

Comment Set 1
Michael M. Marinak

California Public Utilities Commission
c/o Nicolas Procos
Aspen Environmental Group
235 Montgomery St. - Suite 395
San Francisco, Ca 94104

December 27, 2004

Dear Commissioners,

The Diablo Canyon nuclear power plant is an extremely valuable resource to California. Its exceptionally low power production costs continue to save ratepayers nearly one billion dollars annually. It produces no significant air pollution and greenhouse gases, helping California to meet its clean air goals. It is a very reliable source of high quality electricity and does not rely upon imported fossil fuels. Its huge 2250 MW capacity plays an important role in helping California avoid continuing rotating blackouts.

1-1

PG&E's plan to replace the steam generators is essential for consumers to continue benefiting from this resource. Steam generator replacement has been successfully accomplished at dozens of nuclear power plants around the country. In many cases it was accomplished in only slightly longer time than required for a typical refueling outage.

The Diablo Canyon plant produces reliable emission-free electricity to over 2 million California residents. Its power production costs are among the lowest of any source in the state, averaging just 1.57 cents per kilowatt hour (1999-2001 average; www.nei.org/index.asp?catnum=2&catid=282). In 2002 alone Diablo Canyon avoided the generation of 14 thousand tons of nitrogen oxide and 10 thousand tons sulfur dioxide air pollutants. DCPD also avoided emissions of 11 million tons of carbon dioxide greenhouse gases. The reduction in air pollution is equivalent to removing two million cars from the roads. And its fuel is not imported. Low costs, cleaner air and a reduced trade deficit are among the reasons the President's energy policy relies upon increased use of nuclear energy to meet our expanding electricity needs. Furthermore several public opinion polls, including a recent Field poll, confirm that the vast majority of Californians support nuclear energy.

1-2

The costs of replacing the steam generators amortized over several years will amount to only a few tenth of one cent per kilowatt hour. This aggregate production cost is far, far lower than any alternative available in California.

1-3

Comment Set 1, cont.
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Therefore the commission should support the steam generator replacement project and rule soon that reasonable costs incurred in this endeavor are prudent.

1-4

California faces a real possibility of rotating blackouts in coming years. Commissioner there is no technology available that could replace Diablo Canyon's huge 2250 MW capacity reliably and at reasonable cost, without producing large amounts of greenhouse gases and air pollution. Generating power from natural gas instead would cost far more, at least 6 cents per kilowatt hour, and perhaps much higher as natural gas prices continue to increase. Sizeable costs would also be incurred for the construction for new gas plants, assuming they could be sited, and not violate the clean air act. Rotating blackouts would result if sufficient new generating capacity could not be constructed.

1-5

Windmills cannot replace the plant's generating capacity. Windmills produce low quality, unreliable power. Power dispatchers must always work to maintain the delicate balance between power generation and consumption. Dispatchers can compensate for fluctuations in wind power only when wind farms supply no more than about 10 percent of the power in a large grid. The multi-state blackout of the northeast in 2003 reminds us of the necessity of maintaining grid stability. There are times when the wind is calm everywhere. At these times the power must come from somewhere else. While wind turbines do reduce use of fuel, they do not allow a utility to retire so much as one power plant. The utilities must maintain full reserve to handle the situation when the wind does not blow. In other words, wind turbines do not add meaningful capacity to a system. Wind power electricity costs are far higher than electricity production costs for Diablo Canyon.

1-6

There is also the problem of enormous land usage and visual blight associated with wind farms. At prime locations wind farms generate an average of 1.2 W/m². Producing average power equal to the combined output of the Diablo Canyon and San Onofre plants, if such sites could be found, would require covering a swath of land about 5 miles wide stretching from San Francisco to Los Angeles. The already large problems with many thousands of bird deaths annually at California wind farms would soar. Such a project might change the state's weather patterns. Its stochastic wind power would generate anywhere between zero to 70% of the state's demand, with wild, unpredictable, uncontrollable fluctuations in between. Again the grid operators could not adjust for such large wild fluctuations. We would

Comment Set 1, cont.
Michael M. Marinak

be stuck with more expensive, stochastic wind power and an environmental impact on a scale biblical proportions.

1-6

Solar photovoltaics have similar problems with reliability and enormous land usage. With an electricity cost of 25 cents per kilowatt hour photovoltaics remain one of the most expensive methods for producing electricity, which is precisely why so little of it is in use.

1-7

Denying PG&E's ability to replace the steam generators would burden ratepayers with BILLIONS of dollars in needless increased costs.

1-8

Finally I must comment on the ignoble brief filed by the group Mother's for Peace. Their legal brief is filled with falsehoods. For example it claims "In fact no governmental agency, including this commission or the NRC, has taken a hard look at this facility ... to ensure the DCNPP does not pose a substantial risk of danger to the people and the environment of this state." The truth is the Diablo Canyon is among the most studied power plants in history. During the rigorous NRC licensing process, lasting 17 years, every component of the plant's design and construction was analyzed and tested. Some of the nation's brightest scientific minds are responsible for the sophisticated engineering embodied in this plant, a level of sophistication that Grueneich is apparently incapable of even appreciating. One wonders how a reasonable, rational person could read through the reams of technical documents generated during the NRC's licensing process and conclude the plant's safety has never been reviewed.

1-9

Diablo Canyon is engineered to the most demanding specifications and designed to withstand extremely strong earthquakes. In fact its design enables it to withstand earthquakes a full two levels higher on the Mercalli scale than the largest fault in the area could produce. The NRC asserts the plant is safe from all earthquake effects. Indeed the plant handled the December 2003 magnitude 6.5 earthquake in the area exceptionally well. It was not even necessary to reduce the plant's power output. Yet the MFP brief claims, "The costs to our county and to ratepayers from inadequate seismic and safety measures at Diablo Canyon are immeasurable." Really? Diablo Canyon is designed to withstand shaking 20 times as strong as the December 2003 earthquake. While the earthquake caused millions of dollars in damages elsewhere in San Luis Obispo County, Diablo Canyon sustained no damage and continued to produce its low cost, reliable power. It's electricity assisted in the county's recovery efforts, helping the county get

1-10

Comment Set 1, cont.
Michael M. Marinak

“back on it’s feet.” Diablo Canyon is consistently ranked among the safest and most productive nuclear plants by the NRC and the Institute of Nuclear Power Operations.

1-10

These are but two examples of the numerous egregious falsehoods contained within the MFP brief. These underhanded smear tactics and legal harassments of California’s energy producers are not the work of a balanced objective mind. Rather these are the words of strident radical ideologues who will not let mere facts stand in the way of their pronouncements. Commissioners you have a responsibility to protect the electricity customers and producers of this state from these vampires. I believe PG&E should be allowed to sue Mother’s for Peace for defamation.

1-11

We must preserve the Diablo Canyon power plant because it reduces electricity rates, and helps California achieve its required reductions in air pollution. Diablo Canyon adds important diversity to the state’s electricity resources, reducing both our dependence on imported fuels and our foreign trade deficit. It’s high quality, reliable power is needed to avoid future rotating blackouts.

1-12

Sincerely,



Michael M. Marinak, Ph.D.
49 Arbolado Drive
Walnut Creek, CA
94598

Responses to Comment Set 1 Michael M. Marinak

- 1-1 The first portion of the comment describes the benefits of DCPD and does not require a response. The second portion of the comment notes that the steam generators would allow consumers to continue reaping benefits from DCPD, and that successful steam generator replacement has occurred at other sites. As of March 2004, 34 operating units had successfully replaced the original steam generators. In the United States, there are 57 operating units (including Diablo Canyon Power Plant) that contained a total of 167 steam generators made with Alloy 600MA tubing, the tubing material in the DCPD's original steam generators. In addition to those units that have already completed steam generator replacement projects, another 21 units are working on replacement projects. It is estimated that by 2009, only two units, with a total of five steam generators, will still be operating with original tubing material. Please refer to Sections A.2.2 and B.3 of the Final EIR for more information on steam generator replacement projects.
- 1-2 This comment describes the benefits of DCPD and does not require a response.
- 1-3 The comment addresses the economics of the Proposed Project. Issues related to project cost are not addressed under CEQA, as noted in Draft EIR Section A and Section D.1.2.5. The ratemaking proposal is a focus of the CPUC General Proceeding. In the General Proceeding, the CPUC must balance the environmental impacts of the Proposed Project with the economic consequences of cost recovery that would be sponsored by the ratepayers. Section A.5 of the Draft EIR describes how the CPUC uses non-environmental information in the decision-making process.
- 1-4 The commenter requests that the CPUC support the Proposed Project and its costs.
- 1-5 The commenter states that there are no technologies that could reliably and cost-effectively replace DCPD's 2,200 MW capacity without producing large amounts of air pollution. Section C.6 of the Draft EIR describes the various alternatives that include natural gas combined cycle power plants; transmission facilities; alternative energy technologies such as solar thermal, photovoltaics, wind turbines, geothermal power, biomass power, fuel cells; and system enhancements including demand-side management and distributed generation. Section D.1.2.3 notes that it would be speculative to forecast exactly how any replacement power would be provided.
- 1-6 The comment notes that wind power alone can not replace the 2,200 MW of base-load electricity generated by DCPD. In Section C.6.3.3 of the Draft EIR, it is similarly noted that the intermittent nature of wind power makes this technology unsuitable for base-load electricity generation. The Draft EIR also notes that there is a lack of transmission facilities connecting wind resource areas to the grid. Throughout the Draft EIR, the environmental impacts of development and operation of wind turbines, including the requirement of large land areas to generate sufficient electricity, visual impacts, and bird mortality, are described as part of the analysis for the No Project Alternative.
- 1-7 The comment notes the impacts of solar photovoltaics, which are described in the Draft EIR as part of the No Project Alternative in Section C.6.3.2. Similar to wind turbines, the Draft

- EIR describes that photovoltaics can have negative environmental impacts such as large land requirements and visual blight.
- 1-8 The comment asserts that ratepayers would experience increased costs if the Proposed Project is not approved. Issues related to cost and ratepayer benefit, or lack of benefit, are not addressed under CEQA, as noted in Draft EIR Section D.1.2.5. These issues are addressed by the General Proceeding for the Proposed Project.
- 1-9 This comment provides a critical opinion of other comments filed on the Draft EIR and requires no response.
- 1-10 The comment presents the commenter's opinion of DCP's seismic design and engineering specifications, as well as DCP's stability during the 2003 San Simeon earthquake. The seismic safety of DCP is within the jurisdiction of the NRC, as noted in Draft EIR Section D.1.2.5 and MR-3 (Jurisdiction).
- 1-11 This comment provides a critical opinion of other comments filed on the Draft EIR and requires no response.
- 1-12 The comment supports the Proposed Project and provides the commenter's opinion on why Diablo Canyon Power Plant should be preserved. No response is necessary.

Comment Set 2 Ann Calhoun

Diablo Canyon EIR Project

From: churadogs@aol.com
Sent: Tuesday, March 29, 2005 6:15 AM
To: diablo_canyon@aspenerg.com
Subject: Diablo canyon update hearings

Input re: Diablo Canyon steam generator replacement:

Please spend the \$700 million, plus more, to switch Diablo to alternative power sources. Perfect place for solar arrays, windmills and undersea tidal generators. (no neighbor's to complain about ruining the view)

2-1

Oil's running out, nuclear storage will simply continue to become a bigger and more expensive problem, so it's time to shift gears and Diablo's the perfect place to do it.

As for the \$333 million additional need to make the switch? In 30 years, \$333 million will be chump change.

2-2

Ann Calhoun
1698 16th St.
Los Osos, CA 93402

4/1/2005

Responses to Comment Set 2

Ann Calhoun

2-1 Economic aspects of the Proposed Project are outside the scope of CEQA, as noted in Responses CC6-3 and 1-3 above. Cost issues are addressed by the CPUC in the General Proceeding for the Proposed Project.

The comment suggests use of tidal generators as replacement generation under the No Project Alternative. The CPUC considered this option, but believes that tidal generation is untested and not a feasible technology, especially on the scale of the 2,200 MW DCPP. The City and County of San Francisco has a tidal energy pilot project. The initial project goal was to create one megawatt of tidal energy, but the project has been scaled back to 150 kW. The cost of building a 1,000 MW system was estimated to be \$600 million.¹

Additional information concerning other alternative energy technologies, such as solar and wind power, is provided in Responses PM 1-4 and 12-15 below. Please also see Response CC5-17 for a discussion of radioactive waste materials.

2-2 Please see Response 2-1.

¹ Llanos, Miguel. 2003. "San Francisco to test tides for energy." MSNBC website. Online at <http://msnbc.msn.com/id/3339905/>. Accessed on June 24, 2005.

Comment Set 3 Val R. McClure

Diablo Canyon EIR Project

From: Valairart@aol.com
Sent: Tuesday, March 29, 2005 1:22 PM
To: diablo canyon@aspenerg.com
Subject: Above ground storage

Dear Diablo Friends:

I see by the paper that you will soon have public meetings regarding Diablo's replacement of steam generators. I believe the article also opened up the possibilities for suggestions on other problems regarding Diablo. I would like to address the problem of above ground storage of spent fuel.

I attended a PUC meeting some time ago, and made this suggestion. I feel that the idea is falling on deaf ears. I hope you can give the idea thoughtful consideration.

As I have many contacts in the SLO County I have asked these people what would make them feel more at ease in the storage problem, and then told them my idea. I have had almost 100% positive response to the suggestion. Most of them agreed that if my idea were carried out, it would relieve much of the anxiety that now exist regarding the longer term storage that may be needed.

The idea is a simple one. In the hill, directly in back of the Diablo plant, dig a large cave at the base of the hill. Make it big enough to hold the current and possible future storage needs of Diablo. Why is this a good idea?

1. - With a few hundred feet of earth over the storage it would be much safer against attacks.
- 2.- Heavy, radiation proof doors over the entrance would help in case of a radiation leak.
- 3.- This type of storage would ease the concerns of citizens of SLO, and the 5 cities area and cities to the North, who would be in the area of wind driven fallout.
- 4.- Diablo is uniquely situated, with large hills close by for such a project.
- 5.- A large amount of earth could be moved quickly with today's earth moving equipment.

Please, give this idea some real thought, it may solve many problems and lead to a longer production life. Thank you for your attention in this matter,
Sincerely,

Val R. McClure
Val R. McClure
285 Sunrise Drive
Arroyo Grande, CA. 93420
(805) 474 4158
vrmairart@aol.com

3-1

4/1/2005

Responses to Comment Set 3

Val R. McClure

- 3-1 The commenter's support for the construction of a cave on the DCPD property in which to store spent fuel is noted. Spent fuel storage is an aspect of DCPD operation through the current license periods that occurs in the environmental baseline, as described in Draft EIR Section D.1.2.1, that would not be changed by the Proposed Project. Please also refer to Master Response MR-1 (Baseline). Section D.12 of the Draft EIR discusses potential impacts and safety issues associated with radioactive materials. Please see Master Responses MR-2 (License Renewal) and MR-3 (Jurisdiction) regarding State authority in these areas.

Comment Set 4
Perry Martin

Andrew Barnsdale, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

April 5, 2005

Subject: Environmental Impact Report for Diablo Canyon Power Plant
Steam Generator Replacement Project.

This project would extend the operable life of the power plant far beyond the expiration of its current license to operate. Facing opposition from a community that will be delighted when their license expires, PG&E's plan is to invest over \$700 million of ratepayer money in new generators - then they'll be able to claim a need to upgrade the rest of the plant and renew their license so they can recover the cost of our investment. This piecemeal process is intended to avoid the scrutiny that would be involved in an EIR that analyzed the impact on the environment that will result from their plan to extend the plant's life.

4-1

Investing in new generators that will have an operating life far exceeding the rest of the parts of the plant will result in future projects and activity. This result is foreseeable because it will be necessary to upgrade other aging components so their life expectancy matches that of the new generators. These projects are identifiable and there is credible and substantial evidence on which to base an environmental review. PG&E's claim that they have not adequately developed the information necessary to anticipate future projects and activities that will result from this project is not believable and should be investigated.

4-2

CEQA guidelines require that all these probable future projects and activities must be analyzed in an EIR, either as a project impact or a cumulative impact. PG&E should not be permitted to limit the scope of the EIR to only analyzing the process of removing, transporting, and storing the existing generators and transporting, staging, and installing the new replacement generators. What the community is concerned about, and wants analyzed in an EIR, are the consequences of the future projects that will be necessary to make the operating life of the entire plant compatible with the extended life of the new steam generators.

4-3

The community is not going to get the inclusive environmental review they want in this EIR because the CPUC has claimed lead agency status and their single authorized responsibility is to establish the cost recovery ratemaking for the project. They have no jurisdiction to regulate or condition this project with respect to safety issues; or with respect to nuclear materials handling and storage issues, including design. Their role in this project is very limited and does not satisfy the CEQA guidelines for identifying the agency that should have lead agency status. Their claim to this status is not legitimate and is an obvious attempt to suppress public knowledge and comment by limiting the scope of the project's EIR. This EIR process is being manipulated to benefit PG&E.

4-4

4-5

Perry Martin
P.O. Box 75
Avila Beach, CA 93424
Phone: 805-783-1121 or 831-425-1121



Responses to Comment Set 4

Perry Martin

- 4-1 Please refer to Master Responses MR-1 (Baseline) and MR-2 (License Renewal). The EIR analyzes the impacts of the Proposed Project, which is steam generator replacement, not plant operations. Only the NRC may grant a renewal of the operating licenses. As acknowledged in Draft EIR Section D.1.2.2, replacement of the steam generators could provide an incentive for license renewal, but license renewal and plant operations beyond the current license expiration dates are not reasonably foreseeable consequences of the Proposed Project. The impacts of plant operation beyond the current license expiration dates will be evaluated if and when PG&E submits a license renewal application to the NRC. Section G of the Draft EIR generally discusses the potential impacts of license renewal, in accordance with the level of discussion warranted under CEQA.
- 4-2 Please refer to Response 4-1 and Master Responses MR-1 (Baseline) and MR-2 (License Renewal). The need for refurbishment of other components that could occur as a result of license renewal would be assessed by the NRC during the design and safety review of the license renewal process. This review would also identify the environmental impacts of refurbishing projects, should they be anticipated.
- 4-3 Please refer to Master Responses MR-1 (Baseline) and MR-2 (License Renewal). A project objective, as shown in Section A.2.1 of the Draft EIR, is to ensure DCPD operation until the end of the licenses. PG&E has not identified and CPUC is not aware of any other future projects that may be necessary to achieve this objective.
- 4-4 The CPUC has a role of CEQA Lead Agency for the Proposed Project as it pertains to the rate application, since the CPUC has regulatory authority over investor-owned utilities in California. Other agency approvals are also necessary, as identified in Draft EIR Table A-2. Only the federal government has jurisdiction over the safety and nuclear waste issues raised by the commenter. Please also see Master Response MR-3 (Jurisdiction).
- 4-5 See Response 4-4 above. The role of the CPUC and all other State and local authorities is limited by the NRC's exclusive authority to regulate nuclear power plants and radiological materials. The Draft EIR attempts to provide all relevant information about the impacts of the Proposed Project in accordance with the requirements of CEQA.

Comment Set 5
Michele Rene Flom

Re: DCPP Steam Generator Replacement Project D.14 Visual Resources

Throughout the twelve pages of this section's written text, the temporary nature of the visual impact on the environment is emphasized repeatedly, granting a slim total of eleven sentences to the only permanent change that will result to the DCPP site—the OSG Storage Facility. This 10,000 square foot concrete storage facility is proposed to be built without windows or any other architectural amenities. In other words this is going to be one ugly building.

5-1

Concerning both the aesthetically challenged storage facility and how the overall visual impact on the environment will be affected by the replacement project, the analysis repeatedly begs the question. Here is one example from the text: "Despite the picturesque natural setting of the facility, the existing industrial character of the facility represents an already visually compromised condition, and therefore, the employees' level of viewer concern at the workplace is already considered to be low" (D.14-25). Here the report implies that because the plant has already compromised the site environment, further compromise is not an issue worth considering. The proceeding quote also points to a significant omission regarding point of view. There is never, in section D.14 of the document, a reference to the potential **future** viewer who might well happen upon this coastal setting after the eventual decommission of the DC Nuclear Plant. The visual resources analysis is written as if future tomorrows do not exist. Unfortunately, this omission of future impacts or consideration of future California residents, leaves huge holes in the integrity of the EIR. And I can't think of an area where this is more clear than in the relationship between steam generator replacement and the corresponding tons of nuclear waste that will continue to be manufactured and stored on this piece of beautiful and volatile coast. If we are so lucky as to escape an affecting earthquake, or a terrorist attack, a tsunami—all more real possibilities than ever, future generations will most likely not escape the ancient observation that containers eventually leak.

5-2

5-3

5-4

We have come here tonight, your constituents, perhaps against reasonable hope, that you will listen carefully to our concerns at this important juncture. I urge you to at least insist that PG&E draft a more honest and comprehensive EIR. And I hope, that in the final sum, you will spend your energy supporting PG&E's movement forward into a future both safer and more sustainable.

5-5

Michele Flom

Responses to Comment Set 5

Michele (Rene) Flom

- 5-1 The commenter expresses concern about the aesthetic qualities of the proposed OSG Storage Facility. The Draft EIR (Section D.14.3.4) illustrates that although the proposed OSG Storage Facility and other onsite features are quite substantial, they are not viewed as features of high visual concern because they would not affect any scenically sensitive viewer groups.
- 5-2 The commenter incorrectly portrays the analysis in the Draft EIR. Although the environment has already been compromised, further visual compromise is considered. The issue is whether the potential change resulting from the Proposed Project would cross the threshold of *significant* environmental impact, when compared against the existing condition. The fact that the existing scenic quality at DCPP is highly compromised does affect the likelihood of finding of non-significant adverse visual impact. The condition of the existing plant site represents the environmental baseline against which the impact must be measured.
- 5-3 The comment addresses the potential future visual effects on viewers under the circumstance of plant decommissioning. Upon decommissioning, DCPP would represent an unattractive, scenically compromised setting that would be incompatible with high-sensitivity activities such as coastal recreation. This would be the case with or without the addition of the Proposed Project facilities, and the addition of the project-related onsite facilities would not cause the site to cross a threshold of potential future visual impact that would not otherwise be crossed without the facilities. The existence of DCPP, and the fact that it must eventually be decommissioned, is an aspect of the environmental baseline, as described in Draft EIR Section D.1.2.1.
- 5-4 The ongoing production of spent fuel waste is an activity that occurs in the environmental baseline (Draft EIR Section D.1.2.1); an analysis of long-term storage or disposal of radioactive waste at DCPP or elsewhere is limited by the exclusive regulation of nuclear safety by the federal government (Draft EIR Section D.1.2.5). See also Draft EIR Section D.12, System and Transportation Safety, for a description of radioactive waste issues related to the ongoing operation of DCPP and MR-3 (Jurisdiction).
- 5-5 The comment urges the decision-makers to reject PG&E's proposal because of the ongoing effects of continued DCPP operation.

Comment Set 6
Marty Brown

April 19, 2005

California Public Utilities Commission:

On pages ES-2 & ES- 23 of the Draft Environmental Impact Report dated March, 2005, prepared for the Commission, it states: “ The No Project Alternative represents a continuation of current environmental conditions, with the foreseeable closure of Diablo Canyon Power Plant, forced by the deterioration of the steam generators. The surroundings would experience beneficial environmental effects by shutting down the routine operation of DCP, most notably in the areas of marine biological resources and public safety.”

6-1

Any replacement power source that would be implemented would be safer for the public, the environment and future generations. As far as expense – if you take into account all the costs, both financial and environmental, of nuclear generation, from replacement of expensive generators and other parts and machinery, security, storage, transport and so on – it is by far the most costly method of producing electricity . This doesn't take into account the cost of any accidents, natural disasters or terrorist attacks. The cost would be astronomical in every way.

6-2

Who pays these costs? We do – the rate payers. We also bear the weight of untold tons of highly radioactive waste with no end in sight. I don't want it in my neighborhood, but I don't want it to be shipped to someone's else's either.

We don't want you to allow PG & E to replace the steam generators. We want a clean technology to be the replacement generation. Every effort should be made to identify a method that does not create air pollution or hazardous waste.

6-3

Respectfully submitted,



Marty Brown
8455 Graves Creek Road
Atascadero, Ca. 93422

Responses to Comment Set 6

Marty Brown

- 6-1 Sections C.6.1 and C.6.2 of the Draft EIR discuss replacement generation (e.g., natural gas-fired power plants) and transmission facilities, respectively, and throughout the Draft EIR the environmental effects of these options are illustrated in the discussion of the No Project Alternative. A comparison of the No Project Alternative with the Proposed Project is provided in Section E.3. Response 12-9 discusses the No Project Alternative and Responses 12-15 and PM1-4 deal with alternative energy technologies.
- 6-2 For a discussion of project cost, please refer to Responses CC6-3 and 1-3.
- Production of radioactive spent fuel occurs in the environmental baseline, as described in Section D.12.1 of the Draft EIR, and the Proposed Project would not alter how DCPP handles spent fuel. Please also refer to Responses CC5-17 and 9-1 for further discussion of radioactive materials.
- 6-3 The commenter's support for the No Project Alternative with alternative replacement energy sources is noted.

Comment Set 7
Steve and Janal Lorence

Diablo Canyon EIR Project

From: Steve Lorence [stevelorence@hotmail.com]
Sent: Friday, April 22, 2005 8:27 AM
To: diablocanyon@aspenerg.com
Subject: Diablo Canyon Draft EIR Comment in Support

From : <postmaster@mail.hotmail.com>     [Inbox](#)
Sent : Thursday, April 21, 2005 8:05 PM
To : stevelorence@hotmail.com
Subject : Delivery Status Notification (Failure)

Dear Mr. Andrew Barnsdale:

We have reviewed the draft EIR for the Diablo Canyon Steam Generator Replacement project and have decided that Pacific Gas and Electric should be allowed to proceed with the project. They have met all conditions and the money is well spent on this project. It is a cost effective and environmental friendly project. We request that the CPUC approve the project ASAP.

7-1

Thank you for taking our comments.

Steve and Janal Lorence
807 Meadowlark
Arroyo Grande, CA 93420

5/6/2005

Responses to Comment Set 7
Steve and Janal Lorence

7-1 The commenters' support for the Proposed Project is noted.

Comment Set 8
George E. Galvan

April 17, 2005

Andrew Barnsdale
CPUC, c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Mr. Barnsdale,

This letter is written in support of PG&E's request to be allowed to go ahead with their plans to replace the existing steam generators. The EIR that has been released by the California Public Utilities Commission discloses the environmental impacts expected as a result of this project.

8-1

I would only like to address the unloading of the replacement steam generators. Based on the EIR, both points of unloading would meet the needs of PG&E. As an interested party I would suggest the unloading be accomplished at the Diablo Cove. At this point it would have no adverse effects to the operations at Port San Luis, or to the users of the Pier at the Port, and also have no impact on traffic into or out of Port San Luis.

8-2

Thank you for taking my comments into your consideration of the approval of the replacement the steam generators at Diablo Canyon.

Sincerely,



George E. Galvan
14825 El Camino Real
Atascadero, CA 93422

Responses to Comment Set 8

George E. Galvan

- 8-1 The commenter's support for the Proposed Project is noted.
- 8-2 The commenter's support for the use of the DCPP Intake Cove, instead of Port San Luis for RSG delivery and offloading is noted. The RSG Offloading Alternative at the Intake Cove is the environmentally superior alternative for the Proposed Project as stated in Sections ES.1 and ES.4.2.5 of the Draft EIR.

Comment Set 9
Betty McElhill

Diablo Canyon EIR Project

From: Betty McElhill [bmcclhil@slonet.org]
Sent: Friday, April 22, 2005 4:11 PM
To: diablo Canyon@aspeneq.com
Subject: Comments on Draft EIR

Comments on Draft EIR
Proposed Diablo Canyon Power Plant Steam Generator Replacement Project

From: Betty McElhill
2440 Coburn Lane, #7
Pismo Beach, CA 93449

bmcclhil@slonet.org

To: diablo Canyon@aspeneq.com

The steam generators are used in a nuclear power plant. Thus the greatest environmental hazard is from nuclear contamination. The statement "CPUC is preempted from imposing upon the operators any requirements concerning radiation hazards and nuclear safety." (Noted on page ES-24 of the Draft Summary) renders this study useless in determining environmental impact for replacing the steam generators at the Diablo Canyon Power Plant.

9-1

The study however, gives multiple examples of dangerous conditions that would be created or already exist at the plant site. Examples include

9-2

"Greater likelihood of being affected by potential bluff instabilities over Diablo Creek" ES-50

"- more likely to be affected by overflow Diablo Creek" ES-50

"- less likely of hazardous material spill during transportation – shorter distance to OSG Storage Facility" ES51

- more potential/less likely for exposure to general public (depending on alternative) ES-51

- greater likelihood/reduced likelihood of encountering unstable locations during transport ES-48

- greater distance/close to potential landslide area at Patton Cove ES-49.

In fact, the report acknowledges that the OSGs are nuclear hazards. Replacement of the OSGs with new steam generators will, of course, create more OSGs. And more waste fuel. And increased potential for nuclear accidents for ten to thirty years beyond the replacement date.

9-3

Nuclear accidents not only affect people close by, but those thousands of miles from the accident. The affects are long term. It is senseless to spend funds on an environmental impact report that does not consider nuclear safety and radiation hazards.

9-4

5/6/2005

Responses to Comment Set 9

Betty McElhill

- 9-1 The ongoing risk of accidents related to radioactive material handling or production of spent nuclear fuel waste occurs in the environmental baseline (Draft EIR Section D.1.2.1), and as the comment notes, this aspect of DCPP operation is under exclusive regulation by the federal government (Draft EIR Section D.1.2.5). Section D.1.2.1 illustrates that the environmental impacts of short-term steam generator replacement activities and the long-term presence of the OSG Storage Facility are the subject of this analysis. The Proposed Project would not change the ongoing baseline risk of nuclear accidents. Section D.12.3.4 identifies the potential impacts to public safety caused by removing and storing the OSGs under the Proposed Project. Please also see Master Response MR-3 (Jurisdiction).
- 9-2 The “dangerous conditions” referenced in the comment are actually environmental advantages or disadvantages of the Proposed Project or the alternatives, not potential impacts. These conditions have not occurred and could only occur if the Environmentally Superior Alternative is not selected. Mitigation measures identified throughout the analysis would address the impacts related to all alternatives. Tables ES-6 (pages ES-55 – ES-59) and ES-7 (pages ES-60 – ES-64) in the Draft EIR summarize the impacts for the Proposed Project as compared to the alternatives.
- 9-3 The Draft EIR acknowledges that the OSGs are defined as Class A low-level radioactive waste (Section D.12.2). This means they would be contaminated with the lowest regulated concentration of radioactivity. Aside from the OSGs that would be placed in the OSG Storage Facility as a result of the Proposed Project, no other OSGs would be created by the Proposed Project or at any foreseeable point in the future. The replacement steam generators are for the purpose of allowing the plant to operate through the current license term. The nuclear waste generated and stored during the license period has already been analyzed and authorized under the current operating licenses. The NRC would evaluate post-license spent fuel waste and storage issues in any future relicensing application.
- 9-4 As noted in Response 9-1 above, the ongoing risk of nuclear accident at DCPP occurs in the environmental baseline. Please also refer to Master Responses MR-1 (Baseline) and MR-2 (License Renewal); and Responses CC5-14 and 4-1.

Comment Set 10
Gabor Bethlenfalvay



CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC)

Comments on Draft EIR

Proposed Diablo Canyon Power Plant Steam Generator Replacement Project

Tuesday, April 19, 2005

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Please do not waste my money on extending
the life of the DCPP. Spend it on building
a natural gas plant and on Hydrogen research
G. Bethlenfalvay

10-1

**Please print. Your name, address, and comments become public information and may be released to interested parties if requested.*

Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert additional sheets if needed. Comments must be postmarked by May 5, 2005. Comments may also be faxed to the project hotline at (805) 888-2750 or emailed to diablocanyon@aspeneg.com.

Responses to Comment Set 10

Gabor Bethlenfalvai

- 10-1 The comment opposes the Proposed Project and prefers the No Project Alternative and especially supports exploring hydrogen fuel options. CEQA does not address cost in the evaluation of the Proposed Project or alternatives, as noted in Draft EIR Section A. Section C.6 describes the potential sources of replacement generation for DCPP including combined cycle gas turbine power plants that could be used if DCPP must be shut down. The State of California has established an initiative for developing hydrogen fuel options (<http://www.hydrogenhighway.ca.gov>).

Comment Set 11
Marina Bethlenfalvay



CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC)

Comments on Draft EIR

Proposed Diablo Canyon Power Plant Steam Generator Replacement Project

Tuesday, April 19, 2005

Name*: Marina Bethlenfalvay
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In considering the environmental impact of the proposed replacement of the Diablo Canyon steam generators, it is insufficient to address only the immediate impact of the replacement procedure and disposal of the old generators. The real issue here is the continued operation of the nuclear power plant and its longterm impact on the environment. Given the enormous cost of this replacement, the possibility of re-licensing looms and with it the prospect of many years of increasing amounts of radioactive waste which are hazardous in any case and constitute a completely unacceptable risk in view of the new perceptions

- ① re. the seismic situation since the Dec. 2003 earthquake
 - ② the threat of terrorism after 9/11
- I strongly urge the CPUC not to approve the proposed replacement

*Please print. Your name, address, and comments become public information and may be released to interested parties if requested.

Marina Bethlenfalvay

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11-1

11-2

11-3

Responses to Comment Set 11

Marina Bethlenfalvay

11-1 Please refer to Master Responses MR-1 (Baseline) and MR-2 (License Renewal), as well as Response A-1, for a discussion of continued DCPP operation.

11-2 Please refer to Master Response MR-1 (Baseline) for a discussion of the Proposed Project's environmental baseline, which includes ongoing spent fuel through the current license term, and MR-2 (License Renewal) for a discussion of license renewal. Section D.12.1 (page D.12-12) of the Draft EIR discusses Facility Security and Terrorism Issues as it relates to the environmental baseline at DCPP. Section D.12.3.4 (page D.12-22) of the Draft EIR specifically acknowledges potential, less than significant (Class III) radiation exposure impacts that could occur during the removal, transport, and storage of the OSGs. Impact S-6 (A terrorist attack could result in damage to the OSG Storage Facility with a subsequent release of radioactive material) addresses radiation exposure due to residual contamination, and damage to the OSG Storage Facility from a terrorist attack. The potential radiation exposure from this impact is less than significant because the dose rates would all be well below the appropriate protective dose rates set by federal regulations. Refer to Section D.12.2 for more information regarding applicable regulations, plans and standards.

The exposure of existing DCPP facilities to known seismic hazards is also a facet of the environmental setting (as described in Section D.5.1.4). Impact S-5 (Seismic activity could compromise the integrity of the OSG Storage Facility) in Section D.12.3.4 of the Draft EIR addresses seismicity as it relates to public safety at the DCPP site (see page D.12-24). See Responses PG-124 and PG-125 for additional information on how the OSG Storage Facility would be designed to safely withstand seismic effects. In addition, this Final EIR includes Mitigation Measure G-3a, which addresses how structural design of the OSG Storage Facility should be based on consideration of recent earthquake data, but as noted in Section D.1.2.5, the seismic safety of the remainder of DCPP in its current design is within the jurisdiction of the NRC.

11-3 The commenter's opposition to the Proposed Project is noted.