

# **PUBLIC SCOPING REPORT**

## **Pacific Gas and Electric Company's Proposed Diablo Canyon Power Plant Steam Generator Replacement Project**

**Application No. 04-01-009  
SCH No. 2004101001**



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# 1. Overview of Public Scoping Process

## 1.1 Introduction

Pacific Gas and Electric Company (PG&E) has filed an application with the California Public Utilities Commission (CPUC) for the proposed Diablo Canyon Power Plant Steam Generator Replacement Project. The CPUC has determined that an Environmental Impact Report (EIR) is required to evaluate the project under the California Environmental Quality Act (CEQA).

According to PG&E, the proposed project is needed to allow Diablo Canyon Power Plant (DCPP) to continue to supply electric power for the remainder of its Nuclear Regulatory Commission (NRC) granted licenses, and to prevent the loss of this major power source to California electricity users. New replacement steam generators (RSG) are needed to replace the current original steam generators (OSG) that are approaching the end of their operating life due to tube degradation and other associated maintenance difficulties. The proposed project would include four major components, as described below.

### Transportation of the Replacement Steam Generators to DCPP

The replacement steam generators would be transported by a heavy load ship to a California port (Long Beach or San Pedro) where they would be transferred to a barge. From the barge, the replacement steam generators would be delivered to Port San Luis, where they would be unloaded. The steam generators would then be transported by land from Port San Luis to the DCPP Avila gate and then along the 7-mile DCPP access road to a proposed temporary storage facility.

### Replacement Steam Generator Preparation and Staging

PG&E would use existing DCPP facilities to the greatest extent practicable for the various preparation and staging activities necessary to prepare the steam generators for installation. However additional temporary facilities would need to be constructed within a Temporary Staging Area (TSA) to support other design, staging, and preparation activities. Office space, warehouse, mock-up, weld-testing, and laydown areas would be constructed within the TSA to accommodate most project activities.

Prior to their installation, the replacement steam generators would be staged in the temporary replacement steam generator storage facility within the TSA. In this storage facility, the replacement steam generators would be prepared for installation and housed until the fuel outage during which the replacement would occur. The temporary warehouse and laydown area would be used for the storage of required materials and to provide additional space to temporarily stage any materials. Mock-up facilities would be used to train personnel in techniques used to remove and install the steam generators. Additional team office space, containment access facilities, security processing facilities, decontamination facilities, and parking would also be required within the project site.

## **Original Steam Generator Removal, Transportation, and Storage**

Original steam generator removal includes staging at DCPD and transportation of the original steam generators to a new on-site storage facility to house the OSGs for the remaining life of the power plant. Several steps are associated with removal, transportation, and storage of the original steam generators.

- **Removal and Replacement of Steam Generators.** The original steam generators would be removed intact through the equipment hatches of each containment structure. The original steam generators would be removed from the containment buildings using a polar gantry crane and electrically powered hydraulic cranes. A steel runway system would enable transport of the steam generators out of the containment buildings through the equipment hatch and onto a hydraulic platform trailer that would move the original steam generators over the auxiliary building roof and through the fuel handling building. Finally, each original steam generator would be lowered onto a transporter and secured for transfer to the new on-site storage facility.
- **Storage of Original Steam Generators.** PG&E determined the least-cost method of original steam generator disposal to be on-site storage for the remainder of the plant life and subsequent decommissioning with the remaining plant equipment. This procedure would be conducted in accordance with applicable NRC regulations. Proper storage of the original steam generators would involve exterior decontamination and application of a protective plastic coating to prevent loss of loose material and long-term storage in a facility designed to block the dispersion of gamma rays.

## **Replacement Steam Generator Installation**

During the staging period, preparatory work would be performed on the replacement steam generators by the installation contractor in the temporary storage facility. After transporting each replacement steam generator from the temporary storage facility and installing it in essentially the reverse method by which the original steam generator was removed, each replacement steam generator would be fitted and welded to the reactor coolant system loops. After each steam generator is attached, PG&E would install supports, and weld main-stem piping and other connections.

## **1.2 Public Scoping for the Diablo Canyon Power Plant Steam Generator Replacement Project**

In compliance with the CEQA Guidelines, a Notice of Preparation (NOP) was sent to interested agencies and members of the public on October 1, 2004. Addressees included persons at 48 private companies/groups, 37 public agencies/districts/groups, and 142 individuals of the public. The scoping process allows government agencies and the public an opportunity to provide comments on the issues and scope of the EIR. The review period for the NOP ended on November 8, 2004; an eight-day extension was provided to allow more time for receipt of written comments. Comments received during the scoping process are part of the project record, and they have been reviewed and will be considered by the CPUC in determining the appropriate scope of issues to be addressed in the EIR.

In addition to receipt of written comments, the CPUC held three public scoping meetings in October 2004 in order to provide the public and governmental agencies with information on the CEQA process and an opportunity to identify environmental issues and alternatives for consideration in the EIR. Public scoping meetings were held at the following locations and times:

- October 13 – 10:30 a.m. to 1:30 p.m., California Public Utilities Commission, 505 Van Ness Avenue, San Francisco.
- October 27 – 2:30 to 4:30 p.m., San Luis Obispo County Library, 995 Palm Street, San Luis Obispo.
- October 27 – 7:00 to 9:00 p.m., San Luis Obispo County Library, 995 Palm Street, San Luis Obispo.

Approximately 110 members of the public and representatives from organizations and government agencies attended the three scoping meetings. A total of 67 written comments were received during the NOP scoping process and 54 individuals provided verbal comments (52 at the scoping meetings and 2 via the project voice mailbox). The input received during the scoping process will assist the CPUC in identifying the range of actions, alternatives, environmental issues, and potential effects associated with the proposed project. All issues raised in the scoping meetings will be reviewed by the CPUC to determine their appropriateness for consideration and analysis in the EIR.

### 1.3 Public Notification

Public notification regarding the EIR and the scoping meetings included publication of newspaper notices and mailing of the NOP. Notice for the public scoping meetings was published in the *San Luis Obispo Telegram-Times* on October 18 and October 24, 2004. The same information was published in the *Five City Times* on October 13 and October 20, 2004. The NOP was mailed to 303 interested or affected parties, including residents and persons at public agencies, private organizations, and interest groups. Appendix A contains copies of the NOP and mailing list.

### 1.4 Agency Notification

The NOP was sent to federal, State, and local trustee and responsible agencies that could be affected by the proposed project. Distribution of the NOP included four federal agency departments, eleven State agency departments, twelve county departments, five city departments, two Native American groups, and five special districts.

The NOP was also available on the CPUC's environmental website for the project at: <http://www.cpuc.ca.gov/environment/info/aspen/diablo Canyon/diablo Canyon.htm>. In addition, PG&E's Proponent's Environmental Assessment (PEA) and Application were made available on the same website.

### 1.5 CEQA Process Beyond Scoping

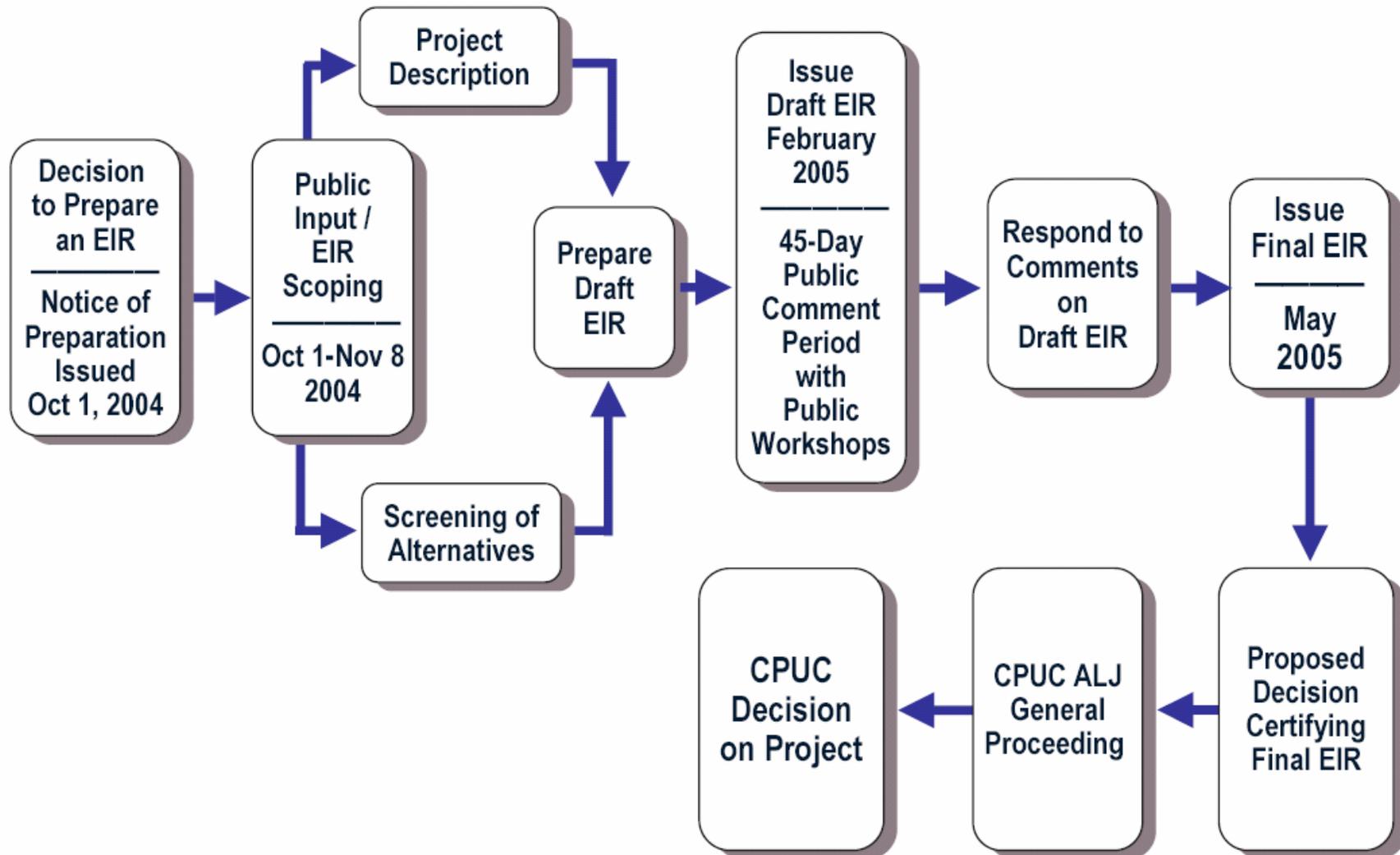
The scoping process documented in this report is the first step of the EIR process that will culminate with the issuance of Draft and Final Environmental Impact Reports (EIRs) evaluating the proposed project. The Diablo Canyon EIR process and the approximate anticipated schedule for future actions are illustrated in a flowchart in Figure 1-1. This Scoping Report falls under the second item (Public Input/EIR Scoping) in the process flowchart.

### 1.6 Scoping Report Organization

This scoping report summarizes the comments and issues identified through the NOP scoping process, including the public scoping meetings. The remainder of this report is organized as follows:

- **Section 2** provides an overall summary of the comments and issues.
- **Appendix A** provides the scoping meeting and notification materials, including:
  - A-1: Notice of Preparation (NOP)
  - A-2: NOP Mailing List
  - A-3: Scoping Meeting Materials
- **Appendix B** provides summaries of verbal comments received at the scoping meetings
  - B-1: Summary of Oral Comments Received at the October 13, 2004 Scoping Meeting
  - B-2: Summary of Oral Comments Received at the October 27, 2004 Afternoon Scoping Meeting
  - B-3: Summary of Oral Comments Received at the October 27, 2004 Evening Scoping Meeting
- **Appendix C** includes the letters received in response to the NOP
  - C-1: Comments from Government Agencies
  - C-2: Comments from Private Organizations and Companies
  - C-3: Comments from Private Citizens

Figure 1-1. Diablo Canyon Power Plant CEQA Process





## 2. Summary of Public Comments

This section summarizes the comments raised by the public and agencies during the scoping process for the Diablo Canyon Power Plant (DCPP) Steam Generator Replacement Project EIR. This summary is based on both written and oral comments that were received during the NOP review period, which ended on November 8, 2004. It also includes comments received at a scoping meeting conducted at the CPUC in San Francisco and two scoping meetings held in San Luis Obispo in October 2004.

A total of 67 written and 54 verbal comments (52 at scoping meetings and 2 via the project voice mailbox) were received during the scoping process from federal, State, local, and county government agencies, school districts, non-profit organizations, and concerned members of the public. Private citizens and advocacy groups provided the majority of the comments. In addition to private individuals, comments were received from the following organizations:

- California Polytechnic State University, San Luis Obispo
- Citizens for Safe Access to Essential Services and Safe Milieus
- Community Food System Project of SLO County
- Grueneich Resource Advocates (for SLO Mothers for Peace, Sierra Club, Greenpeace, Public Citizen, Environment California)
- Life on Planet Earth
- Pacific Gas and Electric Company
- San Luis Obispo Green Party
- San Luis Obispo Mothers for Peace
- Sierra Club, Santa Lucia Chapter
- Zero Tolerance for Denied Shelter

Comments were also received from the following government agencies:

- California Coastal Commission
- CDF/San Luis Obispo County Fire Department
- CPUC Office of Ratepayer Advocates
- Port of San Luis Harbor District
- San Luis Obispo County Air Pollution Control District
- San Luis Obispo County Department of Planning and Building

Appendices B and C contain a summary of all oral and a copy of written comments received.

The specific issues raised during the public scoping process are summarized according to the following major themes:

- Purpose and Need
- Human Environment Issues and Concerns
- Physical Environment Issues and Concerns
- Alternatives
- Environmental Review and Decision Making Process

## **2.1 Purpose and Need**

A clear majority of comments received by members of the public and community organizations addressed the purpose and need of the proposed project. Many of these comments expressed opposition to the existence of DCPP and to the use of nuclear power in general. Many people stated that they preferred the shutdown of DCPP and discontinuing the use of nuclear power as a generation source in favor of utilizing natural gas power plants, or alternative and renewable energies such wind, solar, and wave power. It was generally understood by persons and organizations commenting that without the CPUC's approval of the proposed project, DCPP would continue to operate only until the existing steam generators reached the end of their operating lives.

### **Costs to Ratepayers**

Many private citizens were opposed to incurring the additional costs associated with steam generator replacement, particularly passing those costs on to the ratepayers. These commenters generally expressed the belief that the community should be given more electricity source options and that their utility payments to PG&E should not be used to support the continued operation of DCPP. In addition, some comments alleged that the costs of the proposed project were severely and deliberately understated by PG&E by neglecting to include future financial and human health/safety costs created with approval of the project.

## **2.2 Human Environment Issues and Concerns**

Nearly all of the public and agency comments raised strong concerns regarding the potential impacts of the project on the human environment, most often expressing concerns regarding the security of the power plant, adequacy of emergency services in the event of an accident, and the public health and safety risks associated with the on-site storage of nuclear waste. These concerns were often interrelated because the security of DCPP affects the need for and the adequacy of emergency services in the event that an incident directly impacts public health and safety. Other concerns dealt with transportation and traffic issues.

### **Transportation and Traffic**

Comments regarding transportation and traffic were submitted by public agencies and citizens. Concerns were expressed regarding the impact of replacement steam generator offloading at Port San Luis on marine traffic including the homeport fleet and fishing vessels. Potential project impacts on Avila Beach Drive were also addressed in agency comments. Comments requested a traffic analysis to assess road fees and to develop a trip reduction plan. Individuals also expressed concern about increased traffic in the Port San Luis area, particularly on Avila Beach Drive, and suggested the establishment of a busing program to shuttle workers between offsite parking locations and DCPP.

### **Emergency Services**

Numerous public comments expressed concern regarding the adequacy of DCPP's emergency alert system and emergency response services. Some local residents expressed concern that the DCPP Early Warning System sirens were inaudible at certain locations. The effectiveness of San Luis Obispo County's disaster evacuation plan was addressed in several comments. Concerns were raised about those members of the public that could be especially affected by inadequacies in the evacuation plan such as those

without immediate access to transportation, including prison inmates, the homeless, and hospital patients. Comments submitted by County agencies addressed the importance of coordinating with the California Department of Forestry and Fire Protection/San Luis Obispo County Fire Department to install or update emergency protection and response equipment. In addition, an evaluation of the project impacts on fire, hazardous materials release, or other emergency potential was requested.

## **DCPP Security**

Based on the comments received, it is evident that the security of DCPP is important to private citizens in the vicinity of DCPP. Many comments identified DCPP as a potential terrorist target and questioned the adequacy of current security measures in place at the plant. These security concerns centered on the existing facility, as well as the dry cask spent fuel storage facility that is scheduled to be built in the future.

## **Public Health and Safety**

Many of the comments received from private citizens and community organizations expressed concerns regarding public health and safety in the event of a hazardous materials release following a terrorist attack or other incidents that might result in the release of radioactivity. The main reason many individuals were opposed to the project was because of concerns related to the immediate and long-term effect of a radiation release to the public and the surrounding environment. Sources for a release were thought to be fuel currently being used in the reactors, spent fuel stored in high-densities in the storage pool, and spent fuel that could be stored on-site in dry casks in the future. Other comments identified the need for employees who work on-site at DCPP to be tested for exposure to radioactivity as a result of their daily work activities.

## **2.3 Physical Environment Issues and Concerns**

The comments from public agencies, community organizations, and private citizens expressed concerns about the potential impacts that the project may have on the physical environment, particularly impacts to air quality and marine biology. In addition, concerns were also raised about the geologic stability of the area and whether the proposed project or its associated facilities would be negatively affected in the event of an earthquake.

### **Air Quality**

Public agency comments conveyed substantial concern for impacts to air quality during the transport and construction phases of the steam generator replacement project. Potential air quality impacts mentioned included fugitive dust, air emissions due to increased commuter vehicle trips, and combustion emissions due to heavy-duty equipment. It was suggested that an air quality analysis be completed in order to properly evaluate potential short- and long-term impacts from the proposed project. These comments also identified the need to avoid or minimize adverse impacts of the proposed project through mitigation measures such as a trip reduction program, use of Air Resource Board (ARB) certified fuel and equipment, and limitation of engine idling. The San Luis Obispo County Air Pollution Control District expressed that its preferred delivery location for the replacement steam generators would be the DCPP Intake Cove, which would reduce the risk to residents of Avila Beach, and that use of Port San Luis for steam generator delivery necessitates completion of a Human Health Risk Assessment to evaluate the inhalation risks due to the proposed project and other cumulative risks in the area.

## **Marine Issues**

A major concern conveyed by non-profit organizations and members of the public was the perceived continuous violations of the National Pollution Discharge Elimination System (NPDES) by DCPP and the resulting impact on the marine environment. Other concerns addressed in the comments included the impacts of DCPP's once-through cooling system on marine organisms and habitat quality. The major impacts mentioned included impingement and entrainment of marine organisms and the loss and degradation of marine habitat due to outflow of warm water from the DCPP cooling system. Other comments indicated that the environmental analysis should consider the recent, more stringent U.S. EPA regulations regarding outflow of thermal cooling water from power plants.

## **Geology and Seismic Activity Issues**

Two recent seismic events, and the existence of new seismic information and technology prompted some members of the public to assert that there is greater potential for an earthquake in the vicinity of DCPP, and higher risk of damage to DCPP infrastructure due to design standards that are now outdated. Other comments demanded that the results of recent PG&E-conducted seismic studies be included and evaluated in the EIR, that the document be peer reviewed by an independent expert geologist or geologic agency, and that all studies be released to the public.

## **2.4 Alternatives**

Comments from individuals, non-profit organizations, and government agencies suggested a variety of alternatives, including the No Project Alternative and alternate transport routes for the steam generators.

### **No Project Alternative**

Many comments from private citizens and non-profit organizations supported the No Project Alternative. The public comment period produced suggestions for alternative generation methods in the event the proposed project is not approved by the CPUC. These suggestions included the following:

- Re-purpose the facility to be a combined-cycle natural gas power plant;
- Supplement natural-gas powered electricity generation with renewable energy sources such as wind, solar, and wave power; and
- Use a combination of renewable energy generation techniques to replace lost generation.

Some of the comments submitted were supplemented with case studies of other nuclear power plants that had been re-purposed or written testimony and other media illustrating the feasibility and efficiency of renewable generation.

### **Steam Generator Transport and Storage Alternatives**

Due to PG&E's thorough investigation of feasible project alternatives, there were few original suggestions for steam generator transport or storage alternatives. The only new alternative proposed was the idea of using bunkered storage for the OSGs instead of constructing an aboveground facility. General comments addressed the need to fully analyze all of PG&E's proposed options.

## 2.5 Environmental Review and Decision Making Process

### 2.5.1 Scope of Project Description

Concerns regarding the scope of the project description were frequently addressed in the written comments submitted. The comments overwhelmingly identified the extension of the operating life of the DCPP and the associated cumulative impacts of long-term operations as a critical issue that should be included in the project description. This issue is discussed further in the following section. In addition to the inclusion of extension of DCPP operating life, those that submitted comments identified other issues that should be included in the EIR project description. Some comments stated that the steam generator replacements should not be isolated from other DCPP maintenance repairs that may need to be conducted in the future. These comments often asserted that evaluating only the replacement of the steam generators would serve to ignore the potential cumulative impacts of other plant projects and maintenance procedures. Other issues requested for inclusion in the project description were:

- New seismic information regarding faults in the vicinity of the DCPP;
- Evaluation of potential enhanced security requirements;
- Effects of 39% of PG&E's workforce becoming eligible for retirement during the proposed project;
- Possibility of U.S. Nuclear Regulatory Commission (NRC) license renewal; and
- Long-term effects of nuclear waste storage on-site.

#### Extension of Life and Cumulative Impacts

A major issue addressed in the comments was the issue of extension of the life of the DCPP and the associated cumulative impacts from long-term operation. The proposed project is generally viewed by the public as a means to extend the operating life of DCPP. Many comments expressed dismay that the project description does not include the change in long-term impacts associated with potentially enabling the plant to operate until the expiration of the NRC license in 2021 and 2025 instead of 2013, which is the date the first steam generator is estimated to cease operations should the project not be approved. Cumulative impacts associated with the extension of power plant life that were identified in comments included the disposal of additional increments of spent fuel and other waste, and the additional costs required to operate the plant beyond the life of the original steam generators.

#### Notice of Preparation

Some comments expressed dissatisfaction with the scope of the project description as it is written in the NOP. The majority of these comments asserted that the issue of extension of power plant life should be included in the project description and therefore analyzed in the EIR. A few comments requested the re-issuance of a revised NOP that includes the aforementioned issues.

### 2.5.2 Jurisdiction

Many comments from public agencies provided recommendations regarding which agencies must be consulted and the permits PG&E would be required to obtain in order to proceed with the proposed project. Comments identified the following major regulations applicable to the project: the California Coastal Act, San Luis Obispo County's Local Coastal Plan, and Air Pollution Control District's Clean Air Plan. Some agency comments claimed that the County of San Luis Obispo should be the lead agency or the co-lead agency with CPUC. Other comments inquired about the NRC's role in the proposed project.



## **APPENDIX A**

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### **Notification and Scoping Meeting Materials**

- A-1. Notice of Preparation (NOP)
- A-2. NOP Mailing List
- A-3. Scoping Meeting Materials

## **APPENDIX A-1**

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### Notice of Preparation (NOP)

## **APPENDIX A-2**

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### NOP Mailing List

## **APPENDIX A-3**

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### Scoping Meeting Materials

## **APPENDIX B**

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### Summary of Scoping Meeting Comments

- B-1. Summary of Oral Comments Received at October 13, 2004  
Scoping Meeting
- B-2. Summary of Oral Comments Received at October 27, 2004  
Afternoon Scoping Meeting
- B-3. Summary of Oral Comments Received at October 27, 2004  
Evening Scoping Meeting

## **APPENDIX B-1**

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Summary of Oral Comments Received  
at October 13, 2004 Scoping Meeting

## **APPENDIX B-2**

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Summary of Oral Comments Received  
at October 27, 2004  
Afternoon Scoping Meeting

## **APPENDIX B-3**

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Summary of Oral Comments Received  
at October 27, 2004  
Evening Scoping Meeting

## **APPENDIX C**

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### Comment Letters Received in Response to NOP

- C-1. Comments from Government Agencies
- C-2. Comments from Private Organizations and Companies
- C-3. Comments from Private Citizens

## **APPENDIX C-1**

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### Comments from Government Agencies

## **APPENDIX C-2**

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### Comments from Private Organizations and Companies

## **APPENDIX C-3**

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### Comments from Private Citizens