

From: Singal, Balwant
Sent: Monday, February 10, 2020 2:36 PM
To: Soenen, Philippe
Subject: Diablo Canyon Nuclear Power Plant, Units 1 and 2 - Request for Additional Information for Post-Shutdown Decommissioning Activities Report (PSDAR) (EPID L-2019-LRL-0004)

The regulation 10 CFR 50.82(a)(4)(i) states that the licensee shall submit a Post-Shutdown Decommissioning Activities Report (PSDAR) to the U.S. Nuclear Regulatory Commission (NRC) that includes “a discussion that provides the reasons for concluding that the environmental impacts associated with site-specific decommissioning activities will be bounded by appropriate previously issued environmental impact statements.” The regulation 10 CFR 50.82(a)(6) states, in part, that “[l]icensees shall not perform any decommissioning activities ... that ... [r]esult in significant environmental impacts not previously reviewed” In NUREG-0586, “Generic Environmental Impact Statement [GEIS] on Decommissioning of Nuclear Facilities: Supplement 1, Regarding the Decommissioning of Nuclear Power Reactors,” the NRC evaluated the environmental impacts during the decommissioning of nuclear power reactors. The decommissioning GEIS concludes that:

For those issues that have been determined to be generic, licensees may proceed with the decommissioning activity without further analysis provided that the impacts resulting from those activities fall within the range of impacts as described in Chapter 4. However, if the impacts of an activity fall outside the range predicted in Chapter 4, or if the activity results in impacts to environmental issues not considered in this Supplement, or if the impact involves an environmental issue determined to be conditionally site-specific as defined above, then the activity cannot be performed until a further site-specific analysis is completed along with a license-amendment request and NRC has approved the license amendment (the license amendment request will provide an opportunity for a public hearing).

The NRC staff has reviewed Pacific Gas and Electric Company’s (PG&E’s) submittal of the subject report dated December 4, 2019 (ADAMS Accession No. ML19338F173), and determined that the following additional information is required to enable the NRC staff to make an independent assessment regarding its technical review:

1. The Diablo Canyon Nuclear Power Plant, Units 1 and 2 (Diablo Canyon) PSDAR states that PG&E plans to modify an existing rail yard, the Pismo Beach Rail Yard, to support transport of waste offsite during decommissioning. The Pismo Beach Rail Yard improvements were not considered in the PSDAR environmental evaluation. The PSDAR further states that in accordance with 10 CFR 50.82(a)(4)(i), PG&E will verify that the proposed Pismo Beach Rail Yard improvements to support decommissioning activities are bounded by previously issued environmental impact statements.
 - a. Provide a basis for determining that the Pismo Beach Rail Yard improvement activities are beyond the scope of the PSDAR and do not require consideration in the PSDAR’s environmental evaluation.
 - b. Have the environmental impacts of the Pismo Beach Rail Yard improvement activities been considered and/or documented in previously issued environmental impact statements? If so, please provide full citations to such documents and provide a discussion supporting the conclusion that all reasonably foreseeable impacts from the improvement project are bounded.

- c. Clarify the timeframe for initiating and completing the proposed rail yard improvements.
2. The PSDAR states that PG&E has determined that onsite land to be used to support decommissioning activities has been previously disturbed. To support the new power load requirements, PG&E will use approximately 10 miles of existing transmission lines and will install approximately 6 miles of new 12-kV distribution line. Will undisturbed land be affected to support the new power load requirements? Identify (number of acres and location) any new land that would be permanently or temporarily disturbed.
 3. The decommissioning GEIS (NUREG-0586, Supplement 1), states that noise levels below 60 to 65 dBA are considered to be insignificant and that the sources of noise would be sufficiently distant from critical receptors outside the plant boundaries that the noise would be attenuated to ambient levels and therefore scarcely noticeable. The PSDAR identifies that offsite power supply modifications will require helicopter support and the effective perceived noise level for the helicopter can range from 80-100 decibels. Identify (if any) nearby sensitive noise receptors (residents, schools, hospitals), and discuss PG&E's basis for concluding that the noise levels that can range from 80-100 decibels are not expected to present an audible intrusion to the nearby sensitive noise receptors.
 4. On September 18, 2009, the National Marine Fisheries Service (NMFS) issued a biological opinion under the authority of the Endangered Species Act of 1973, as amended (ESA), for Diablo Canyon (ADAMS Accession No. ML063000348). The opinion pertains to four species of sea turtles: green (*Chelonia mydas*), leatherback (*Dermochelys coriacea*), loggerhead (*Caretta caretta*), and olive ridley (*Lepidochelys olivacea*). The opinion allows for the incidental take of specified numbers of these species subject to PG&E's adherence to three reasonable and prudent measures (RPMs) and nine terms and conditions (T&Cs). Please explain how PG&E will continue to adhere to these RPMs and T&Cs during the decommissioning period.
 5. In addition to sea turtles, the federally endangered black abalone (*Haliotis cracherodii*) occurs in Diablo Canyon's intake and discharge coves and nearby waters. The surrounding intertidal zone is also designated as critical habitat for this species. The federally threatened southern sea otter (*Enhydra lutris nereis*) also occurs in intake and discharge coves. PG&E states in its PSDAR (p. 34) that:

Direct and indirect impacts to these protected species may occur during demolition of the discharge structure, including direct mortality of individual species, as well as impacts from runoff, sedimentation, dust generation, or noise disturbance.

Causing injury to or mortality of federally listed species is strictly prohibited under Section 9 of the ESA. Please explain how PG&E would obtain the necessary permits under either ESA Section 7 or ESA Section 10 to exempt the incidental take of these species during the decommissioning period.

Draft request for additional information (RAI) was transmitted to you via email on January 28, 2020. RAI clarification call was held on February 10, 2020. It was agreed that PG&E will provide their response to the RAIs within 30 days from the date of this email.

Thanks.

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