Comment Set 17
Sharon L. Hoffman

San Onofre EIR Project

From: Sharon L. Hoffman [shoffman@techreflections.com]
Sent: Tuesday, May 31, 2005 2:57 PM
To: sanonofre@aspeneg.com
Cc: Russ Hoffman
Subject: Comments on DEIR 2004101008 (A.04-02-026)

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

Dear Mr. Barnsdale,

Please add this correspondence to the official public comments on DEIR 2004101008 (A.04-02-026), concerning steam generator replacement at San Onofre Nuclear Generating Station.

The idea that nuclear power plants and the people who build and run them are 100 percent perfect 100 percent of the time is ludicrous. We accept the probability that airplanes occasionally fall out of the sky -- even without the aid of terrorists. We accept that doctors make mistakes and people die. We accept that gas lines can leak and start fires. We do our best to protect ourselves and society from these dangers. We set standards for quality and investigate when people or parts fail to perform correctly. But we don't assume that perfection is the normal state of engineering or human beings. However, that's exactly what we're asked to believe about nuclear power facilities, because the consequences of failure are unacceptable. **17-1**

No amount of money can render nuclear waste safe. If one thimbleful was dispersed, it could force the permanent evacuation of a small city. The spent fuel created in just ONE DAY by California's four nuclear plants is over 500 pounds. If a single day's spent fuel were released into the environment, it would make all of Southern California a "hot zone" forever. Instead, the nuclear industry expects us to believe that they can contain all the waste PERFECTLY for far longer than any of humankind's creations have existed.

In asking the CPUC to allow continued operation at San Onofre, which is implied in the steam generator replacement project, SCE is asking the commissioners to believe in perfection. Assuming that the nuclear industry can deliver perfection is like not wearing your seat belt because you believe that you'll never make a mistake as a driver, your car will always function perfectly, and no other driver will ever make a mistake that will involve you in an accident. Even then, the consequences of your arrogance would be limited to a small number of people, but the nuclear industry's arrogance endangers everybody.

In just the past 50 years, society has seen many instances where an activity that was supposed to be harmless, or even beneficial, was later proven to be deadly. In many of these cases, people who tried to alert government and society to the potential hazards were ignored and dismissed, just as those who oppose nuclear power are ignored and dismissed today.

The history of prenatal x-rays illustrates that what we don't know CAN hurt us. Today, it's commonly accepted that women who are pregnant, or who might even POTENTIALLY be pregnant, should avoid x-rays except in the most serious emergency. But in 1956, when Dr. Alice Stewart published the first studies showing a link between prenatal x-rays and cancer, her findings were ignored by the medical establishment. This example has strong correlations with the danger from nuclear power plants, because

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medical x-rays -- like the radiation from nuclear plants -- are ionizing radiation, and because even after the proof was presented, most people believed the danger of radiation exposure from prenatal x-rays was insignificant -- just as many people today believe that the danger of radiation exposure from day-to-day nuclear power plant operations is insignificant. 17-1

Here is an except from a biography of Dr. Stewart (The Woman Who Knew Too Much: Alice Stewart and the Secrets of Radiation, University of Michigan Press, 1999, ISBN: 0-472-11107-8), that illustrates many aspects of the problem. (The quotes within the excerpt below, are from Dr. Stewart.)

********** beginning of excerpt **********

They published a fuller report in the *British Medical Journal* in July 1958. There, with an expanded database, they were able to conclude definitively that a fetus exposed to x-ray was twice as likely to develop cancer within the next ten years as a fetus that had not been exposed -- and not only leukemia, but all types of cancer. "We succeeded, within a three-year period, in tracing more than 80 percent of all childhood cancer deaths that had occurred in England between 1953 and 1955, which was a miracle considering that we had no money.

"We reckoned that a child a week was dying from this practice, which isn't all that many -- though any death caused by a medical practice is very much the wrong side of the tally. We thought that doctors would stop x-raying on the mere suspicion that we were right, and we felt we must hurry to cover all the deaths that occurred in the next ten years, because once they stopped x-raying, there would be no further cases. We needn't have worried; they went right on x-raying, so we went right on monitoring. We went on and on and managed to include all children who died from 1953 onwards. It was a full-time job and kept me close to the data collecting. We spent the next twenty years proving we were right, and we did prove it -- that a single x-ray, a fraction of a permissible exposure, was enough to double the chance of an early cancer. We emerged after twenty years with a genuine finding -- there could be no mistake.

"But it was a very small effect that we'd picked up, and if we hadn't stumbled on it, I doubt that anyone would have."

********** end of except **********

The specific cause of any PARTICULAR cancer or birth defect is difficult to prove, but the STATISTICAL data is compelling. If those in authority had listened to Dr. Stewart, many lives could have been saved. Similarly, despite protestations to the contrary by the nuclear industry, proof exits today that even "routine releases" from nuclear power plants cause cancer, birth defects, and other ailments such as heart disease. The nuclear industry likes to say that nobody has ever died from commercial nuclear power in the United States. In fact, many people have already died and many more will die because of radiation exposure they have already received from nuclear power plants.

To allow steam-generator replacement paves the way for relicensing and tacitly allows the continued release of radioactive pollutants into the environment on an ongoing basis. Allowing steam generator replacement also allows the plant operators to continue to create more nuclear waste without any prospect that it can be contained for its entire lethal deathspan, and it sets the stage for an accident -- large or small, sooner or later. We've been lucky, not smart, about nuclear power in this country. Davis-Besse, Three Mile Island, and Brown's Ferry could all have been so much worse.The prospect of an accident at San Onofre, whether from terrorism, carelessness, faulty engineering, or human error is too horrible to contemplate. But contemplate it we must, because ignoring it will not lessen the danger.

At the May 12, 2005 public hearings we were told that the DEIR does not consider the potential impacts of relicensing of San Onofre beyond its current license period. We were also told that this exclusion is because SCE has not "officially" applied for a new license to generate nuclear waste and spew it into the 17-2

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environment of Southern California. However, at the May 17, 2005 meeting, Commissioner Brown concurred with the assessment expressed by many citizens -- that if the CPUC approves the steam generator replacement project, SCE will apply for relicensing at San Onofre. If the CPUC allows the steam generator replacement project to proceed, the commissioners are accepting responsibility for all of the death, suffering, and economic devastation that might result from continued operations or an accident at San Onofre. 17-2

Plenty of evidence has been presented to the CPUC in the DEIR hearings to show that the current situation is dangerous, that the steam generator replacement process itself is dangerous, and that all of the electrical power California currently gets from nuclear plants can EASILY be replaced by renewable power sources. I ask the commissioners to deny SCE's application for steam generator replacement and shut down all of California's nuclear power plants immediately.

Sincerely,

Sharon L. Hoffman

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Responses to Comment Set 17
Sharon L. Hoffman

17-1 It is recognized that accidents may occur at nuclear power plants. For a discussion of baseline safety and risk of upset conditions at SONGS, please refer to Draft EIR Section D.12.1 and Master Response MR-1 (Baseline). Please also refer to Response 18-1 regarding safety issues at SONGS and to Response 16-2.

17-2 A full discussion of SCE's position on NRC license renewal and the NRC licensing process is presented in Draft EIR Section G, NRC License Renewal. Please also refer to Master Response MR-2 (License Renewal) and Response 16-3.

Comment Set 18
Lisa Weiss

May 31, 2005

Andrew Barnsdale
Project Manager of
CPUC c/o Aspen Environment Group

Dear Andrew,

I am a resident of San Clemente & I'm concerned about the possibility of trying to extend the life of the nuclear reactors as suggested by Edison, instead of using a combination of other energy resources such as solar, tidal & wind. 18-1

THESE REACTORS NEED TO BE SHUT DOWN, NOT EXTENDED!

San Onofre is especially vulnerable to terrorist attacks.
It is relatively close to the Mexican border where people stream into our country every day unnoticed. It is within close proximity to Camp Pendleton, a major base for our military. And it is mid way between two populated & very wealthy cities, San Diego & Los Angeles. This makes San Onofre a good, & easy target for terrorists for a number of reasons.

Also, after seeing what happened with the terrible tragedy of the tsunami victims. It strikes me as being unnecessarily dangerous to have a nuclear power plant on the edge of the Pacific Ocean in a place of America where earthquakes are expected. Nobody knows when the next big earthquake will occur but they know that it is due anytime & that it will be of large magnitude to relieve the pressure off of the San Andreas Fault. Our community is vulnerable to liquefaction & major damage is likely. The power plant is built on sand! We know we are due for a large earthquake & that damage is inevitable especially along our beaches and in our cities where high rise buildings are. That makes San Onofre especially vulnerable. If damage occurred to the tanks in an earthquake it might be impossible to get it fixed in the hours that follow. We have only ONE road, one artery of transportation, which is the 5 freeway. I think it is safe to say the possibility of damage to that freeway is highly likely! People in the tsunami areas knew the potential of a tsunami was there, they just didn't think it would ever happen to them. This is no place to have a nuclear power plant!

The world has changed since 9-11.
San Onofre is a vulnerable place for terrorists because of its location.
It is also vulnerable to damage from a major earthquake due to its location.
The reactors are old and worn out. They don't need to be revived. They need to be removed.

S.D.Gas & Electric's idea to use solar, wind, geothermal and other alternate energies is what all nuclear power plants should be converting to. We need alternate forms of energy that are good for our environment. California has always been a leader in innovative ways to protect the environment & lead the country into tomorrow. We have that opportunity now.

Edison must adopt the renewable track of SDGE. Please SAVE our communities.

Lisa Weiss (resident of San Clemente)

Responses to Comment Set 18
Lisa Weiss

18-1 The commenter's support for use of alternative energy sources such as solar, tidal, geothermal, and wind is noted. Alternative energy technology could not solely replace the base-load generation provided by SONGS, as stated in Section C.6.3 of the Draft EIR. For example, solar thermal and wind power are intermittent and unsuitable for base-load applications; however, they could be used as alternatives to peak-shaving power facilities as stated in Sections C.6.3.1 and C.6.3.3. Conversely, Section C.6.3.4 states that geothermal power can be used for base-load applications, but that power plants must be constructed near geothermal reservoir sites in order to prevent thermal energy loss, and must also have sufficient transmission lines connecting current or potential future sites to the service area. It is noted that the commenter supports the use of alternative energy as replacement generation for SONGS, and the No Project Alternative does not preclude the potential use of alternative energy sources. Throughout the Draft EIR, the potentially adverse effects of constructing new replacement generation and transmission facilities are described.

Facility security and terrorism issues exist in the environmental setting for SONGS, as described in Draft EIR Sections D.1.2.1 and D.12.1. Potential hazards associated with risk of terrorist attacks at the SONGS were discussed in Section D.12.1 of the Draft EIR. Since SONGS is an operating power plant, the risks of sabotage are considered to be part of the environmental baseline, or setting, as described in Draft EIR Section D.1.2.1. Impact S-5 (A terrorist attack could result in damage to the OSG Storage Facility with a subsequent release of radioactive material) in Section D.12.4.2 of the Draft EIR addresses terrorism as it relates to public safety at the SONGS site through the OSG Onsite Storage Alternative. However as described in the Executive Summary of the Draft EIR Section 3.1.5, aspects of nuclear and radiological safety are within the exclusive jurisdiction of the NRC. Please see MR-3 (Jurisdiction) for information on State authority regarding issues related to safety, plant operations and radiological materials.

The exposure of existing SONGS facilities to known seismic hazards and tsunamis is also a facet of the environmental setting, or baseline (as described in Section D.5.1.4). Impact S-6 (Seismic activity could compromise the integrity of the OSG Storage Facility) in Section D.12.4.2 of the Draft EIR addresses seismicity as it relates to public safety at the SONGS site under the OSG Onsite Storage Alternative. Mitigation Measure G-6a is a requirement for SCE to addresses how structural design of the OSG Storage Facility should be based on consideration of recent earthquake data, and the NRC would have ultimate authority to approve or disapprove that design. As noted in Section D.1.2.5, the seismic safety of the remainder of the existing SONGS facility in its current design is within the jurisdiction of the NRC, and for the Proposed Project, NRC oversight of the containment structure modifications would ensure that adverse safety impacts would be reduced to less than significant levels (Section D.12.3.4). Please also see Response PM1-11 for information on baseline tsunami hazards.

Comment Set 19
Alliance for Nuclear Responsibility – Signatories and Sample Letter

This submission consisted of 48 similar letters from the individuals listed below in the order supplied. One sample letter (4 pages) follows this sheet.

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Comment Set 19, cont.
Alliance for Nuclear Responsibility – Signatories and Sample Letter

3 Winterbranch
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92604
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Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site. 19-1

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

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The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

19-2

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants…De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [to] meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase…The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

19-3

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Alliance for Nuclear Responsibility – Signatories and Sample Letter

creating the containment opening could cause significant impacts." (B-22) "Emissions" is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California's coast in perpetuity. **19-3**

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered. **19-4**

The DEIR's finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects. **19-5**

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California's nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan. **19-6**

The DEIR's statement that "these [alternative] technologies do, however, cause environmental impacts, and they also have technical feasibility limitations" are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California's Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the "natural" decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities for this extended period. As it is, the DEIR focuses narrowly on seismic risks associated only with the steam generator replacement project, i.e. to the OSG storage site, etc. **19-7**

A key risk associated with the steam generator replacement project is the fact that the proposed OSG storage site is located at the base of a large landslide mass and on eroding coastal bluffs. The landslide could be re-activated and damage the OSG storage facility. The OSG's are low-level

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Alliance for Nuclear Responsibility – Signatories and Sample Letter

radioactive, and the integrity of the storage area is thus critical to prevent contamination of the surroundings.

19-7

As a mitigation measure, the DEIS prudently suggests conducting a geotechnical study of the proposed site to assess the landslide/slope stability risk in more detail and determine if the site needs to be moved, or if the site can be engineered appropriately. However, based on the geologic map, it looks like both the "preferred" and alternative OSG storage sites are in close proximity to the landslide mass and are therefore at risk. Thus, depending on the results of the geotechnical study, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Elaine Booth
csbooth1@cox.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

Responses to Comment Set 19
Alliance for Nuclear Responsibility

19-1 This comment asserts that the Draft EIR should have provided additional analysis of impacts that would have the potential to occur as a result of the continued operation of the SONGS facility after implementation of the Proposed Project. Please refer to Master Response MR-1 (Baseline) for information on how ongoing operation of SONGS is related to the Proposed Project.

The operating SONGS nuclear power plant and the operating licenses for Units 2 and 3, which expire in 2022, are part of the "environmental baseline." Section D.1.2.1 and other areas of the Draft EIR provide a summary of the existing baseline conditions at SONGS, and as required by CEQA, these conditions are the context in which the impacts of the Proposed Project must be considered. CEQA Guidelines Section 15125 states that the EIR must include a description of the physical environmental conditions as they exist at the time the Notice of Preparation is published. The baseline, or existing physical conditions, here, properly include a power plant duly authorized to operate through 2022. The Draft EIR appropriately acknowledges that plant operations would cease if the steam generators are not replaced, and the effects of this change, including many beneficial effects, were described in the analysis of the No Project Alternative.

The comment also requests that the EIR evaluate the economic costs of the Proposed Project. CEQA does not evaluate economic-related impacts except in a very limited manner. CEQA Guidelines Section 15064(e) indicates that economic changes resulting from a project shall not be treated as significant effects on the environment. Economic changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic effects of a project, the physical change may be regarded as a significant effect. There would be no such physical changes here. Generally, cost issues of the project and alternatives are addressed by the CPUC decision-makers in their evaluation of the General Proceeding (A.04-02-026) for the Proposed Project.

19-2 The comment identifies several areas where the Alliance for Nuclear Responsibility expects more detail. This comment is addressed in Response CC4-5.

19-3 The comment notes that certain beneficial effects would be realized with adoption of the No Project Alternative. This comment is addressed in Response CC4-6.

19-4 The comment addresses the economics of the Proposed Project. Issues related to project cost and ratepayer benefit, or lack of benefit, 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 analyzed in this EIR with the economic consequences of cost recovery that would be borne by the ratepayers. Section A.5 of the Draft EIR describes how the CPUC uses non-environmental information in the decision-making process.

Section C.6.3 of the Draft EIR describes the various alternative energy technologies that include solar thermal, photovoltaics, wind turbines, geothermal power, hydroelectric power, biomass power, fuel cells; and system enhancements including demand-side management

and distributed generation. There is currently no available alternative technology that can solely replace SONGS's 2,150 MW of base-load generation capacity in the intervening time period before SONGS would need to shut down.

19-5 The comment declares that NRC license renewal would be more likely with the Proposed Project. Please see Master Response MR-2 (License Renewal).

19-6 The comment asserts that the Proposed Project would be contrary to policies of the State regarding renewable resources; however, because operation of SONGS through the end of the NRC licenses is an aspect of the environmental setting, there would be no change to the State's current energy resource mix. The Proposed Project is replacement of steam generators, not plant operations. Replacement energy sources are considered, where appropriate, as part of the No Project Alternative. The State's renewable resources policies may be considered by the CPUC in the General Proceeding. However, these issues are outside the scope of CEQA review for the proposed steam generator replacement project. Please also refer to Master Response MR-1 (Baseline).

The comment also believes that the analysis provides a blanket dismissal of alternative energy technologies. This comment is addressed in Response CC4-9, and an explanation of the level of analysis needed for the No Project Alternative is provided in Responses CC2-1 and CC2-2.

19-7 The seismic risk of the operating SONGS facility is an aspect of the environmental baseline, as described in Sections D.1.2.1 and D.1.2.5. Please also see Master Response MR-1 (Baseline). For project components that would be subject to potentially significant seismic hazards, the Draft EIR identifies mitigation measures that would preserve structural integrity and safety and reduce such impacts to a less than significant level. This is illustrated by Mitigation Measures G-5a (Prepare site-specific geotechnical investigation for OSG Storage Facility) and G-6a (Prepare an updated Safety Analysis Report to accommodate the OSG Storage Facility), which reduce the risks of the OSG Onsite Storage Alternative, including potential exposure to landslides, to less than significant levels. Please also see Responses CC5-33 and SCE-20 regarding potential landslides at coastal bluffs.

Comment Set 20
Wendy Morris

May 25,2005

CPUC
Comments on Draft EIR
Proposed San Onofre Nuclear Generating Station Steam Generator Replacment Project

My name is Wendy Morris and I am the CREED liasion to the Surfrider Foundations South Orange County Chapter.
I am against the replacement of the steam generators at Songs. The replacment would serve to extend the life of this facility. California should be replacing potentially extemely hazardous nuclear energy technology with clean, abundant renewable energy production.
I agree with San Diego Gas and Electric and other owners of SONGS that the $680 million price tag to extend the life of nuclear energy production at Songs is too expensive. The money would be much better spent on renewable energy production.
I ask that for the comparisons between the replacement/rebuild proposal and the alternative of the sustainable energy resources be drawn into the EIR. 20-1
A thorough comparision of the wide range of benefits of renewable energy production versus the dangers of the radioactive waste of nuclear energy production must be shown in the EIR to provide a viable document.
I also have other reasons for wanting an end to the nuclear facility at Songs. All of the following ides need to be adequately addressed and resolved in the EIR.
1.Currently there is no facility to accept the nuclear waste from SONGS. So the radioactive waste is stored on site. This storage is a prime target for terrorist.
2. The facility was not designed for the long term stoage of nuclear waste that is curently going on . Since the waste is not leaving, it should be considered long term storage.
3. In case of an accicdent, terrorist attack or other emergency the adjacent residents could not evacuate the area. The evacutaion plan is a joke.
4. The harm to the environment that is ongoing with the day to day operations of using 2.4 billion gallons of seawater per day needs to end sooner, not later. I object to the DEIR using the current environmental condition as a baseline to compare this project. That comparision is misleading. The comparision should be made to the environmental condition of the area previous to the building of the nuclear power plant. This is a shifting of the baseline. The continued damage to the environment has cumulative impacts. These impacts should be included in the 20-2

Comment Set 20, cont.
Wendy Morris

comparison with renewable energy alternatives.
5.There are now many warnings about eating fish in the higher levels of the food chain. Is this a result of the release of small amonts of toxic chemicals?I ask that the assessment of chemical/toxic waste streams in which zero tolerance chemicals are disposed into the ocean needs to be addressed. This dilution contends that large quantities of water can dilute lethal chemicals acceptable. This is a 'delusion of dilution'. The quantities of these chemicals are small, but still exist. As they enter and go up the food chain they concentrate. Thereby, their quantity in the food chain ever increases. This concentration of chemicals has resulted in the current warnings we have about eating many types of fish. **20-3**
6. The ability,hazards and cost to dispose of the nuclear waste should be included in this EIR. The true disposal costs need to be added in when comparing the cost of nucler energy production to renewable energy production. It doesn't matter whose jurisdiction it is, the disposal costs need to be included. They are part of the total costs of nuclear energy. **20-4**

Signed,

Wendy Morris

Wendy Morris
2310 Plaza A La Playa
San Clemente, CA 92672

Responses to Comment Set 20
Wendy Morris

20-1 It is noted that the commenter opposes the Proposed Project and supports the use of renewable energy sources as replacement power generation for SONGS. The comment notes that hazards of nuclear waste handling, storage, and disposal could be avoided under the No Project Alternative. These baseline risks are identified in Section D.12.1 of the Draft EIR, and the beneficial effects of the No Project Alternative on waste issues are described in Section D.12.5. Section C.6.3 of the Draft EIR describes various alternative energy technologies that are currently available as possible scenarios under the No Project Alternative. However, no available alternative technology can reliably replace 2,150 MW of base-load generation capacity in the intervening time period before SONGS would need to shut down. This comment also offers an opinion regarding the best use of the project's cost and requires no response.

Section E of the Draft EIR (Comparison of Alternatives) provides a detailed evaluation of the relative benefits and drawbacks of each evaluated alternative when compared to the environmental impacts of the Proposed Project. Section D.1.2.3 of the Draft EIR clearly indicates that local surroundings would experience beneficial impacts with the shutdown of SONGS; however, Executive Summary Section 4.3 notes that these effects would be substantially outweighed by long-term impacts related to construction of new power plants and transmission facilities at numerous locations outside of SONGS.

20-2 It is noted that the commenter opposes the use of current environmental conditions as the baseline. Please refer to Master Response MR-1 (Baseline) for a discussion of the Proposed Project's environmental baseline, which includes the use of seawater for the plant's cooling water systems through the current license terms. CEQA Guidelines Section 15125(a) states that the environmental setting, or baseline, of a project is ". . . the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced . . ." The notice of preparation was published in October 2004, and therefore includes an operating power plant and the existing NRC operating licenses that allow SONGS to operate until 2022. The use of seawater for the cooling water system is part of the ongoing operation of SONGS and therefore is part of the environmental baseline. In addition, as stated in Section D.1.2.1 of the Draft EIR, the baseline includes any potential environmental effects of operating SONGS through the end of the license terms. Therefore, any effects due to the use of seawater for the cooling system are also part of the environmental baseline, and were analyzed and approved through the end of the license terms by earlier environmental reviews. A cumulative scenario was described in Section F.3 of the Draft EIR, and the cumulative impacts are analyzed in Section F.4. The No Project Alternative only needs to be compared with the Proposed Project and other alternatives, not the cumulative plus project scenario, as suggested by commenter.

20-3 This comment presents information and asks questions regarding the release of toxic chemicals into the ocean and the subsequent bioconcentration within marine organisms. This comment does not require a response because the Proposed Project would not involve release of materials to the ocean. Please see Response CC6-5.

20-4 It is unclear specifically what nuclear waste the commenter is referring to in this comment. However, the production and disposal of spent fuel waste are included in the EIR as activities occurring in the environmental baseline (see Draft EIR Section D.1.2.1), and these activities would not be consequences of the Proposed Project. Disposal of the original steam generators, defined as Class A radioactive waste, is described in Section B.3.4.5, and the impacts of disposal activities are analyzed in all issue areas throughout Section D. No significant impacts would occur as a result of the proposed disposal activities.

CEQA does not address economic issues, such as cost, in the evaluation of the Proposed Project or alternatives. Project cost is addressed by the CPUC in the General Proceeding (A.04-02-026) on the Proposed Project.