

**Supplemental Environmental Impact  
Statement  
Scoping Process**

**Summary Report**

**Diablo Canyon Nuclear Power Plant, Units  
1 and 2 License Renewal Application  
San Luis Obispo County, California**

**September 2024**



**U.S. Nuclear Regulatory Commission  
Rockville, Maryland**

## Introduction

By letter dated November 7, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23311A154), Pacific Gas and Electric Company (PG&E) submitted to the U.S. Nuclear Regulatory Commission (NRC) an application for renewal of Facility Operating License Nos. DPR-80 and DPR-82 for Diablo Canyon Nuclear Power Plant, Units 1 and 2 (Diablo Canyon), respectively, pursuant to Section 103 of the Atomic Energy Act of 1954, as amended, and Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54, "Requirements for renewal of operating licenses for nuclear power plants." Diablo Canyon is located in San Luis Obispo County, California. In its application, PG&E requested the renewal of the Diablo Canyon operating licenses for an additional 20-year period beyond their current expiration dates. Therefore, the new expiration dates, if approved, would be November 2, 2044, and August 26, 2045, for Diablo Canyon Units 1 and 2, respectively.

The purpose of this report<sup>1</sup> is to provide a concise summary of the determinations and conclusions reached, including the significant issues identified, related to the scope of the NRC staff's environmental review of the Diablo Canyon license renewal (LR) application, incorporating stakeholder input. This report briefly summarizes the issues identified by the environmental scoping process and is structured in four sections:

- A. The Diablo Canyon Public Scoping Period
- B. The Scoping Process and Objective
- C. Summary of Comments Provided
- D. Determinations and Conclusions

Appendix A to this report contains a list of commenters on the scope of the NRC staff's environmental review, and Appendix B to this report contains an analysis of the comments received from those commenters during the scoping period.

### A. The Diablo Canyon Public Scoping Period

The Diablo Canyon LR application and all other publicly available documents relevant to Diablo Canyon license renewal are available online in the NRC's ADAMS Public Documents collection at <https://www.nrc.gov/reading-rm/adams.html>. To begin the search, select "Begin Web-based ADAMS Search." For problems with ADAMS, please contact the NRC's Public Document Room (PDR) reference staff by telephone at 1-800-397-4209 or 301-415-4737, or by email at [PDR.Resource@nrc.gov](mailto:PDR.Resource@nrc.gov). For additional information, please see <https://www.nrc.gov/reactors/operating/licensing/renewal/applications/diablo-canyon.html>. This public website includes application information, the license renewal review schedule, opportunities for public involvement, and other relevant information. Finally, documents related to the Diablo Canyon LR application are also available at the Federal rulemaking website, <https://www.regulations.gov/>, under Docket ID NRC-2023-0192.

PG&E included an environmental report (ER) as Appendix E to the Diablo Canyon LR application. PG&E prepared the ER in accordance with 10 CFR Part 51, "Environmental protection regulations for domestic licensing and related regulatory functions," which contains the NRC's requirements for implementing the National Environmental Policy Act of 1969, as

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<sup>1</sup> The NRC's requirements for conducting the scoping process and for preparing a scoping summary report are at 10 CFR 51.29, "Scoping-environmental impact statement and supplement to environmental impact statement."

amended (NEPA). The NRC staff conducted a scoping process to gather information, in addition to that in the ER, necessary to prepare a supplemental environmental impact statement (SEIS) to evaluate the environmental impacts of the proposed action of Diablo Canyon LR.

PG&E had previously submitted an LR application and ER for Diablo Canyon on November 23, 2009 (ML093340086). As part of its review of this prior application, in 2010, the NRC staff published in the *Federal Register* (FR) a notice of intent (NOI) to conduct the scoping process and solicited public comments (75 FR 4427) and subsequently reopened the scoping process in 2015 (80 FR 37664). The comments received during these periods are outlined in an environmental scoping summary report dated March 2016 (ML16077A091) and were considered as part of the NRC staff's environmental review at that time. The NRC staff granted PG&E's request to withdraw this prior application and all associated correspondence and commitments effective April 23, 2018 (83 FR 17688). To the extent that the scoping comments on the prior application remain applicable to the current LR application, the NRC staff considered them during the current scoping process.

## **B. The Scoping Process and Objectives**

On January 24, 2024, the NRC staff published an NOI to conduct the scoping process and to prepare a SEIS for the Diablo Canyon LR application (89 FR 4631). The NOI informed the public about the NRC staff's intent to prepare the SEIS as a supplement to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants—Final Report" (LR GEIS), and provided the public with an opportunity to participate in the scoping process. Specifically, the NRC staff sought public comment on the appropriate scope of its environmental review and requested this input by February 23, 2024. In addition to written comments, oral comments were accepted at two public meetings. The first public meeting was held virtually on February 1, 2024, and the second public meeting was held in-person on February 8, 2024, in San Luis Obispo, California. All comments, both written and oral, were considered in the scoping process.

The scoping process provided an opportunity for members of the public to propose environmental issues to be addressed in the SEIS and to highlight public concerns and issues. In accordance with 10 CFR 51.29(b), this scoping summary report provides a concise summary of the determinations and conclusions reached, including the significant issues identified. The objectives of the scoping process were to:

- Define the proposed action that is to be the subject of the SEIS.
- Determine the scope of the SEIS and identify the significant issues to be analyzed in depth.
- Identify and eliminate from detailed study issues that are peripheral or are not significant or which have been covered by prior environmental review.
- Identify any environmental assessments and other environmental impact statements that are being or will be prepared that are related to but are not part of the scope of the SEIS.
- Identify other environmental review and consultation requirements related to the proposed action.

- Indicate the relationship between the timing of the preparation of the environmental analyses and the Commission's tentative planning and decision-making schedule.
- Identify any cooperating agencies and, as appropriate, allocate assignments for preparation and schedules for completion of the SEIS to the NRC and any cooperating agencies.
- Describe the means by which the SEIS will be prepared, including any contractor assistance to be used.

The NRC staff's determinations and conclusions regarding the above objectives are provided in Section D below.

### **C. Summary of Comments Provided**

Table A-1 in Appendix A to this report provides a list of commenters who provided comment submissions (i.e., non-form letter submissions) during the scoping comment period, identified by name, affiliation (if stated), the assigned correspondence identification (ID) number, the comment source, and the ADAMS Accession Number of the source. The NRC staff reviewed each comment submission, including the public scoping meeting transcripts, to identify individual comments. Each comment was marked with a unique identifier consisting of the correspondence ID (specified in Table A-1) and a comment number. For example, Comment 3-1 refers to the first comment within the document with correspondence ID 3. This unique identifier allows each comment to be traced back to the source where the comment was identified. Comments were consolidated and categorized according to resource area or topic. Table A-2 in Appendix A to this report identifies the distribution of comments received by resource area or topic.

A summary of the comments and the NRC staff's responses to the comments are provided in Appendix B to this report. Comments were grouped based on being in scope or out of scope, and comments with similar themes were further sub-grouped to capture the resources concerned. Each comment submittal was uniquely identified and when a submittal addressed multiple issues, the submittal was further divided into separate comments with tracking identifiers.

### **D. Determinations and Conclusions**

#### *(1) Define the proposed action*

The NRC's Federal action is to decide whether to renew the operating licenses for Diablo Canyon for an additional 20 years.

#### *(2) Determine the scope of the SEIS and identify the significant issues to be analyzed in depth*

The environmental consequences related to the proposed action include: (1) impacts associated with Diablo Canyon continued operations and refurbishment activities similar to those that have occurred during the terms of the current licenses; (2) impacts of reasonable alternatives to the proposed action; (3) impacts from the termination of nuclear power plant operations and decommissioning after the license renewal term (with emphasis on the incremental effect caused by an additional 20 years of operation); (4) impacts associated with the uranium fuel

cycle; (5) impacts of postulated accidents (design basis accidents and severe accidents); (6) cumulative effects of the proposed action; and (7) resource commitments associated with the proposed action, including unavoidable adverse impacts, the relationship between short-term use and long-term productivity, and irreversible and irretrievable commitment of resources. The significant issues identified in this report will be considered in the development of the draft SEIS, in accordance with 10 CFR 51.29 and 10 CFR 51.70, "Draft environmental impact statement—general." The NRC staff also follows guidance in NUREG-1555, Supplement 1, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants: Operating License Renewal," to ensure compliance with all applicable regulations and NRC policies and procedures.

The NRC staff delineated and grouped comments received according to resource area/topic (see Appendices A and B). The comments will be addressed in the SEIS, as appropriate, as discussed in Appendix B to this report. The NRC staff reviewed all comments received and categorized each as general in nature, outside of the scope of license renewal, or within the scope of license renewal. The NRC staff considered all relevant within-scope comments as part of this review. With respect to greenhouse gas emissions and climate change, the NRC staff will consider the impacts of the proposed action of Diablo Canyon LR on climate change as well as the impacts of climate change on environmental resources (e.g., air quality, water resources) that may be directly impacted by the proposed action. In addition, the NRC staff will describe, in Chapters 2 and 3 of the SEIS, the following topics generally mentioned in the scoping comments:

- Accidents-SAMAs
- Alternatives-No-Action
- Alternatives-Replacement Power
- Cumulative Impacts
- Ecology-Aquatic Resources
- Ecology-Terrestrial Resources
- Environmental Justice
- Federal Protected Ecological Resources
- General Environmental Concerns
- Geologic Environment
- Historic and Cultural Resources
- Human Health-Nonradiological
- Human Health-Radiological
- Hydrology-Surface Water Resources
- Land Use and Visual Resources
- Meteorology and Air Quality
- Process-Licensing Action
- Process-NEPA
- Socioeconomics
- Uranium Fuel Cycle
- Waste Management-Radioactive Waste

*(3) Identify and eliminate from detailed study issues that are peripheral or are not significant or that have been covered by prior environmental review*

As noted in Appendices A and B to this report, the NRC staff received several comments that were either general in nature or otherwise outside the scope of the license renewal environmental review. These included comments from organizations and individuals generally in support of or in opposition to the proposed action of Diablo Canyon LR. Additionally, plant-specific design bases are not re-evaluated as part of license renewal. Site-specific environmental conditions are considered when originally siting nuclear power plants. This includes the consideration of meteorological and hydrologic siting criteria, including Probable Maximum Precipitation (PMP) criteria, as set forth in 10 CFR Part 100, "Reactor Site Criteria." NRC regulations also require that plant structures, systems, and components important to safety be designed to withstand the effects of natural phenomena, such as earthquakes and flooding, without loss of capability to perform their safety functions. Further, nuclear power plants are required to operate within technical specifications in accordance with the NRC operating license, including coping with natural phenomena hazards. The NRC conducts safety reviews prior to allowing licensees to make operational changes due to changing environmental conditions. Finally, the NRC evaluates nuclear power plant operating conditions and physical infrastructure to ensure ongoing safe operations through its Reactor Oversight Process. If new information about changing environmental conditions becomes available, the NRC will evaluate the new information to determine whether any safety-related changes are needed. In sum, the NRC staff will not consider or evaluate any issues in the SEIS that do not pertain to the staff's environmental evaluation or are beyond the scope of the license renewal review. Comments that have been designated as out of scope are identified in Appendix B to this report.

*(4) Identify any related Environmental Assessments and Other Environmental Impact Statements*

Previously completed environmental impact statements will be used in the preparation of the Diablo Canyon license renewal SEIS, as appropriate, including portions of the LR GEIS, Revision 0 (1996) (ML040690705, ML040690738); the LR GEIS, Revision 1 (2013) (ML13107A023); and the LR GEIS, Revision 2 (2024) (ML24087A133). By letter dated March 9, 2022, PG&E submitted to the NRC an application for renewal of special nuclear material (SNM) License No. SNM-2511 for the Diablo Canyon independent spent fuel storage installation for an additional 40 years (ML22068A189). The NRC staff is currently conducting an environmental review of that application in accordance with 10 CFR Part 51.

*(5) Identify Other Environmental Review and Consultation Requirements*

Concurrent with its NEPA review, the NRC staff is consulting with the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS), as appropriate, under Section 7 of the Endangered Species Act of 1973 (ESA) to evaluate the potential impacts of the proposed action of Diablo Canyon LR on endangered and threatened species and their critical habitat. Consistent with 36 CFR 800.8(c), the NRC staff is also consulting with affected Indian Tribes, the California Office of Historic Preservation, and the Advisory Council on Historic Preservation to fulfill its Section 106 obligations under the National Historic Preservation Act of 1966.

*(6) Indicate the relationship between the timing of the preparation of environmental analyses and the Commission's tentative planning and decision-making schedule*

The NRC staff plans to issue a draft SEIS for public comment in October 2024. The 45-day comment period will offer an opportunity for participants, such as the applicant; interested Federal, State, and local government agencies; Tribal governments; local organizations; and

members of the public to provide further input to the agency's environmental review process. Comments on the draft SEIS will be considered in the preparation of the final SEIS, which the NRC staff anticipates issuing in June 2025. The NRC staff is completing its safety review and will document its safety findings in a safety evaluation report (SER), which is anticipated in June 2025. The findings in the SEIS and the SER will be considerations in the NRC's decision regarding whether to renew the operating licenses for Diablo Canyon for an additional 20 years.

*(7) Identify any Cooperating Agencies*

During the scoping process, the NRC staff did not identify any Federal, State, local or Tribal agencies as cooperating agencies for this SEIS.

*(8) Describe the means by which the environmental impact statement will be prepared, including any contractor assistance to be used*

Upon completion of the scoping process, the NRC staff will compile its findings in a draft SEIS. The draft SEIS will be made available for public comment. Once the public comment period is complete, the NRC staff will revise the draft SEIS, as appropriate, and will prepare and publish a final SEIS. Finally, the NRC will prepare and provide a Record of Decision in accordance with 10 CFR 51.102 and 10 CFR 51.103. As a contractor to the NRC, Pacific Northwest National Laboratory is providing technical support throughout the development of the SEIS in addition to technical editing and document production tasks.

## Appendix A

### List of Commenters

**Table A-1. Individuals Providing Comments During the Scoping Comment Period**

<b>Commenter</b>	<b>Affiliation (if provided)</b>	<b>Correspondence ID</b>	<b>Comment Source</b>	<b>ADAMS Accession Number</b>
Schwarz, Robert		1-1	Email	ML24025A140
Piper, Derrell		2-1	Email	ML24025A154
Rochte, Tim		3-1	Email	ML24029A290
Cochran, June		4-1	Email	ML24031A640
Russom, Caren Ray	Arroyo Grande City Council	5-1	Email	ML24035A001
Marderosian, Ara	Sequoia ForestKeeper	6-1	Email	ML24050A003
Taylor, Edward		7-1	Email	ML24037A329
Spotts, Richard		8-1	reg.gov	ML24030A037
ZamEk, Jill		9-1	reg.gov	ML24038A403
Winholtz, Betty		10-1	Email	ML24040A000
Goetz, Tony		11-1	Email	ML24040A001
Oakley, Benjamin		12-1	Email	ML24040A002
Kravchinsky, Laird		13-1	Email	ML24040A003
ZamEk, Jill		14-1	Email	ML24041A001
Banks, Tony		15-1	Email	ML24042A002
Nelson, Gene	Californians for Green Nuclear Power	16-1	Email	ML24043A140
Mercer, Kristen		17-1	Email	ML24046A021
Becker, Linda		18-1	Email	ML24046A022
Battat, Kathy		19-1	Email	ML24047A097
Pomerantz, Ron		20-1	Email	ML24047A098
Linney, Joan		21-1	Email	ML24050A004
Taylor, Joan		22-1	Email	ML24051A105



<b>Commenter</b>	<b>Affiliation (if provided)</b>	<b>Correspondence ID</b>	<b>Comment Source</b>	<b>ADAMS Accession Number</b>
Hisasue, Carol		23-1	Email	ML24052A363
Elvin, Mark	U.S Fish & Wildlife Service	24-1	Email	ML24053A019
Unknown	Fission Transition	25-1	reg.gov	ML24046A079
Martin, Ronald		26-1	Email	ML24052A362
Weed-Pomerantz, Jane		27-1	Email	ML24053A022
Pierson, Lucy		28-1	Email	ML24053A415
Highfill, Debbie		29-1	Email	ML24053A416
Everett, Patricia		30-1	reg.gov	ML24054A003
Hafley-Kluver, Haila		31-1	reg.gov	ML24054A004
Smith, Andrew	American Nuclear Society	32-1	Email	ML24054A005
Wells, Gerard		33-1	Email	ML24054A016
Stewart, Jim		34-1	Email	ML24054A110
Van Fleet, Linda		35-1	reg.gov	ML24054A444
Ortiz-Legg, Dawn	County of San Luis Obispo	36-1	Email	ML24054A848
Howard, Dolores		37-1	Email	ML24054A849
Abernathy, William		38-1	Email	ML24054A850
Campbell, Bruce		39-1	Email	ML24054A851
Campbell, Bruce		40-1	Email	ML24055A002
Ullcott, John		41-1	Email	ML24055A003
Feher, Rick		42-1	Email	ML24055A004
Terwilliger, John		43-1	Email	ML24056A001
Vujovich-LaBarre, Mila	Sierra Club	44-1	reg.gov	ML24053A143
Bender, David		45-1	reg.gov	ML24055A004
Brown, Tony	Nuclear Energy Institute	46-1	reg.gov	ML24058A005
Nelson, Chloe	U.S. Environmental Protection Agency	47-1	reg.gov	ML24058A006

<b>Commenter</b>	<b>Affiliation (if provided)</b>	<b>Correspondence ID</b>	<b>Comment Source</b>	<b>ADAMS Accession Number</b>
Kubitz, Kermit		48-1	reg.gov	ML24058A007
Kohlen, Patricia		49-1	Email	ML24108A053
McAdams, Allison	Santa Ynez Band of Chumash Indians	50-1	Email	ML24108A054
Gibbons, Tori	yak tityu tityu yak tilhini Northern Chumash Tribe	51-1	Email	ML24109A029
Russell, Amy	Paso Robles and Templeton Chamber of Commerce	52-1	Meeting Transcript	ML24108A145
Weisman, David	Alliance for Nuclear Responsibility	52-2	Meeting Transcript	ML24108A145
Kelvsen, Dylan	International Brotherhood of Electrical Workers (IBEW) 639	52-3	Meeting Transcript	ML24108A145
Johnson, Jack	IBEW	52-4	Meeting Transcript	ML24108A145
ZamEk, Jill	San Luis Obispo Mothers for Peace	52-5	Meeting Transcript	ML24108A145
Alvarez, Renelle		52-6	Meeting Transcript	ML24108A145
Harmon, Barbara	Former Arroyo Grande Council Member	52-7	Meeting Transcript	ML24108A145
Bohanna, Jordan	IBEW	52-8	Meeting Transcript	ML24108A145
Simental, Jason		52-9	Meeting Transcript	ML24108A145
Brown, Mike		52-10	Meeting Transcript	ML24108A145
Lathrop, Scott	yak tityu tityu yak Tilhini tribe	52-11	Meeting Transcript	ML24108A145
Johnson, Molly	San Luis Obispo Mothers for Peace	52-12	Meeting Transcript	ML24108A145

<b>Commenter</b>	<b>Affiliation (if provided)</b>	<b>Correspondence ID</b>	<b>Comment Source</b>	<b>ADAMS Accession Number</b>
Swanson, Jane	San Luis Obispo Mothers for Peace	52-13	Meeting Transcript	ML24108A145
Heller, Jeff		52-14	Meeting Transcript	ML24108A145
Lewis, Sherry	San Luis Obispo Mothers for Peace	52-15	Meeting Transcript	ML24108A145
Ripley, Ellie		52-16	Meeting Transcript	ML24108A145
Jordan, Randall	Republican Party of San Luis Obispo County	52-17	Meeting Transcript	ML24108A145
Baldwin, David	Local 403 Plumbers and Pipefitters Union	52-18	Meeting Transcript	ML24108A145
Hoff, Heather	Mothers for Nuclear	52-19	Meeting Transcript	ML24108A145
Cooper, Gregg	IBEW 639	52-20	Meeting Transcript	ML24108A145
Conner, Vicki		52-21	Meeting Transcript	ML24108A145
Seastrand, Andrea	Central Coast Taxpayers Association	52-22	Meeting Transcript	ML24108A145
Seeley, Linda	San Luis Obispo Mothers for Peace	52-23	Meeting Transcript	ML24108A145
Singh, Suzanne	Santa Maria Valley Chamber of Commerce	52-24	Meeting Transcript	ML24108A145
Whittaker, David		52-25	Meeting Transcript	ML24108A145
Parks, Linda		52-26	Meeting Transcript	ML24108A145
Triggs, Frank		52-27	Meeting Transcript	ML24108A145
Dodd, Sylvia		52-28	Meeting Transcript	ML24108A145
Hatcher, Lindy	Home Builders Association of the Central Coast	52-29	Meeting Transcript	ML24108A145
Burkhead, Elizabeth		52-30	Meeting Transcript	ML24108A145

<b>Commenter</b>	<b>Affiliation (if provided)</b>	<b>Correspondence ID</b>	<b>Comment Source</b>	<b>ADAMS Accession Number</b>
Spinello, Nina	Cuesta College	52-31	Meeting Transcript	ML24108A145
Klay, Jennifer	Mothers for Nuclear	52-32	Meeting Transcript	ML24108A145
Highfill, Deb		52-33	Meeting Transcript	ML24108A145
Medrano, Joshua	Tri-Counties Building Trades	52-34	Meeting Transcript	ML24108A145
Byrne, Peter		52-35	Meeting Transcript	ML24108A145
Howell, Erik		52-36	Meeting Transcript	ML24108A145
Duffy, Patrick	IBEW 1245	52-37	Meeting Transcript	ML24108A145
Rouleau, Joe		52-38	Meeting Transcript	ML24108A145
Burnham, Chris	IBEW 1245	52-39	Meeting Transcript	ML24108A145
diPeri, Kathi		52-40	Meeting Transcript	ML24108A145
Flom, Michele		52-41	Meeting Transcript	ML24108A145
Becker, Linda		52-42	Meeting Transcript	ML24108A145
Swanson, Jane	San Luis Obispo Mothers for Peace	52-43	Meeting Transcript	ML24108A145
Schalk, Vidya		52-44	Meeting Transcript	ML24108A145
Rouleau, Joe		52-45	Meeting Transcript	ML24108A145
Pease, Andy	City of San Luis Obispo	53-1	Meeting Transcript	ML24108A146
Boswell, Josh	REACH	53-2	Meeting Transcript	ML24108A146
Altergott, Randy		53-3	Meeting Transcript	ML24108A146
Dantona, Jim	San Luis Obispo Chamber of Commerce	53-4	Meeting Transcript	ML24108A146
Hopf, James	Generation Atomic	53-5	Meeting Transcript	ML24108A146
Schroder, Madison	Generation Atomic	53-6	Meeting Transcript	ML24108A146
Osborne, Jenelle	City of Lompoc	53-7	Meeting Transcript	ML24108A146

<b>Commenter</b>	<b>Affiliation (if provided)</b>	<b>Correspondence ID</b>	<b>Comment Source</b>	<b>ADAMS Accession Number</b>
Bausch, Chris	City of Paso Robles	53-8	Meeting Transcript	ML24108A146
Kirkland, Gary		53-9	Meeting Transcript	ML24108A146
Peschong, John	San Luis Obispo County	53-10	Meeting Transcript	ML24108A146
Bird, Peter	Consultant to San Luis Obispo Mothers for Peace	53-11	Meeting Transcript	ML24108A146
Mauer, Andrew	Nuclear Energy Institute	53-12	Meeting Transcript	ML24108A146
Baker, Sheila		53-13	Meeting Transcript	ML24108A146
Severance, Bruce		53-14	Meeting Transcript	ML24108A146
Robert, Robert	City of Grover Beach	53-15	Meeting Transcript	ML24108A146
Nunez, Guido		53-16	Meeting Transcript	ML24108A146
Brennan, Jocelyn		53-17	Meeting Transcript	ML24108A146
Brown, Marty		53-18	Meeting Transcript	ML24108A146
McNally, Alice	Coalition for Nuclear Safety	53-19	Meeting Transcript	ML24108A146
Stewart, Jim		53-20	Meeting Transcript	ML24108A146
Schmidt, Mark		53-21	Meeting Transcript	ML24108A146
Lane, Thomas	Local Union 403	53-22	Meeting Transcript	ML24108A146
Arnold, Debbie	County of San Luis Obispo	53-23	Meeting Transcript	ML24108A146
Kasper, Benjamin		53-24	Meeting Transcript	ML24108A146
Pauls, Karl		53-25	Meeting Transcript	ML24108A146
Burnham, Chris		53-26	Meeting Transcript	ML24108A146
Moreno, Heather	City of Atascadero	53-27	Meeting Transcript	ML24108A146
Bright, Karen	City of Grover Beach	53-28	Meeting Transcript	ML24108A146
Duffy, Patrick	IBEW 1245	53-29	Meeting Transcript	ML24108A146

<b>Commenter</b>	<b>Affiliation (if provided)</b>	<b>Correspondence ID</b>	<b>Comment Source</b>	<b>ADAMS Accession Number</b>
Greening, Eric		53-30	Meeting Transcript	ML24108A146
Severance, Bruce		53-31	Meeting Transcript	ML24108A146
Seely, Linda	San Luis Obispo Mothers for Peace	53-32	Meeting Transcript	ML24108A146
Adam, Peter		53-33	Meeting Transcript	ML24108A146
Viola, Francesco		53-34	Meeting Transcript	ML24108A146
Nelson, Gene		53-35	Meeting Transcript	ML24108A146
Purcell, Leslie		53-36	Meeting Transcript	ML24108A146
Lewis, Sherri	San Luis Obispo Mothers for Peace	53-37	Meeting Transcript	ML24108A146
Martin, Ronald		53-38	Meeting Transcript	ML24108A146
Hoffman, Ace		53-39	Meeting Transcript	ML24108A146
Taylor, Dee		53-40	Meeting Transcript	ML24108A146

**Table A-2. Distribution of Comments by Resource Area or Topic**

<b>Resource Area/Topic</b>	<b>Number of Comments Received</b>
Accidents-SAMAs	3
Alternatives-No-Action	2
Alternatives-Replacement Power	32
Alternatives-System Design	2
Cumulative Impacts	1
Ecology-Aquatic Resources	21
Ecology-Terrestrial Resources	2
Environmental Justice	3
Federal Protected Ecological Resources	2
General Environmental Concerns	11
Geologic Environment	12
Greenhouse Gas Emissions and Climate Change	14
Historic and Cultural Resources	12
Human Health-Nonradiological	1
Human Health-Radiological	2

<b>Resource Area/Topic</b>	<b>Number of Comments Received</b>
Hydrology-Surface Water Resources	13
Land Use and Visual Resources	1
Meteorology and Air Quality	2
Opposition-Licensing Action	40
Outside Scope-Aging Management	25
Outside Scope-Emergency Preparedness	4
Outside Scope-Energy Costs	24
Outside Scope-Miscellaneous	10
Outside Scope-Need for Power	51
Outside Scope-Offsite Fuel Storage	1
Outside Scope-Other Non-LR Actions	15
Outside Scope-Safety	91
Outside Scope-Security	1
Process-Licensing Action	32
Process-NEPA	7
Socioeconomics	23
Support-Licensing Action	88
Uranium Fuel Cycle	1
Waste Management-Radioactive Waste	24

## Appendix B

### Analysis of Comments Received During the Scoping Period

#### B.1 Comments on the Resource Areas

##### B.1.1 Comments Concerning Accidents – Severe Accident Mitigation Alternatives (SAMAs)

**Comment Summary:** Commenters expressed concerns about the general consequences of many types of nuclear accidents and specifically accidents at Diablo Canyon Nuclear Power Plant, Units 1 and 2 (Diablo Canyon), including cost and loss of life.

Comments: (53-11-2) (53-39-3) (53-39-16)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the U.S. Nuclear Regulatory Commission (NRC) staff's review and analysis during the development of the draft supplemental environmental impact statement (SEIS) within the Postulated Accidents resource area and/or supplemental applicable areas.

##### B.1.2 Comments Concerning Alternatives – No-Action

**Comment Summary:** Commenters requested that the NRC staff evaluate both the environmental benefits and impacts of not renewing the licenses for Diablo Canyon.

Comments: (40-6) (53-6-3)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis of the no-action alternative in the draft SEIS.

##### B.1.3 Comments Concerning Alternatives – Replacement Power

**Comment Summary:** Commenters requested that the NRC staff address in the SEIS both the benefits and impacts of alternative energy sources that could be used to replace the power generated by nuclear power in general and by Diablo Canyon in particular. Commenters also noted that the analysis of replacement power alternatives should include renewable or sustainable energy options, energy-efficient measures, and energy storage options.

Comments: (3-2) (7-3) (11-4) (16-5) (19-6) (21-5) (32-6) (32-8) (46-7) (47-3) (52-9-2) (52-32-2) (52-38-1) (52-38-3) (53-3-3) (53-4-1) (53-5-1) (53-13-3) (53-14-2) (53-14-6) (53-15-2) (53-16-3) (53-16-5) (53-17-2) (53-19-9) (53-25-2) (53-26-3) (53-27-5) (53-36-12) (53-36-15) (53-37-3) (53-39-10)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis of replacement power alternatives in the draft SEIS.



#### **B.1.4 Comments Concerning Alternatives – System Design**

**Comment Summary:** Commenters expressed concerns related to the continued operation of Diablo Canyon Unit 1, and discussed considerations related to the potential operation of Unit 2 in isolation.

Comments: (53-14-3) (53-30-1)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the alternatives area and/or supplemental applicable areas.

#### **B.1.5 Comments Concerning Cumulative Impacts**

**Comment Summary:** A commenter requested that the NRC staff conduct a thorough analysis of other past, present, and reasonably foreseeable future cumulative actions potentially impacting the quality of the human environment, including both short- and long-term impacts and focusing on resources of concern.

Comments: (47-16)

**Response:** Consistent with the NRC's NEPA regulations (10 CFR Part 51), the NRC staff will analyze all of the environmental impacts that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action. In Chapter 3 of the draft SEIS, the impacts of the proposed action will be analyzed in conjunction with other past, present, and reasonably foreseeable future actions at Diablo Canyon.

#### **B.1.6 Comments Concerning Ecology – Aquatic Resources**

**Comment Summary:** Several commenters expressed concern about the effect of Diablo Canyon on aquatic resources, including concerns regarding the plant's once-through cooling system and proposed mitigations.

The U.S. Environmental Protection Agency (EPA) stated that the licensee should work with the Central Coast Regional Water Quality Control Board (CCRWQCB) to conduct new impingement and entrainment studies and incorporate ongoing entrainment monitoring during power plant intake operation, as well as consider implementing best available technology and identifying mitigation measures. The EPA also recommended that the draft SEIS describe aquatic habitats in the project area, evaluate impacts to aquatic resources in terms of the aerial or linear extent, and describe the types, location, and estimated effectiveness of best management practices to minimize and mitigate impacts to aquatic resources.

Comments: (6-3) (10-3) (14-6) (37-6) (39-5) (40-4) (44-3) (44-4) (44-5) (44-6) (47-6) (47-7) (52-5-3) (52-24-5) (53-16-2) (53-24-3) (53-30-2) (53-30-7) (53-32-7) (53-36-3) (53-36-4)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the aquatic resources area and/or supplemental applicable areas.

### **B.1.7 Comments Concerning Ecology – Terrestrial Resources**

**Comment Summary:** A commenter provided recommendations for the draft SEIS regarding the prevention of invasive species and avoiding the use of pesticides and herbicides. Another commenter stated that limiting access to lands surrounding Diablo Canyon protects local wildlife.

Comments: (25-5) (47-9)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the terrestrial resources and/or supplemental applicable areas.

### **B.1.8 Comments Concerning Environmental Justice**

**Comment Summary:** A commenter requested that the draft SEIS evaluate potential impacts to environmental justice (EJ) communities in accordance with Executive Orders 12898 and 14096. Specific recommendations included the following:

- Include a robust environmental justice section to analyze potential disproportionate and adverse impacts to minority and low-income populations.
- Use EJScreen or other U.S. Census Bureau data to identify low-income and minority populations.
- Identify the presence of linguistically isolated populations and medically unserved areas.
- Supplement data with state and county level reports and local knowledge.
- Use specific guidance and resources to identify environmental justice communities and evaluate potential effects, including the report of the Federal Interagency Working Group on Environmental Justice and NEPA Committee titled, "Promising Practices for EJ Methodologies in NEPA Reviews."

Another commenter expressed concerns regarding the effects of transportation and storage of radioactive waste on low-income communities and indigenous areas in Oregon, Idaho, and Utah.

Comments: (47-13) (47-20) (53-30-5)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the environmental justice resource area and/or supplemental applicable areas.

### **B.1.9 Comments Concerning Federally Protected Ecological Resources**

**Comment Summary:** The U.S. Fish and Wildlife Service (FWS) recommended that the draft SEIS address threatened species documented in and adjacent to Diablo Canyon: the Southern Sea Otter and the California Red-Legged Frog. The comment submission from the FWS included an enclosure listing measures to avoid or minimize adverse effects to these species. The FWS recommended the incorporation of these measures into the project description in the draft SEIS. See ML24053A019 to view the full text of the submission. The FWS also requested

that the draft SEIS include compensatory mitigation commensurate with the Service's 2023 Mitigation Policy and the Endangered Species Act (ESA) Compensatory Mitigation Policy of no net loss to appropriately offset the adverse effects to the numbers, reproduction, distribution, and recovery of listed species. The FWS also offered to provide additional guidance as needed.

The EPA provided recommendations for draft SEIS content, including identification of species and critical habitat, locations of rare or special status plants, consistency with federal or state species protections, consultations with other agencies, mitigation measures, cumulative impacts to wildlife species, and the project's consistency with existing laws and regulations.

Comments: (24-1) (47-8)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the federally protected ecological resources area and/or supplemental applicable areas.

#### **B.1.10 Comments Concerning General Environmental Concerns**

**Comment Summary:** Several commenters expressed general concerns about public health and safety and environment impacts from continued operation of Diablo Canyon. Other comments noted environmental benefits from continued operation of Diablo Canyon and the good condition of the surrounding environment.

Comments: (13-6) (14-10) (52-6-1) (52-11-2) (52-11-3) (52-23-4) (53-17-3) (53-19-1) (53-31-2) (53-36-1) (53-36-13)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS.

#### **B.1.11 Comments Concerning Geologic Environment**

**Comment Summary:** Commenters expressed concern and requested further description of the geologic environment at Diablo Canyon. Comments noted potential for seismic activity in the area, as the plant is located near geologic faults. Commenters requested that the draft SEIS consider the findings of an updated seismic assessment available for Diablo Canyon and consider the impacts of coastal erosion and landslides.

Comments: (13-2) (14-2) (20-2) (27-4) (34-2) (36-5) (44-13) (47-18) (52-13-1) (52-41-5) (53-11-1) (53-40-1)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the geologic environment resource area and/or supplemental applicable areas.

### **B.1.12 Comments Concerning Greenhouse Gas Emissions and Climate Change**

**Comment Summary:** The EPA recommended that the NRC staff do the following in the draft SEIS:

- Include an analysis of greenhouse gas emissions and climate change impacts, consistent with the Council on Environmental Quality National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change.
- Discuss how climate change could potentially influence the proposed project area, and how the proposed license renewal could worsen, lessen, or potentially mitigate for these impacts.
- Consider anticipated changes to the watershed.
- Include a robust discussion of climate change and its potential effects on the proposed 20-year continuation of plant operations and Diablo Canyon's impacts.

Other commenters expressed concern that shutdown of Diablo Canyon would cause an increase in greenhouse gas emissions due to the use of alternative power sources. Several commenters stated that nuclear power was not carbon-free. Other commenters expressed concern about the effects of climate change on Diablo Canyon. One commenter expressed concern regarding fossil fuel emissions related to the nuclear fuel cycle.

Comments: (25-2) (25-8) (32-5) (40-1) (41-4) (44-14) (47-15) (52-7-4) (52-39-2) (52-40-4) (53-1-1) (53-3-2) (53-36-7) (53-39-2)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the greenhouse gas emissions and climate change resource area and/or supplemental applicable areas. As part of its environmental review, the NRC staff will consider the impacts of the proposed action on climate change and climate change impacts on environmental resources that are affected by the proposed action. However, the impacts of climate change on the operations and safety of the facility are outside the scope of the NRC's license renewal review.

### **B.1.13 Comments Concerning Historic and Cultural Resources**

**Comment Summary:** Attorney Tori Gibbons of the law firm Shute, Mihaly & Weinberger provided comments on the proposed action on behalf of the yak tiṭu tiṭu yak tiłhini (YTT) Northern Chumash Tribe. These comments reiterated concerns explained in an in-person meeting with the NRC staff in February 2024. The YTT requested that the draft SEIS include updated anthropological research identifying the YTT as lineal descendants for the project site and that an agreement document be signed with the YTT regarding the further study and treatment of cultural resources within the Diablo Canyon lands. The comments included an ethnographic study done in 2020 by John R. Johnson of the Santa Barbara Museum of Natural History that demonstrated the YTT's cultural lineage to the area.

Comments: (51-1) (51-2) (51-3)

**Response** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the historic and cultural resources area and/or supplemental applicable areas.

**Comment Summary:** The Santa Ynez Band of Chumash Indians provided comments on what the NRC staff should consider under the various federal laws and regulations pertaining to cultural resources and Tribal consultation. The Tribe requested an underwater archaeological survey for all areas that may have a ground disturbing component and requested to have a Tribal monitor present for all general ground-disturbing activities. The Tribe also stated that the NRC staff should consider all non-exhaustive methods of remediation prior to performing any excavation that could potentially impact cultural resources and should consider cumulative impacts at other project areas where remediation actions may take place. Lastly, the Tribe requested that all further communication be directed to Sam Cohen, Government Affairs and Legal Officer.

Comments: (50-1) (50-2) (50-3) (50-4) (50-5) (50-6)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the historic and cultural resources area and/or supplemental applicable areas.

**Comment Summary:** The EPA recommended that the NRC staff do the following in the draft SEIS:

- Identify and integrate Indigenous Knowledge into the draft SEIS analysis, as appropriate.
- Where available, include the collection of local and traditional knowledge concerning the affected environment, anticipated impacts from the project, and traditional hunting and land use patterns in the area.
- Possibly utilize CEQ's Guidance for Federal Departments and Agencies on Indigenous Knowledge as a resource to address Indigenous Knowledge in the draft SEIS.

A commenter from the YTT Tribe stated that Diablo Canyon is sitting on one of their ancestral village sites. Another commenter stated that Diablo Canyon is located on land that was the ancestral home of the YTT Tribe.

Comments: (25-6) (47-22) (52-11-1)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the historic and cultural resources area and/or supplemental applicable areas.

#### **B.1.14 Comments Concerning Human Health – Nonradiological**

**Comment Summary:** One commenter stated that the temperature of the water around Diablo Canyon causes lung problems.

Comments: (52-40-5)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the

development of the draft SEIS within the human health-nonradiological resource area and/or supplemental applicable areas.

#### **B.1.15 Comments Concerning Human Health – Radiological**

**Comment Summary:** One commenter expressed concerns about the human health effects of radioactivity from Diablo Canyon. Another commenter stated that radiation doses from Diablo Canyon are less than one cross-country flight.

Comments: (52-40-3) (53-24-1)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the human health-radiological resource area and/or supplemental applicable areas.

#### **B.1.16 Comments Concerning Hydrology – Surface Water Resources**

**Comment Summary:** A commenter stated that the draft SEIS should include discussions on potential resource impacts and information on the Clean Water Act and associated requirements. Several commenters expressed concern about elevated temperature of water and salinity of water released into the ocean from the Diablo Canyon cooling system. Several commenters expressed concern that the State Water Resources Control Board has allowed waivers to the Clean Water Act for Diablo Canyon. One commenter expressed concern regarding contamination from radionuclides and heavy metals in the discharged cooling water. One commenter expressed concern regarding sedimentation rates in the intake cove and the possibility of dredging operations.

Comments: (6-2) (6-4) (14-5) (14-7) (20-4) (25-4) (27-2) (37-5) (39-4) (44-2) (44-7) (47-5) (53-36-6)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the surface water resources area and/or supplemental applicable areas.

#### **B.1.17 Comments Concerning Land Use and Visual Resources**

**Comment Summary:** One commenter expressed concern that closing Diablo Canyon would require additional land to be used for energy production.

Comments: (25-3)

**Response:** To the extent that this comment falls within the scope of license renewal, this comment will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the land use and visual resources areas and/or supplemental applicable areas.

### **B.1.18 Comments Concerning Air Quality**

**Comment Summary:** A commenter recommended that the draft SEIS address the characterization of existing air quality conditions in order to evaluate project impacts, evaluate whether proposed project activities could affect air quality, analyze mitigation measures, and address the timeframe for release of criteria pollutants during the license lifespan.

Another commenter stated that nuclear energy has the lowest lifecycle emissions among all energy sources.

Comments: (32-7) (47-14)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the air quality resource area and/or supplemental applicable areas.

### **B.1.19 Comments Concerning Process – NEPA**

**Comment Summary:** Commenters requested that the environmental review for the proposed action of Diablo Canyon license renewal include a risk and benefit analysis; ensure clear articulation of the purpose and need, analyses, and potential impacts; and be completed in an efficient and timely manner.

Comments: (15-8) (25-1) (32-3) (36-4) (37-8) (47-2) (48-1)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS.

### **B.1.20 Comments Concerning Process – Licensing Action**

**Comment Summary:** Commenters expressed appreciation and concern for the license renewal process for Diablo Canyon and associated public comment opportunities. These included perceived deviations from the license renewal process, technical difficulties with submitting scoping comments or participating in virtual meetings, and the general openness and extent of the NRC's process. One commenter expressed appreciation for the NRC's flexibility in postponing the adjournment of a public meeting so they could make comments. One commenter expressed concern regarding the Coastal Zone Management Act and required documentation.

Comments: (14-1) (15-9) (16-1) (16-2) (32-1) (32-9) (39-8) (39-11) (39-12) (40-3) (40-8) (41-11) (44-1) (46-2) (47-1) (47-4) (47-21) (52-2-1) (52-5-1) (52-11-4) (52-28-1) (52-32-1) (52-33-1) (52-39-1) (52-41-4) (53-6-1) (53-19-7) (53-26-1) (53-27-1) (53-30-6) (53-39-12) (53-39-14)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS. The NRC staff appreciates feedback related to the public comment opportunities for this action and continually seeks to improve opportunities for public involvement.

### **B.1.21 Comments Concerning Socioeconomics**

**Comment Summary:** Commenters called attention to the ongoing beneficial economic impacts associated with the continued operation of Diablo Canyon. These comments suggest that the continued operation of Diablo Canyon under renewed operating licenses would result in beneficial economic impacts in the affected area from continued property tax revenues that provide financial support for schools, worker incomes, and philanthropic support to local organizations. One commenter expressed concern that Diablo Canyon may have fewer jobs than people estimate. One commenter stated that the draft SEIS should note that PG&E's 2021 transportation study of level of service for local roadways was based on the decommissioning of the plant, not license renewal and continued operations.

Comments: (5-3) (7-7) (11-6) (12-2) (15-3) (15-6) (18-2) (36-2) (40-5) (44-15) (46-4) (46-6) (52-1-1) (52-7-3) (52-18-2) (52-23-2) (52-24-2) (52-29-4) (53-3-5) (53-4-2) (53-10-1) (53-27-8) (53-36-11)

**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the socioeconomics area and/or supplemental applicable areas.

### **B.1.22 Comments Concerning the Uranium Fuel Cycle**

**Comment Summary:** One commenter expressed concern about uranium mining on indigenous lands.

Comments: (52-41-3)

**Response:** To the extent that this comment falls within the scope of license renewal, this comment will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the uranium fuel cycle resource area and/or supplemental applicable areas.

### **B.1.23 Comments Concerning Waste Management – Radioactive Waste**

**Comment Summary:** The EPA recommended that the draft SEIS address impacts of waste generation, identify waste types and volumes as well as waste management plans for the proposed license renewal term, address federal hazardous waste requirements, discuss waste minimization, discuss worker and public health hazards from waste management,, disclose emergency response procedures, and describe measures to protect the public and workers from radiological exposure during offsite transportation.

Other commenters expressed concerns regarding radioactive waste storage and disposal. One commenter suggested launching waste into space.

Comments: (8-3) (13-4) (19-3) (20-5) (27-6) (28-1) (39-6) (41-10) (43-2) (47-10) (47-12) (49-2) (49-4) (52-41-2) (52-41-6) (53-9-3) (53-13-2) (53-19-2) (53-32-4) (53-32-6) (53-36-2) (53-36-5) (53-39-11) (53-39-13)



**Response:** To the extent that these comments fall within the scope of license renewal, these comments will be considered as part of the NRC staff's review and analysis during the development of the draft SEIS within the waste management resource area and/or supplemental applicable areas.

## **B.2 Non-Technical and Comments Outside the Scope of the Environmental Review**

### **B.2.1 General Comments in Opposition to the Licensing Action**

**Comment Summary:** Commenters expressed opposition to nuclear power, PG&E, or the proposed action of Diablo Canyon license renewal. The commenters cited various safety and environmental concerns and a preference for other energy sources.

A comment submission from the San Luis Obispo Mothers for Peace included an attachment titled, "The Prudent Course on Continued Operation of Diablo Canyon Nuclear Power Plant: Take the Offramp Now," by Peter Bradford. The attachment provides a critique of the California Public Utilities Commission regarding the extension of operations at Diablo Canyon pursuant to California Senate Bill 846. See ML24038A403 to view the full text of the submission.

Comments: (1-1) (4-2) (9-3) (9-9) (13-1) (17-1) (19-1) (20-1) (20-9) (21-2) (22-1) (22-4) (26-5) (27-1) (27-8) (28-3) (28-5) (33-1) (33-5) (34-1) (41-6) (43-6) (44-16) (52-13-5) (52-15-1) (52-40-1) (52-40-7) (52-41-1) (53-13-1) (53-18-2) (53-19-10) (53-20-3) (53-30-8) (53-32-8) (53-38-1) (53-39-1) (53-39-7) (53-39-9) (53-39-17) (53-40-3)

**Response:** These comments are outside the scope of the NRC staff's environmental review and will not be discussed in the draft SEIS.

### **B.2.2 General Comments in Support of the Licensing Action**

**Comment Summary:** Commenters expressed support for nuclear power, PG&E, or the proposed action of Diablo Canyon license renewal. The commenters cited the clean energy provided by nuclear power, the safe operation of Diablo Canyon, and the positive impact on the community by PG&E and its employees.

Comments: (2-1) (5-1) (7-1) (7-6) (7-8) (11-1) (11-2) (11-10) (12-1) (12-3) (12-6) (15-1) (15-2) (15-7) (15-10) (18-1) (18-4) (25-7) (32-2) (36-3) (38-1) (46-1) (46-3) (46-8) (52-3-1) (52-4-1) (52-6-2) (52-7-1) (52-7-6) (52-8-1) (52-9-3) (52-10-1) (52-14-1) (52-16-1) (52-17-1) (52-18-1) (52-18-3) (52-19-1) (52-20-1) (52-21-1) (52-22-1) (52-24-1) (52-24-6) (52-25-1) (52-27-1) (52-27-2) (52-27-3) (52-28-3) (52-29-1) (52-29-5) (52-30-1) (52-31-2) (52-34-1) (52-35-1) (52-36-1) (52-37-1) (52-38-4) (52-39-3) (52-42-1) (52-44-1) (53-2-1) (53-3-1) (53-3-7) (53-4-4) (53-6-2) (53-7-3) (53-8-1) (53-9-1) (53-9-4) (53-10-2) (53-12-1) (53-14-4) (53-15-1) (53-15-3) (53-16-1) (53-17-6) (53-21-1) (53-22-1) (53-23-1) (53-27-2) (53-27-4) (53-27-9) (53-28-1) (53-29-1) (53-32-1) (53-33-2) (53-34-1) (53-35-3)

**Response:** These comments are outside the scope of the NRC staff's environmental review and will not be discussed in the draft SEIS.

### **B.2.3 Comments Concerning Issues Outside the Scope of the Environmental Review – Emergency Preparedness**

**Comment Summary:** Commenters expressed concern regarding emergency preparedness, such as transportation complications in an emergency evacuation, coordination of emergency procedures and security, or the adequacy of emergency plans.

Comments: (23-2) (41-2) (47-11) (49-6)

**Response:** Emergency planning and preparedness are safety matters that are part of the Diablo Canyon current licensing basis. The NRC’s environmental review is confined to environmental matters relevant to the proposed action of license renewal. These comments are outside the scope of the NRC staff’s environmental review and will not be discussed in the draft SEIS.

### **B.2.4 Comments Concerning Issues Outside the Scope of the Environmental Review – Miscellaneous**

**Comment Summary:** Commenters expressed concerns over the management of previous events associated with Diablo Canyon or PG&E.

Comments: (6-6) (11-7) (11-8) (16-6) (17-3) (20-7) (27-7) (39-2) (39-9) (45-1)

**Response:** These comments are outside the scope of the NRC staff’s environmental review and will not be discussed in the draft SEIS. However, comments germane to the NRC’s work will be passed along to the appropriate NRC staff.

### **B.2.5 Comments Concerning Issues Outside the Scope of the Environmental Review – Aging Management**

**Comment Summary:** Several commenters expressed concern about aging components at Diablo Canyon or the ability to effectively manage aging during the license renewal period. Multiple commenters specifically cited Diablo Canyon Unit 1 components as a concern.

A comment submission from the San Luis Obispo Mothers for Peace included an attachment titled, “Embrittlement of Reactor Pressure Vessel at Diablo Canyon Unit 1 Poses an Unacceptable Safety Risk During Current and Extended Operation,” by Dr. Digby Macdonald. The attachment conveys concerns that Diablo Canyon Unit 1 poses an unreasonable risk to public health and safety due to serious indications of an unacceptable degree of embrittlement, coupled with a lack of information to establish otherwise. See ML24038A403 to view the full text of the submission.

Comments: (1-3) (1-4) (6-1) (9-8) (10-1) (17-4) (20-3) (21-3) (23-1) (27-3) (29-1) (33-3) (34-3) (34-5) (35-1) (35-2) (37-4) (52-12-1) (52-13-2) (52-26-2) (53-14-1) (53-20-1) (53-31-1) (53-36-10) (53-39-8)

**Response:** These comments are outside the scope of the NRC staff’s environmental review and will not be discussed in the draft SEIS. Aging management issues will be addressed in the NRC staff’s safety review of the license renewal application. Other safety issues are addressed under the current licensing basis for Diablo Canyon.

## **B.2.6 Comments Concerning Issues Outside the Scope of the Environmental Review – Safety**

**Comment Summary:** Commenters expressed general concerns over the safety of nuclear power and the safety risks associated with natural events such as seismicity, and safety risks associated with aging plant components, including embrittlement. Other commenters expressed that they did not have any safety concerns associated with Diablo Canyon.

A comment submission from the San Luis Obispo Mothers for Peace included an attachment titled, “PG&E Significantly Underestimates Seismic Risk to [Diablo Canyon],” by Dr. Peter Bird. The attachment conveys concerns that the risk of an earthquake-caused accident at Diablo Canyon has been significantly underestimated. See ML24038A403 to view the full text of the attachment.

Comments: (1-2) (1-5) (3-1) (4-1) (6-5) (7-4) (8-1) (8-2) (8-5) (9-7) (13-3) (13-5) (13-7) (14-3) (14-4) (17-2) (19-2) (20-6) (20-8) (21-4) (22-3) (26-2) (27-5) (28-2) (28-4) (30-1) (31-1) (33-2) (33-4) (37-1) (37-7) (39-1) (39-3) (39-7) (39-10) (40-9) (41-1) (41-3) (41-5) (41-7) (41-8) (41-9) (42-1) (42-3) (42-4) (43-1) (43-3) (43-4) (44-8) (44-9) (44-10) (44-11) (44-12) (46-5) (47-17) (47-19) (49-1) (49-3) (49-5) (49-7) (52-5-2) (52-9-1) (52-10-3) (52-11-5) (52-13-4) (52-15-3) (52-23-1) (52-23-3) (52-24-4) (52-28-2) (52-29-3) (52-31-1) (52-33-3) (52-40-2) (52-40-6) (52-45-1) (53-3-6) (53-14-5) (53-19-4) (53-20-2) (53-24-2) (53-25-1) (53-26-2) (53-27-6) (53-32-5) (53-36-8) (53-36-9) (53-36-14) (53-39-4) (53-39-6) (53-39-15)

**Response:** These comments are outside the scope of the NRC staff’s environmental review and will not be discussed in the draft SEIS. Aging management issues will be addressed in the NRC staff’s safety review of the license renewal application. Other safety issues are addressed under the current licensing basis for Diablo Canyon.

## **B.2.7 Comments Concerning Issues Outside the Scope of the Environmental Review – Security**

**Comment Summary:** One commenter stated that Diablo Canyon has a high level of security.

Comments: (53-7-1)

**Response:** Diablo Canyon is subject to existing NRC requirements related to physical security as part of its current licensing basis. The NRC’s regulations in 10 CFR Part 73, “Physical Protection of Plants and Materials,” provide requirements related to physical security. These requirements apply to all operating licenses including renewed operating licenses. The NRC staff will not consider this comment further in the draft SEIS because it is outside the scope of the staff’s environmental review.

## **B.2.8 Comments Concerning Issues Outside the Scope of the Environmental Review – Energy Costs**

**Comment Summary:** Commenters expressed concern over the cost effectiveness and impacts on tax and ratepayers of nuclear power compared to alternative means of power generation and of repairing, replacing, or maintaining aging infrastructure in the license renewal period for Diablo Canyon. A commenter also expressed concern over the cost effectiveness of not

renewing the Diablo Canyon licenses. Several commenters stated that nuclear energy was more affordable than other options.

A comment submission from the San Luis Obispo Mothers for Peace included an attachment titled, "Extended Operation of the Diablo Canyon Nuclear Plant: What will it cost and who will pay for it?," by Mark Cooper. The attachment communicates the author's perception that continued operations of Diablo Canyon places a large economic burden on energy consumers and impedes the growth of renewable energy alternatives. See ML24038A403 to view the full text of the submission.

Comments: (4-4) (6-8) (8-4) (9-2) (9-5) (10-2) (12-5) (14-9) (17-5) (19-5) (22-2) (26-4) (37-3) (52-7-5) (52-13-3) (52-43-1) (53-3-4) (53-4-3) (53-17-4) (53-18-1) (53-19-3) (53-19-5) (53-27-7) (53-32-2)

**Response:** These comments are outside the scope of the NRC staff's environmental review and will not be discussed in the draft SEIS. However, comments germane to the NRC's work will be passed along to the appropriate NRC staff.

## **B.2.9 Comments Concerning Issues Outside the Scope of the Environmental Review – Need for Power**

**Comment Summary:** Commenters questioned the need for nuclear power and whether there is sufficient electricity demand justifying the proposed action of Diablo Canyon license renewal, especially when considering other energy projects proposed in the region.

A comment submission from the San Luis Obispo Mothers for Peace included an attachment titled, "California has enough power to keep the lights on without [Diablo Canyon]," by Rao Konidena and Rakon Energy LLC. The attachment argues that California has enough power from other sources without the continued operation of Diablo Canyon and provides a critique of grid reliability planning data presented by the California Energy Commission. See ML24038A403 to view the full text of the submission.

Comments: (4-3) (5-2) (5-4) (6-7) (6-9) (7-2) (7-5) (9-1) (9-4) (9-6) (11-3) (11-5) (11-9) (12-4) (14-8) (15-4) (15-5) (16-3) (16-4) (17-6) (18-3) (19-4) (21-1) (26-1) (26-3) (32-4) (36-1) (37-2) (39-13) (40-2) (40-7) (42-2) (43-5) (52-5-4) (52-7-2) (52-10-2) (52-15-2) (52-24-3) (52-29-2) (52-33-2) (52-38-2) (53-7-2) (53-16-4) (53-17-1) (53-17-5) (53-19-8) (53-27-3) (53-33-1) (53-35-2) (53-37-2) (53-37-4)

**Response:** These comments are outside the scope of the NRC staff's environmental review and will not be discussed in the draft SEIS. However, comments germane to the NRC's work will be passed along to the appropriate NRC staff.

## **B.2.10 Comments Concerning Issues Outside the Scope of the Environmental Review – Other Non-License Renewal Actions**

**Comment Summary:** Several comments address license renewal of, continued operations of, and construction of other nuclear power plants. Several comments pertain to events at nuclear power plants outside the United States. Some commenters expressed concern regarding State of California actions related to Diablo Canyon. Some commenters expressed concerns

regarding the responsibilities of the NRC outside of the proposed action of Diablo Canyon license renewal. One commenter expressed concern regarding other government agencies.

Comments: (34-4) (52-23-5) (52-23-6) (52-23-7) (52-23-8) (52-26-1) (52-33-4) (53-9-2) (53-19-6) (53-30-3) (53-32-3) (53-35-1) (53-37-1) (53-39-5) (53-40-2)

**Response:** These comments are outside the scope of the NRC staff's environmental review and will not be discussed in the draft SEIS. However, comments germane to the NRC's work will be passed along to the appropriate NRC staff.

#### **B.2.11 Comments Concerning Issues Outside the Scope of the Environmental Review – Offsite Fuel Storage**

**Comment Summary:** A commenter stated that the draft SEIS should analyze the risks of long-term offsite spent nuclear fuel storage.

Comments: (53-30-4)

**Response:** This comment is outside the scope of the NRC staff's environmental review and will not be discussed in the draft SEIS.