



Trevor D. Rebel
Manager, Environmental Protection

Diablo Canyon Power
Plant Mail code 104/5/519
P.O. Box 56
Avila Beach, CA 93424

805.441.5435
Trevor.Rebel@pge.com

PG&E Letter DCL-24-047

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Power Plant, Units 1 and 2
2023 Annual Nonradiological Environmental Operating Report

Dear Commissioners and Staff,

Enclosed is the 2023 Annual Nonradiological Environmental Operating Report for Diablo Canyon Power Plant, Units 1 and 2. This report is being submitted in accordance with Subsection 5.4.1 of the Environmental Protection Plan, Appendix B of Facility Operating License Nos. DPR-80 and DPR-82.

Pacific Gas and Electric Company makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If you have questions concerning this report, please contact me at (805) 441-5435.

Sincerely,

Trevor D. Rebel

5-1-2024

Date

armb/50941710

Enclosure

cc: Diablo Distribution
cc/enc: Mahdi O. Hayes, Senior Resident Inspector
Matthew T. Keeling, Executive Officer, Central Coast Regional Water Quality Control Board
Samson S. Lee, NRR Project Manager
John D. Monninger, NRC Region IV Administrator

**2023 ANNUAL NONRADIOLOGICAL ENVIRONMENTAL
OPERATING REPORT
DIABLO CANYON POWER PLANT, UNITS 1 AND 2**

Pacific Gas and Electric Company
April 2024

1. Introduction

Pacific Gas and Electric Company (PG&E) has prepared the 2023 Annual Nonradiological Environmental Operating Report in accordance with the Environmental Protection Plan (EPP), which is Appendix B of Facility Operating License Nos. DPR-80 and DPR-82 for Diablo Canyon Power Plant (DCPP), Units 1 and 2, respectively. The report describes implementation of the EPP per the routine reporting requirements of EPP Subsection 5.4.1. PG&E remains committed to minimizing the environmental impact of operating DCPP.

2. Environmental Monitoring

2.1. Aquatic Issues

Aquatic issues are addressed by the effluent limitations and receiving water monitoring/reporting requirements contained in the DCPP National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit includes applicable requirements of the California State Water Resources Control Board's Ocean Plan and Thermal Plan.

2.1.1. Routine Influent and Effluent Monitoring

During 2023, DCPP submitted quarterly NPDES reports containing routine influent and effluent monitoring data and permit compliance summaries to the Central Coast Regional Water Quality Control Board (CCRWQCB). The reports were submitted electronically during the month following the end of each calendar quarter via the California Integrated Water Quality System (CIWQS), an internet database application. DCPP also submitted an annual NPDES report for 2023 to the CCRWQCB in February 2023 via the CIWQS application. The annual report contained monitoring data summaries in tabular and graphical form, and a summary of permit compliance and corrective actions, as applicable, for 2023.

2.1.2. Receiving Water Monitoring Program (RWMP)

The NPDES RWMP, required by the CCRWQCB, included the ecological monitoring, temperature measurements, and State Mussel Watch activities.

Environmental monitoring programs have recorded biological changes in the discharge area since plant start-up. These programs monitor intertidal and subtidal communities of invertebrates, algae, and fish in the discharge cove and at stations north and south of DCPP. During 2023, environmental monitoring continued under the revised RWMP. The revised RWMP continued historical monitoring tasks, including

temperature monitoring, State Mussel Watch activities, and intertidal and subtidal surveys (with additional stations and increased sampling frequencies).

DCPP submitted the “NPDES Receiving Water Monitoring Program: 2022 Annual Report” (PG&E Letter No. DCL-2023-512) to the CCRWQCB and the NRC on April 27, 2023. The 2023 Receiving Water Monitoring Program Annual Report will be submitted at the end of April 2024.

During 2021, final resolution of the plant thermal discharge impacts settlement agreement was realized. The settlement addressed impacts on receiving waters from past and ongoing power plant cooling water discharges. Regardless of the thermal discharge impacts settlement resolution, the plant NPDES permit remains under administrative extension, under which current receiving water monitoring requirements remain in effect.

2.1.3. Thermal Effects Study

DCPP submitted the final thermal effects comprehensive assessment report (PG&E Letter No. DCL-98-585) to the CCRWQCB and the NRC in 1998.

2.1.4. 316(b) Studies

DCPP submitted the final 316(b) report, entitled “316(b) Demonstration Report” (PG&E Letter No. DCL-2000-514), to the CCRWQCB and the NRC on March 1, 2000.

2.2. Terrestrial Issues

2.2.1. Herbicide Application and Erosion Control

Herbicides are used as one component of an overall land vegetation management program that includes transmission line corridors and rights-of-way. The company continues to use only herbicides registered by the Environmental Protection Agency and approved by state authorities, and applies them in accordance with all applicable regulations.

Another component of the vegetation management program is mastication. Mastication is utilized to reduce fuel loads, create fire breaks, maintain line clearance, and increase line of sight in rights-of-ways. Mastication is a vegetation management tool that reduces

ground disturbance and is effective at controlling vegetation when used in conjunction with herbicides.

PG&E continues to implement erosion control activities at the plant site and in the high voltage transmission line corridors as part of an overall land management program. These erosion control activities consist of routine maintenance and prevention efforts performed periodically on an as-needed basis,

2.2.2. Preservation of Archaeological Resources

A. CA-SLO-2 Site Management

Archaeological site CA-SLO-2 is managed in compliance with the Archaeological Resource Management Plan (ARMP) and Operating Procedure EV1.ID2. All projects undertaken within site CA-SLO-2, or immediately adjacent, are to be screened following the procedure described in Section 5.4 of EV1.ID2. The review determines if the project constitutes “Current Approved Activities” described in Section 5.2.1(b) and “maintenance” described in Section 5.3.1 of EV2.ID1. If project activities have the potential to affect the archaeological site, a more thorough impact assessment is completed. PG&E would invoke the notification procedure identified in the ARMP if a significant impact to the site was anticipated or occurred inadvertently.

The annual photo-monitoring of CA-SLO-2 was conducted by PG&E Senior Consulting Scientist for Cultural Resources, Mike Taggart, on December 5, 2023. The following is a summary of the methods and results presented in the *2023 CA-SLO-2 Monitoring Memorandum* (Taggart 2024).

The portions of site CA-SLO-2 located away from the coastal bluff and road cuts are stable, with no observed erosion or other significant changes since the last monitoring event. Significant storms in January 2023 caused minor slumping on the face of the steep northern road cut in Area 1A and the soldier pile wall kept most material off the road. By December 2023, the road cut appeared stable with vegetation reestablished where slumping occurred in January.

Natural erosion within subunits of Area 3 has continued gradually and was punctuated during significant storms, although no attempt to quantify the rate or spatial extent was made. Increased erosion around the Fields Cove stairs in the northern margin of 3A in January 2023 prompted safety concerns and a proposal establish an alternative means of accessing the cove for water quality monitoring. There is no

sign of impacts from the alternative pedestrian access with fall protection down to the cove.

Signs of overland vehicle travel were noted northeast of Area 3A, running for a distance of approximately 40 feet off of the established roadway. The tracks lead to an instrument that should be accessed by foot per Section 5.1.1 of EV1.ID2, which restricts vehicles to established roads within CA-SLO-2. No artifacts or other cultural material were noted in or near the traveled path. Corrective action was initiated with SAP notification 51222962 to eliminate further overland travel. The prohibition was also directly communicated to work groups at DCPD that require access within CA-SLO-2. Cones and white chain have been at the location until K-rails can be put into place to block vehicular access.

No other notable events, projects, or ARMP compliance tasks related to the management of CA-SLO-2 occurred in 2023.

B. Northern Chumash Correspondence

There were no requests from Northern Chumash tribal representatives to access the CA-SLO-2 site in 2023. However, PG&E continued outreach with tribal representatives regarding License Renewal for DCPD, permitting, and ongoing stewardship of cultural resources.

Mike Taggart and Kelly Kephart met with members of yak tityu tityu yak titihini (YTT) Tribe on the Diablo Canyon South Ranch on September 28, 2023, in relation to the Cal Poly archaeological field class previously held at CA-SLO-585.

Outreach was conducted in connection the DCPD License Renewal Project and the proposed Intake Dredging Project. Communication with tribes identified by the California Native American Heritage Commission included letters emailed to representatives introducing the separate projects and soliciting input. Letters were followed with additional communication to confirm receipt and provide another opportunity for comment. Tribes that responded with interest in the projects include the Northern Chumash Tribal Council (NCTC), Santa Ynez Band of Chumash Indians, and YTT. The DCPD Environmental team hosted a virtual meeting over Teams with representatives from the NCTC on November 11, 2023. License Renewal and planning for future Decommissioning were discussed.

PG&E's Senior Consulting Scientist for Cultural Resources continues to serve as a primary point of contact for engagement with tribes concerning management of CA-SLO-2.

3. Unusual or Important Environmental Events

There were no unusual or important environmental events during 2023.

4. Plant Reporting Requirements

4.1. EPP Noncompliance

There were no EPP noncompliances during 2023.

4.2. Changes In Station Design

There were no changes in plant design or operation, tests, or experiments that involved an unreviewed environmental question or a change to the EPP.

4.3. Nonroutine Reports

There were no nonroutine events during 2023 per the EPP; therefore, no nonroutine reports were submitted to the NRC.