

From: Wyatt-Mair, Arwen@Waterboards
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Sent: Monday, December 16, 2024 6:52 PM
To: DiabloCanyonEnvironmental.Resource
Subject: [External_Sender] NUREG-1437, Supplement 62, Draft - Central Coast Regional Water Quality Control Board Comments - Diablo Canyon Nuclear Power Plant
Attachments: CCRWQCB Comments on NUREG-1437, Supplement 62, Draft for DCPD.pdf

See attached for comments from the Central Coast Regional Water Quality Control Board on the draft *Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Plants, Supplement 62, Regarding Renewal of Diablo Canyon Nuclear Power Plants, Units 1 and 2.*

Thank you,

Arwen Wyatt-Mair (she/her), P.E.
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Central Coast Regional Water Quality Control Board

December 16, 2024

U.S. Nuclear Regulatory Commission (NRC)
Office of Nuclear Material Safety and Safeguards
Mailstop T-4 B72
Washington, DC 20555-0001
Comments via email: DiabloCanyonEnvironmental@nrc.gov

Dear Kim Conway:

NUREG-1437, SUPPLEMENT 62, DRAFT - CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD COMMENTS - DIABLO CANYON NUCLEAR POWER PLANT

Thank you for the opportunity to comment on the draft *Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Plants, Supplement 62, Regarding Renewal of Diablo Canyon Nuclear Power Plants, Units 1 and 2*. The Central Coast Regional Water Quality Control Board (CCRWQCB) has reviewed the GEIS and has several comments on the draft document.

1. Page 3-36, line 4 reads: "NPDES Permit No. CA0003571"

CCRWCB comment: Please update to NPDES Permit No. CA0003751.

2. Page 3-36, lines 7-10 read: "According to PG&E, the NPDES permit is anticipated to be re-issued in late 2026 (PG&E 2023-TN9822). PG&E confirmed that during its discussions with the CCRWQCB, the Board did not indicate any changes to Diablo Canyon's NPDES permit would be required (PG&E 2024-TN10032)."

CCRWCB comment: The CCRWQCB is in the process of updating the NPDES permit and has not yet determined the full extent of changes the new permit will include relative to the 1990 permit. However, the CCRWQCB anticipates at least the following changes: an updated reasonable potential analysis that may result in additional and/or modified effluent limitations; various updates to be consistent with California's current Ocean Plan, including updated toxicity requirements; various updates to be consistent with the CCRWQCB's current Basin Plan; an updated monitoring and reporting program; and updated regulatory references.

3. Page 3-36, lines 20-22 read: “There have not been any violations associated with Diablo Canyon wastewater discharges over the 5-year reporting period from 2018-2022 (PG&E 223-21TN9822).

CCRWQCB comment: PG&E has not self-reported any effluent limit violations over the 5-year reporting period from 2018-2022. The CCRWQCB will conduct a detailed compliance evaluation during the NPDES permit renewal process.

4. Page 3-36, lines 41-43 read: “When metal cleaning operations occur, discharges 001D, 001F, 001L, and 001M have specified concentration limits for total copper and total iron.”

CCRWQCB comment: Consistent with the NPDES permit, please update to: “When metal cleaning operations occur, discharges 001D, 001F, 001I, 001L, and 001M have specified concentration limits for total copper and total iron.”

5. Page 3-38, lines 19-40 discuss stormwater permitting requirements. Lines 35-39 read “Constituents include total suspended solids, oil and grease, metals, tritium, gamma emitters, total organic carbon, biochemical oxygen demand, temperature, turbidity, polycyclic aromatic hydrocarbons, and chronic toxicity. The SWPPP outlines sampling locations, frequencies, and reporting requirements (PG&E 2023-TN9822).”

CCRWQCB comment: Please update the language to read: “Constituents include, but are not limited to, total suspended solids, oil and grease, metals, tritium, gamma emitters, total organic carbon, biochemical oxygen demand, temperature, turbidity, polycyclic aromatic hydrocarbons, and chronic toxicity. The SWPPP outlines sampling locations, frequencies, and monitoring and reporting requirements.”

Thank you for your consideration of these comments. If you have any questions or would like more information, please contact Arwen Wyatt-Mair at arwen.wyattmair@waterboards.ca.gov

Sincerely,

for Ryan E. Lodge
Executive Officer

ECM: 248185