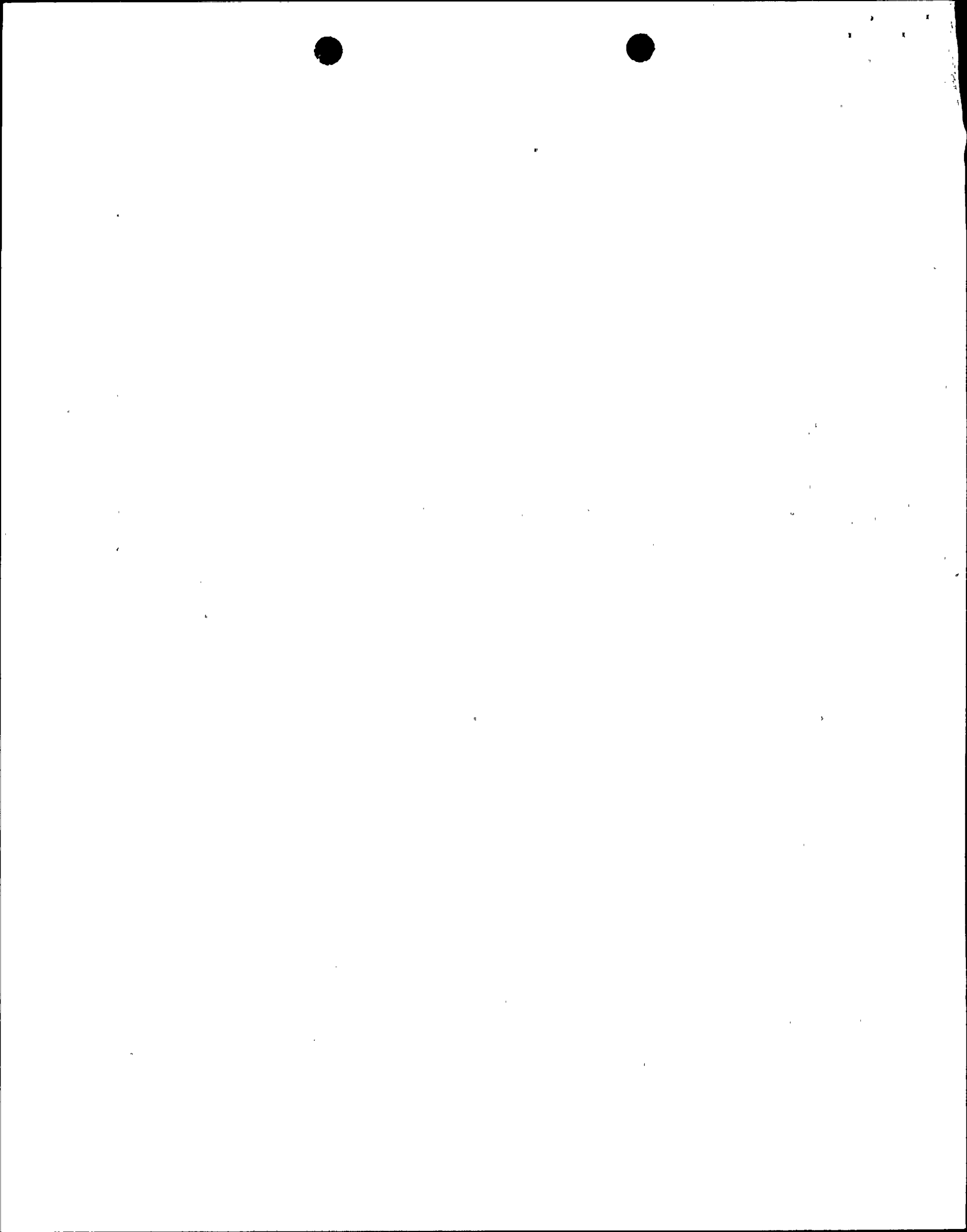


Changes and additions to the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The NRC shall be notified of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The notification of a licensee-initiated change shall include a copy of the requested revision submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES permit at the same time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are required to achieve compliance with other Federal, State, or local environmental regulations are not subject to the requirements of Section 3.1.



4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

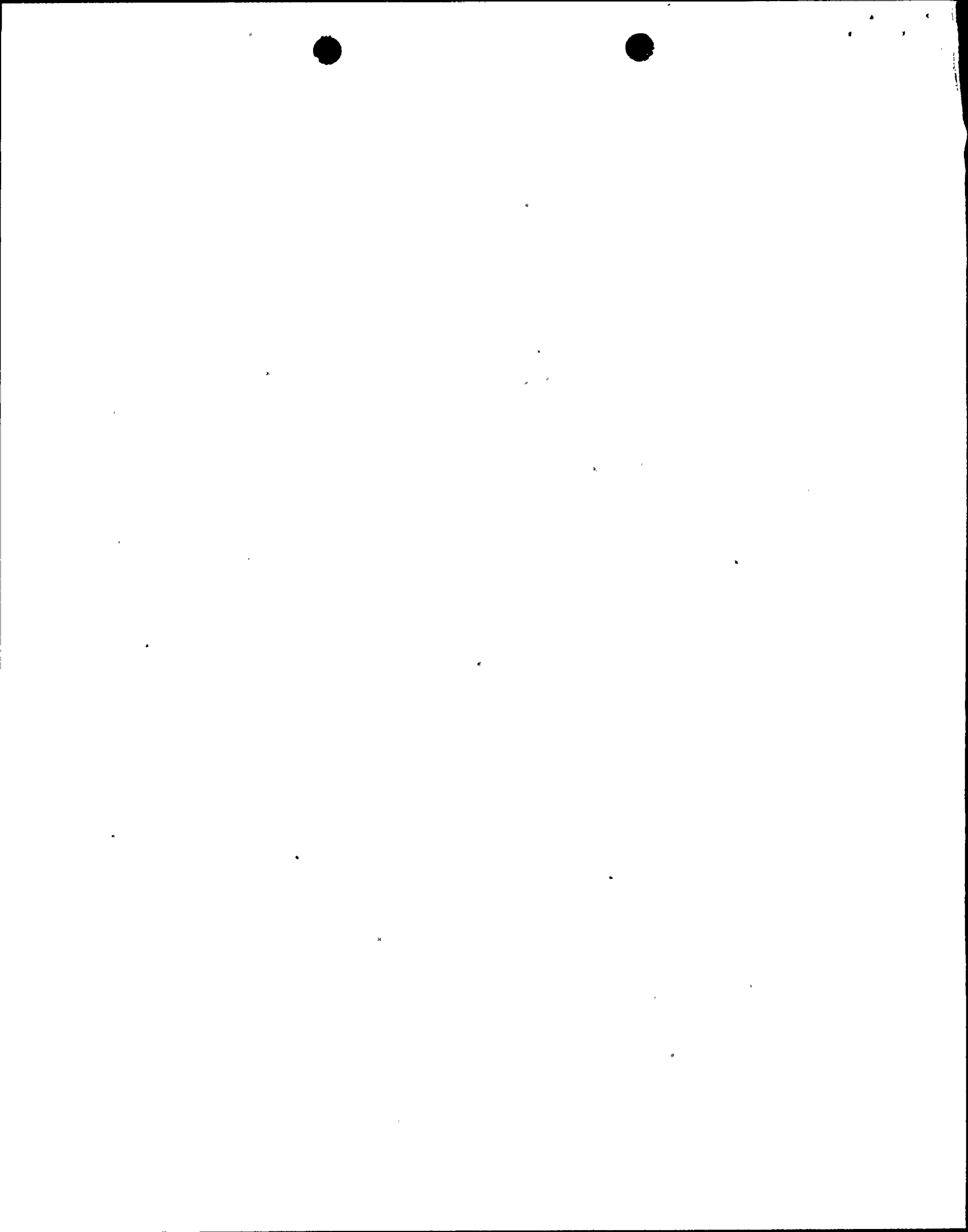
Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours by telephone, telegraph, or facsimile transmissions followed by a written report within 30 days, as specified in Subsection 4.5.2. The following are examples: excessive bird impaction events; onsite plant or animal disease outbreaks; mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973; fish kills; increase in nuisance organisms or conditions; and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Herbicide Applications

The use of herbicides within the corridor rights-of-way associated with the station shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by State authorities and applied as directed by said authorities. Reporting requirements shall apply only during the period of herbicide applications for those corridor rights-of-way associated with the station.



4.2.2 Preservation of Archaeological Resources Requirements

The licensee shall avoid disturbances to the SLO-2 site in accordance with the Archaeological Resources Management Plan submitted to the California State Office of Historic Preservation on April 7, 1980.

Should a disturbance of the SLO-2 site inconsistent with the allowable use of the site under the Archaeological Resources Management Plan be necessary the licensee shall report the planned disturbance to the NRC in accordance with Subsection 5.4.2..

The licensee shall develop a plan for controlled access by the Chumash Indian Tribe to the SLO-2 site for religious activities, and transmit the plan to appropriate tribal representatives for negotiation. The plan shall provide for reasonable controlled access to the site, taking into account plant-related security and public health and safety constraints. A good-faith effort shall be demonstrated by the licensee to reach agreement with the Chumash Tribe on the plan within one year from the date of license issuance.



5.0 Administrative Procedures

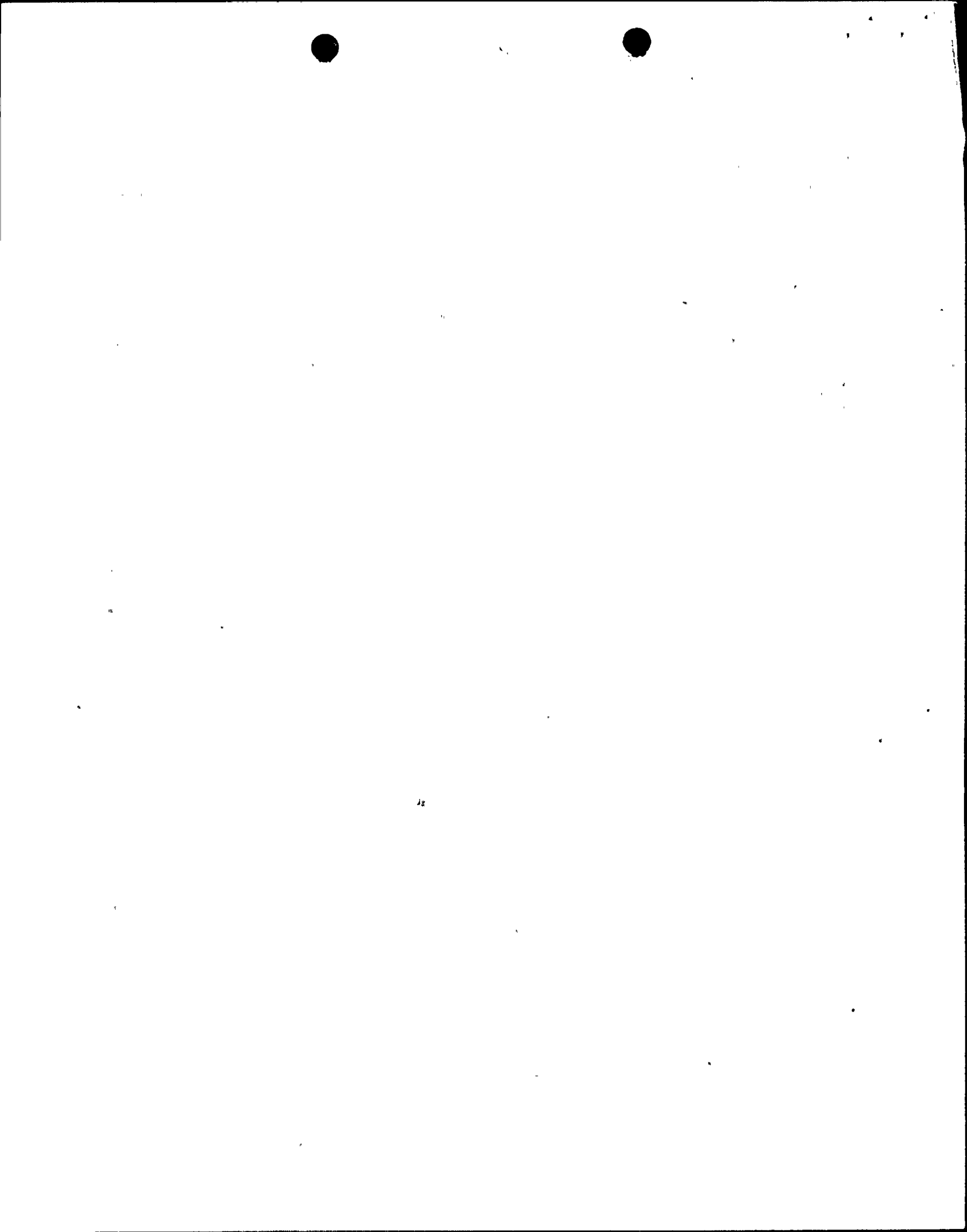
5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records and logs relative to the environmental aspects of plant operation shall be made and retained in a manner convenient for review and inspection. These records and logs shall be made available to NRC on request.

Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained for the life of the plant. All other records, data and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.



5.3 Changes in Environmental Protection Plan

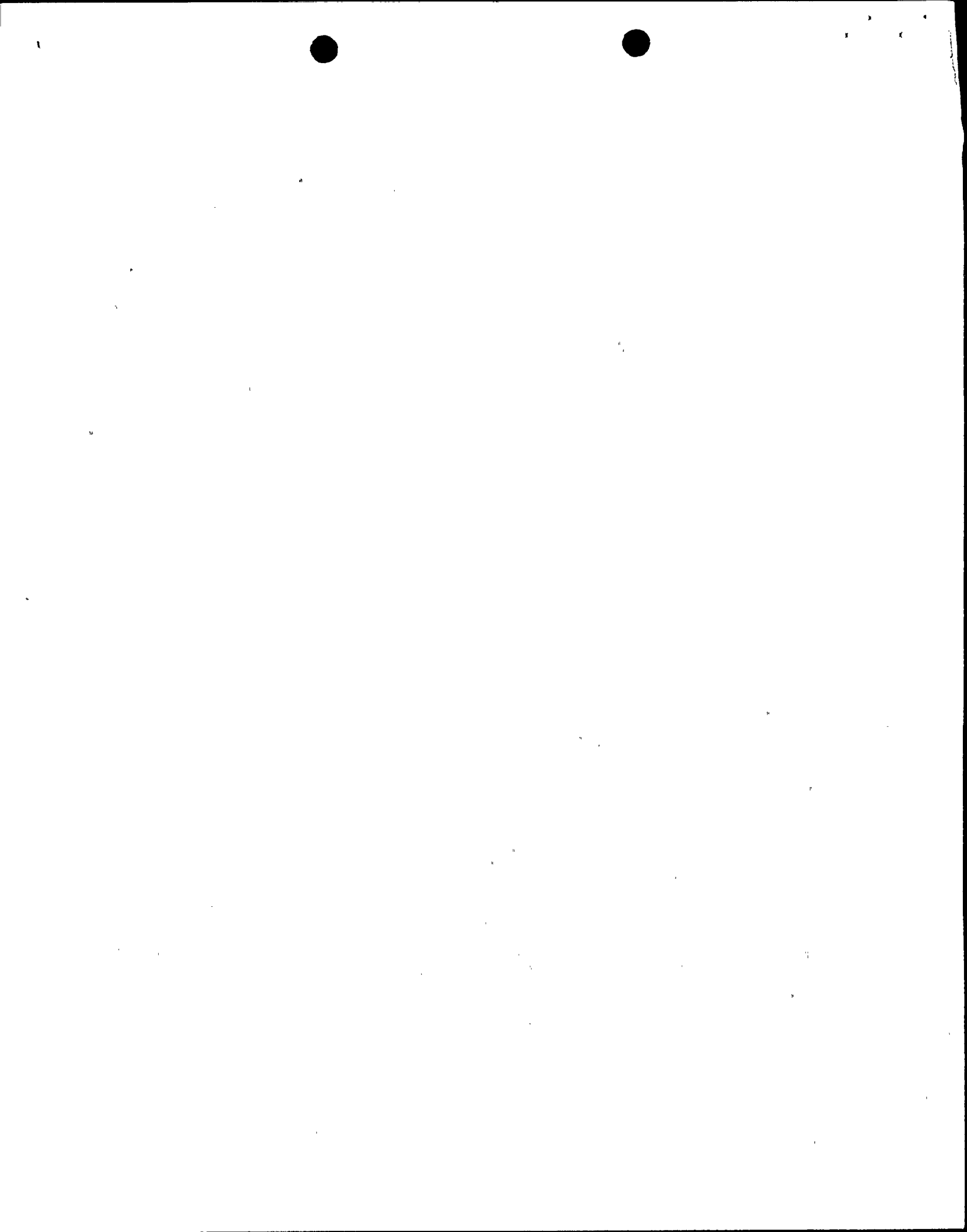
Request for change in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the Environmental Protection Plan.

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

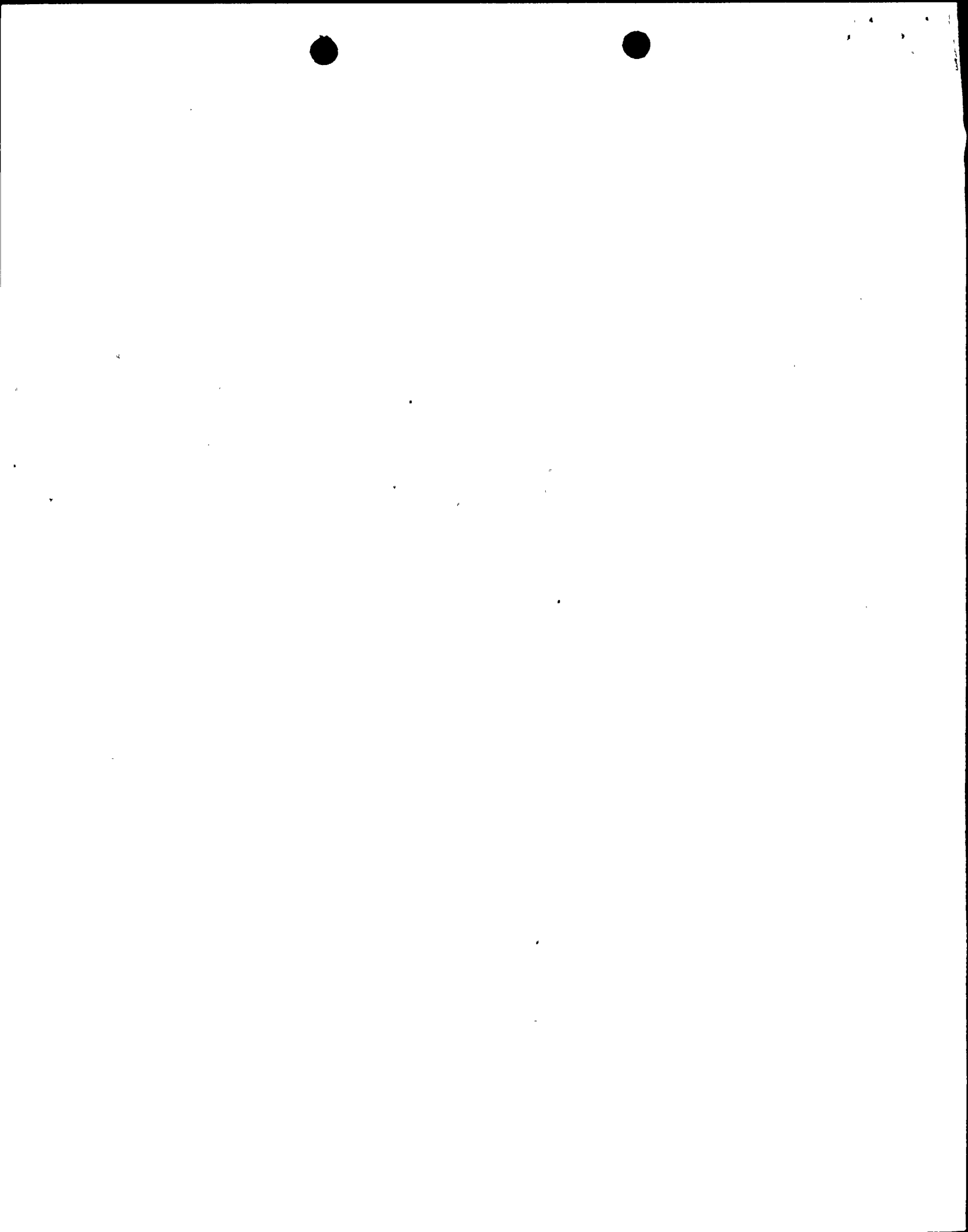
The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of this Environmental Protection Plan for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.



The Annual Environmental Operating Report shall also include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental issue.
- (c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.



5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of nonroutine event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

