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James D Shiffer
Vice President
Nuclear Power Generation

April 1, 1988

PG&E Letter No. DCL-88-076



U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Informational Notice, CA-SLO-2 Site Activities

Gentlemen:

PG&E is providing this informational notice to the NRC because of an activity scheduled to take place within the archaeological site, CA-SLO-2 (SLO-2) located to the north of Diablo Canyon Power Plant. The California State Office of Historic Preservation is concurrently being informed of these activities. Details of these scheduled activities are provided in the Enclosure.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

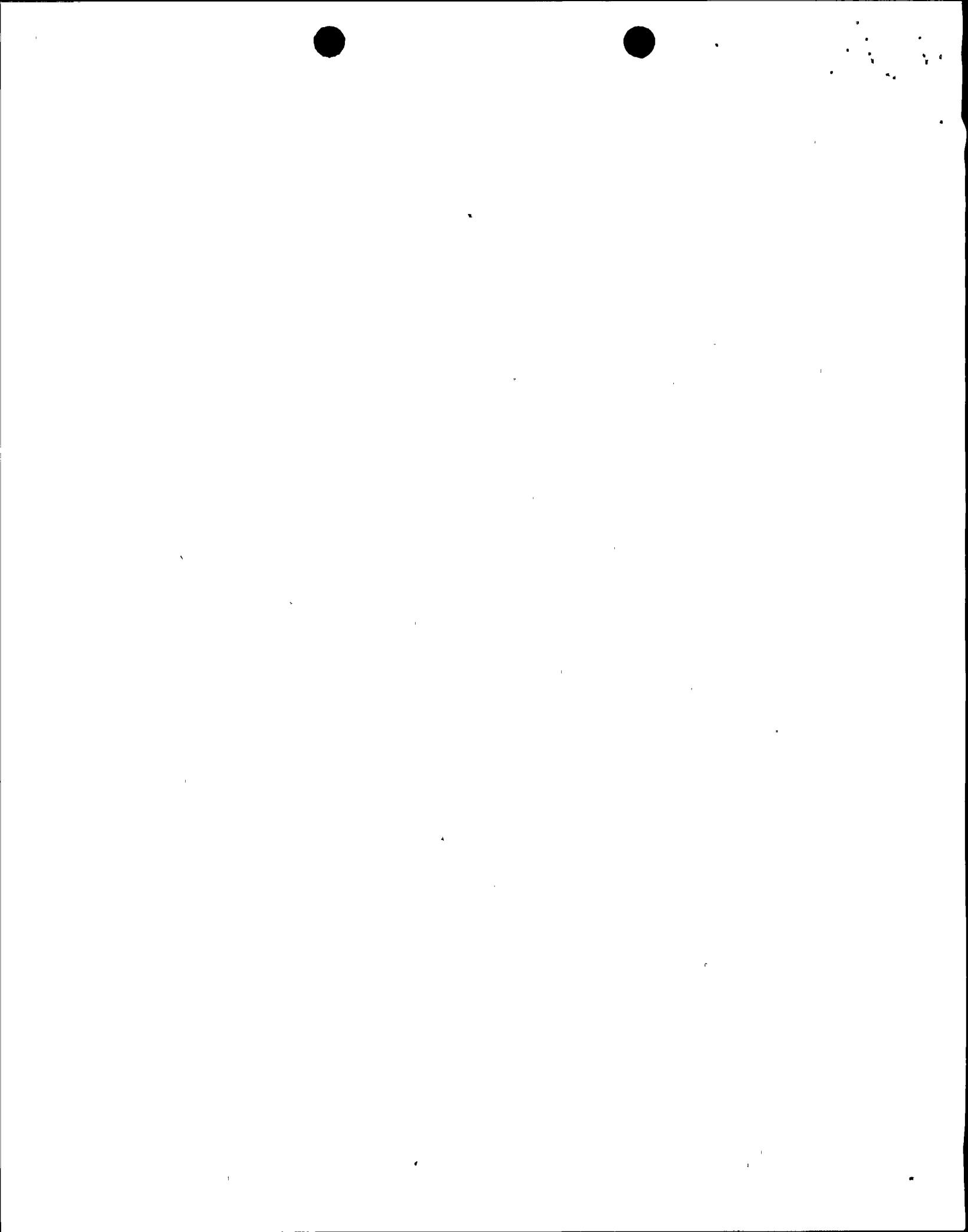
A handwritten signature in black ink, appearing to read 'J. D. Shiffer'. The signature is fluid and cursive, with a large initial 'J' and 'S'. Below the signature, the name 'J. D. Shiffer' is printed in a simple, sans-serif font.

cc: Kathryn Gaultieri
California State Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

cc w/o Attach.: James T. Allen, Ph.D
Chief, Northern California Section
California Department of Health Services
Toxic Substances Control Division
4250 Power Inn Road
Sacramento, CA 95826

Jim Breitlow
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

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Document Control Desk
PG&E Letter No. DCL-88-076

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April 1, 1988

cc w/o Attach.: William Leonard
California Regional Water
Quality Control Board
Central Coast Region
1102-A Laurel Lane
San Luis Obispo, CA 94301

J. B. Martin
M. M. Mendonca
P. P. Narbut
B. Norton
H. Rood
B. H. Vogler
CPUC
Diablo Distribution

Enclosure

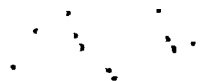
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bcc w/o Attach: BSLeW
RFLocke
GHMoore
BHNesbit
RJPeters

1989S/0055K/ERK/1308



ENCLOSURE

DISCRIPTION OF ACTIVITIES

PG&E will be closing the Diablo Canyon Power Plant wastewater holding pond (pond or surface impoundment) just north of and adjacent to SLO-2 as well as the associated pipes that traverse SLO-2 (Attachment 1). Pond closure is required by Section 3005(j) of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended (42 U.S.C. 6925).

Under Section 3005(j), surface impoundments that were in existence on November 8, 1984 and eligible for authorization to operate under interim status must meet the minimum technological requirements (MTRs) of Section 3004(o)(1)(A) of RCRA, 42 U.S.C 6924, by November 8, 1988. To meet the MTRs, an expensive upgrade of the pond would have been necessary. PG&E elected, instead, to replace the pond with a wastewater holding and treatment facility which was permitted to operate on June 8, 1987. Without the pond upgrade, Section 3005(j) requires that the pond cease accepting hazardous waste by November 8, 1988. While Section 3005(j) does not require that the pond be certified closed by November 8, 1988, the closure process must proceed in a manner consistent with the provisions of 40 CFR 265.

PG&E's general activities during closure are prescribed by 40 CFR 265.228 which states in part:



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(a) At closure, the owner or operator must:

- (1) Remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated subsoils, and structures and equipment contaminated with waste and leachate, . . . (Emphasis added)

In addition to the foregoing, PG&E is required to comply with the California Department of Health Services' (DHS) and California State Water Resources Control Board's regulations for closure of surface impoundments.

To satisfy these requirements PG&E jointly developed a RCRA Hazardous Waste Closure Plan for the Wastewater Holding Pond at the Diablo Canyon Power Plant (Closure Plan) (Attachment 2) in conjunction with the Environmental Protection Agency (EPA), DHS and the California Regional Water Quality Control Board, Central Coast Region (CCRWQCB). The Closure Plan, which has been approved by the DHS and EPA, directs PG&E to begin closure activities no later than May 2, 1988 and to complete them within 180 days.

This Closure Plan describes in detail the steps, procedures, and criteria for the following:

1. The physical and chemical testing of pipes, concrete, and subsoils to determine the extent of contamination and to confirm when contamination is not present, and
2. The methods for removal, handling, and disposal of all waste materials that are hazardous or contaminated, and



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3. The archaeological, geological, and health and safety monitoring to be performed during these activities.

Since the pond is located outside the boundaries of SLO-2, those activities which are directly associated with pond closure are not expected to affect the SLO-2 site. However, some limited closure activities associated with the testing and removal of the pipes that lead from the plant to the pond will occur within the boundaries of SLO-2. These activities, which are more fully described in the Closure Plan, include the following:

1. Drilling of 11 soil borings.
2. Removing a 16 x 20 ft concrete slab from previously disturbed soils.
3. Exposing 1400 ft of buried pipe within previously disturbed soils.
4. Hydrotesting the pipes in place to locate leaking joints.
5. Removing the pipes.
6. Collecting initial soil samples for analysis to determine soil contamination
7. Removing contaminated soil as necessary.

As required by Section 4.2.2 of the Environmental Protection Plan, Appendix B to NRC Operating Licenses DPR-80 and DPR-82, PG&E plans to conduct these activities in a manner which will avoid disturbances to the SLO-2 site in accordance with the Archaeological Resources Management Plan (ARMP).

Pursuant to the approved Closure Plan, 11 borings will be drilled to determine background soil constituents. These soil borings are necessary to develop constituent background levels for determining the degree and extent of contamination in places where leaks may have occurred. The borings will be located to assure that there is no significant impact to the SLO-2 site. Each soil boring will be six inches in diameter and approximately 30 feet deep. Four of the borings will be located in the road bed adjacent to Diablo Creek in sterile soils below the strata of existing archaeological deposits. The other seven borings will be initiated in previously disturbed soils along existing roads or in the fill cap. Some portions of these small diameter borings will penetrate previously undisturbed soils. In accordance with the Closure Plan a professional archaeologist will monitor the borings as well as all other activities which must be conducted within SLO-2.

During hydrotesting, PG&E may well find some leaks in the pipes that traverse SLO-2. In this event, PG&E will perform soil sampling and analysis to assess the degree and extent of soil contamination. If the extent of contamination appears to significantly intrude into undisturbed soil, PG&E will consult with the NRC and the California State Office of Historic Preservation prior to proceeding.



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While it is PG&E's intention, pursuant to the approved Closure Plan to remove all residual contaminated soil, PG&E will, if appropriate, enter into an alternative post-closure plan acceptable to the involved agencies.



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PG&E Letter No. DCL-88-076








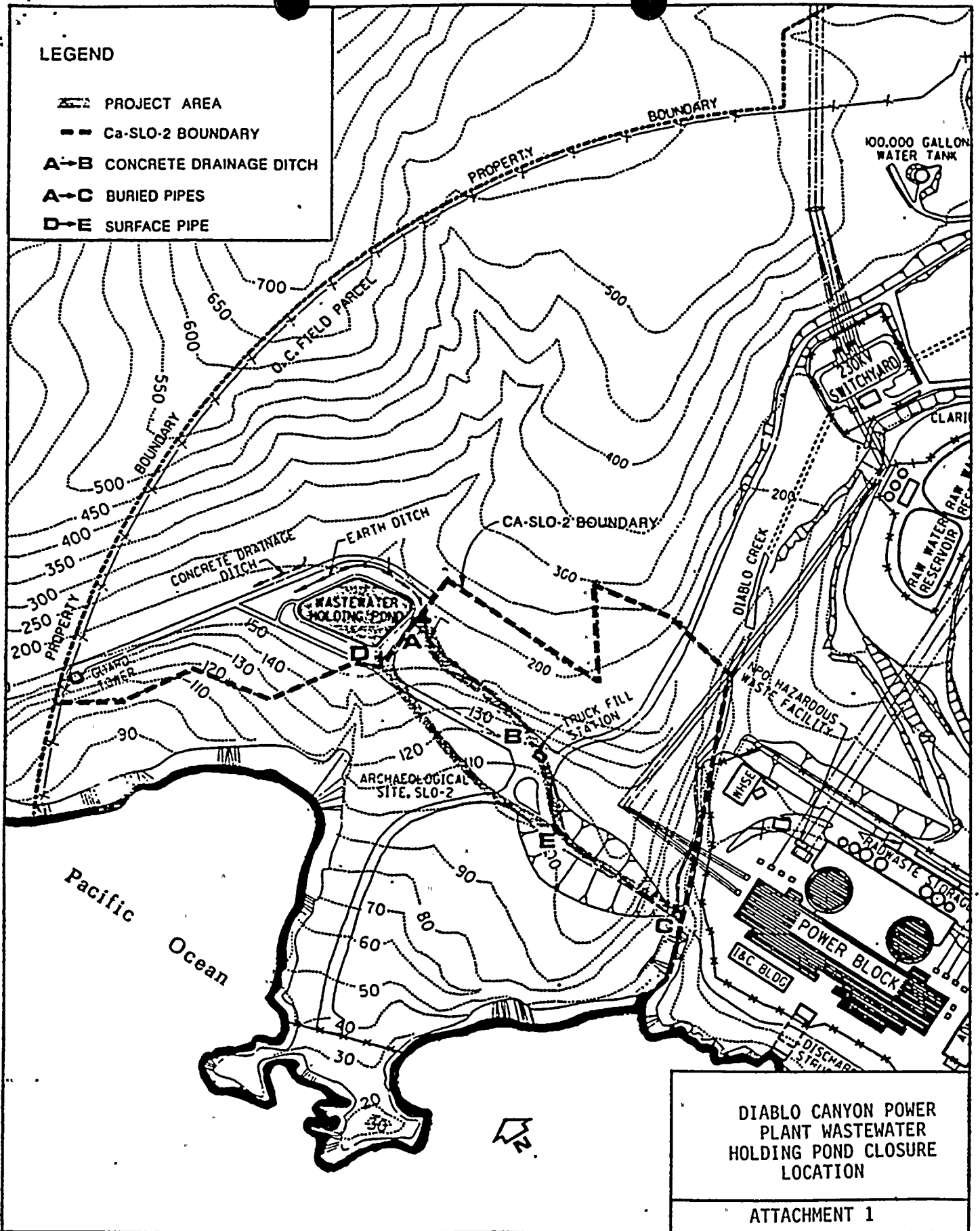
ATTACHMENTS



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LEGEND

-  PROJECT AREA
-  Ca-SLO-2 BOUNDARY
-  A→B CONCRETE DRAINAGE DITCH
-  A→C BURIED PIPES
-  D→E SURFACE PIPE



**DIABLO CANYON POWER
PLANT WASTEWATER
HOLDING POND CLOSURE
LOCATION**

ATTACHMENT 1



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ATTACHMENT 2

RCRA HAZARDOUS WASTE CLOSURE PLAN
FOR THE WASTEWATER HOLDING POND
AT THE DIABLO CANYON POWER PLANT

All of Sections 1 through 14 are enclosed. Portions of Appendix A and all of Appendix C and Appendix D are not enclosed.

COPY AVAILABLE FROM NRC UPON REQUEST.



11-11-11

April 6, 1988

PG&E Letter No. DCL-88-079



James Pace, Chairman
Santa Ynez Band of Mission Indians
P.O. Box 517
Santa Ynez, CA 93460

Elaine Schneider
Coordinator, Elders' Council
Santa Ynez Band of Mission Indians
P.O. Box 517
Santa Ynez, CA 93460

Mike Zarate
636 Cambridge Drive
Santa Barbara, CA 93111

Lei Lyn Odum
1339 24th St.
Oceano, CA 93445

Dear Ladies and Gentlemen:

Informational Notice: CA-SLO-2 Site Activities

PG&E wishes to inform you of the pending closure of the wastewater holding pond and associated pipes which is scheduled to begin in early May at Diablo Canyon Power Plant. This activity will be conducted adjacent to and within the CA-SLO-2 archaeological site. The closure project is required by the Resource Conservation and Recovery Act (RCRA) of 1976.

In order to meet RCRA pond closure requirements, PG&E jointly developed a RCRA Hazardous Waste Closure Plan for the Wastewater Holding Pond at Diablo Canyon Power Plant in conjunction with the Environmental Protection Agency (EPA), California Department of Health Services (DHS), and the California Regional Water Quality Control Board, Central Coast Region. The Closure Plan, which has been approved by the DHS and EPA, directs PG&E to begin closure activities no later than May 2, 1988 and to complete them within 180 days.



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The approved Closure Plan describes in detail the steps, procedures, and criteria for the following:

1. The physical and chemical testing of pipes, concrete, and subsoils to determine the extent of any contamination and to confirm contamination is not present, and
2. The methods for removal, handling, and disposal of all waste materials that may be hazardous or contaminated, and
3. The archaeological, geological, and health and safety monitoring to be performed during these activities.

Since the pond is located outside the boundaries of SLO-2, those activities which are directly associated with pond closure should not affect the SLO-2 site. However, some limited closure activities associated with the testing and removal of the pipes that lead from the plant to the pond will occur within the boundaries of SLO-2. These activities include the following:

- * Drilling of 11 soil borings,
- * Removing a 16 x 20 ft. Concrete slab from previously disturbed soils,
- * Exposing 1400 ft. of buried pipe within previously disturbed soils,
- * Hydrotesting the pipes in place to locate leaking joints,
- * Removing the pipes,
- * Collection initial soil samples for analysis to determine soil contamination,
- * Removing contaminated soil as necessary.

As required by the Environmental Protection Plan of the Nuclear Regulatory Commission (NRC) operating licenses, PG&E plans to conduct these activities in a manner which will avoid disturbances to the SLO-2 site.

The approved Closure Plan requires 11 borings to be drilled to determine background soil constituent levels for determining the degree and extent of any contamination in those places where leaks may have occurred. These borings will be located in order to assure that there is no significant impact to the SLO-2 site. Each soil boring will be six inches in diameter and approximately 30 ft. deep. Four of the borings will be located in the road bed adjacent to Diablo Creek in sterile soils below the strata of existing archaeological deposits. The other seven borings will be initiated in previously disturbed soils along existing roads or in the fill cap. Some portions of these small diameter borings will penetrate previously undisturbed soils. In accordance with the Closure Plan, a professional archaeologist will monitor the borings as well as all other activities which must be conducted within the SLO-2 site.



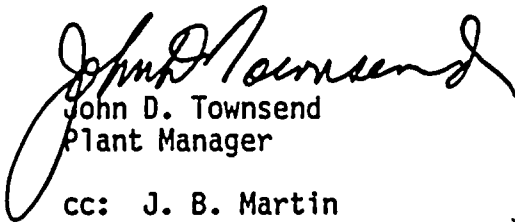
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April 6, 1988

During hydrotesting, PG&E may find some leaks in the pipes that traverse SLO-2. In this event, PG&E will perform soil sampling and analysis to assess the degree and extent of any soil contamination. If the extent of any contamination appears to significantly intrude into undisturbed soil, PG&E will consult with the NRC and the California State Office of Historic Preservation prior to proceeding.

As we have in the past, we would like to meet with you to discuss this project. Our ethnographic consultant, Dr. Clyde Woods, will contact you in the next few days for this purpose. A site visit can be arranged at your request.

Sincerely,



John D. Townsend
Plant Manager

cc: J. B. Martin
P. P. Narbut
H. Rood

Dwight Dutschke
Kathryn Gualtieri
Larry Myers
John Sespe, Commissioner

April 25, 1988

PG&E Letter No. DCL-88-103



Ms. Kathryn Gualtieri
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Ms. Gualtieri:

Surface Impoundment Closure Project

On April 6, 1988 PG&E staff met with Rob Jackson and Dwight Dutschke of your office to discuss closure of the wastewater holding pond (WHP) at Diablo Canyon Power Plant. The closure project is required by the Resource Conservation and Recovery Act of 1976, and is scheduled to begin May 2, 1988. A complete description of the closure was given to your staff during the meeting.

Since the WHP closure will occur adjacent to and within the boundary of archaeological site CA-SLO-2, the project will comply with agreements under the NRC operating licenses for Diablo Canyon Power Plant. The Environmental Protection Plan of the operating licenses contains specific provisions that restrict activities on the CA-SLO-2 site. These provisions and other considerations resulted in a "no effect" determination for the site by your office.

The initial phase of closure work will assess the extent of soil contamination, and will consist of the following activities:

1. Twelve soil borings, each measuring 6 inches in diameter and 30 feet deep, will be drilled to determine background soil constituent levels. Four of the borings will occur in a deep road cut that lies in sterile soil well below midden. The remaining 8 borings will be initiated in the fill cap that covers the center of the site.
2. Buried pipe will be exposed, and hydrostatic testing performed to determine presence of leaks in the pipes. This work will occur in previously disturbed soils.
3. Testing of soils will occur under any pipe leaks to determine soil contamination. Small samples of soil will be removed from beneath the pipes with a hand-held trowel.

The proposed work on the CA-SLO-2 site involves minimal disturbance of original ground surface. Based on our knowledge of the site, none of the work will occur in known archaeological deposits. All work will be monitored by a professional archaeologist. If cultural



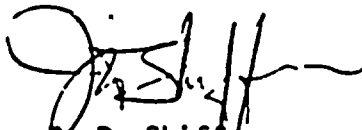
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April 25, 1988

materials are exposed from any of these activities, work will cease at that location, and we will notify your office. The work will not affect the characteristics of the property that qualify it for inclusion on the National Register of Historic Places.

These activities are critical to the closure because they will enable the project engineer to determine the extent of any soil contamination. From this initial phase of work, the total scope of work required for a complete closure will be determined. When we have completed this initial phase of the closure, we will discuss the results of the work with you, and subsequent planned closure activities.

Sincerely,



D. D. Shiffer

cc: James T. Allen, Ph.D.
Chief, Northern California Section
California Department of Health Services
Toxic Substances Control Division
4250 Power Inn Road
Sacramento, CA 95826

Jim Breitlow
U.S. Environmental Protection Agency
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215 Fremont Street
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William R. Leonard
California Regional Water
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J.B. Martin
P.P. Narbut
~~H. Root~~

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