

Diablo Canyon EIR Project

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Sent: Tuesday, May 03, 2005 3:24 PM
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Subject: FWD: Comments to DEIR

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Sent: Tuesday, May 03, 2005 11:54 AM
To: diablocanyon@aspenerg.com
Subject: Comments to DEIR

San Luis Obispo (SLO) GREEN Party Comments
(May 3, 2005)

to

California Public Utility Commission

to the DEIR

for the Diablo Canyon Nuclear Power Plant

Steam Generator Replacement Project

Proposed by PG&E Company

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

by

**Klaus Schumann, Chair of the SLO GREEN Party Subcommittee on
High Level Radioactive Waste at Diablo and**

**Member of the SLO Nuclear Waste Management Committee from
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SLO GREEN Party Comments (May 3, 2005)

We believe the DEIR is deficient beyond repair and needs to be re-written.

We strongly agree with the comments submitted by SLO Mothers for Peace (SLOMFP) and make their comments our own. In addition we offer the following specific comments and one additional GREEN Party concern:

Specific Comments

1. The Draft EIR is deficient because it ignores that Diablo's operating license will be in all likelihood extended for another 20 years.
2. The DEIR is deficient because it doesn't address at all future cost increases due to protection towards acts of malice. These costs are likely to occur because of the National Academy of Sciences Report on Nuclear Power Plant Security as mandated by US Congress.
3. The DEIR is deficient because it doesn't include future costs due to the aging of all components of the Diablo plant besides of the steam generators. It is a fact of life that all mechanical components of any industrial facility age and need replacement in time. This is even more true in an marine environment where salt water vapors are present to speed up corrosion.
4. The DEIR is deficient because it does not sufficiently deal with the numerous alternatives to nuclear power and their economic impacts.

Considering environmentally superior alternatives is at the heart of CEQA, yet this Draft EIR

fails to compare the environmental impacts of alternatives to Diablo's operation beyond 2014. Thus, this DEIR is legally inadequate because it does not comply with CEQA's requirement to provide a detailed analysis of possible alternatives.

5. The DEIR is deficient because its mitigation does not incorporate new earthquake data developed since

5/3/2005

publication of PG&E's Long Term Seismic Program in 1988. An update is essential for reviewing the seismic characteristics of the storage facility for the original steam generators. The entire facility was built with a slip-strike fault system near the plant in mind. Yet the Dec. 22, 2003 San Simeon earthquake was a thrust event! In addition, there are models which place thrust faults directly under the plant.

Additional GREEN Party Concern

Of special concern is the lack of detail regarding seismic safety along the path of the 360 ton steam generators within the Containment Structure and through the fuel handling structure

(Auxiliary Building). Both, the reactors and the waste pools, contain very large amounts of radioactivity.

It is unclear how these 360 ton loads will be restrained in the event of an earthquake. Since it will take many hours to move each generator, the time of exposure to earthquake risk will be significant. A drop or shift of these heavy loads might damage critical safety systems of the

reactor. Since the containment will be open during this process, a radiation leak would not be contained. The EIR should describe potential damage that might occur as the result of an accident and steps taken to reduce risk.

While the path through the fuel handling building appears to be far enough from the highly radioactive waste pools, the project description should provide detail on potential damage to safety measures to reduce risks, particularly seismic risks.

Generally, the text and diagrams must be more detailed as to the path of the steam generators and nearby hazards.

The section on the transport, preparation and storage of the OSGs must be more descriptive and should not just rely on NRC regulations. Straight forward descriptions of procedures would be helpful

Summary

As do all GREEN Parties on Earth, the SLO GREEN Party opposes nuclear power.

Besides of this fundamental concern, this particular DEIR contains many deficiencies and blatant omissions. The "Project Description" must include a detailed appraisal of the seismic risks, potential damage and safety concerns during the entire process of removal and installation of the generators, as well as, appropriate mitigation of risks.

Therefore, the SLO GREEN Party supports the comments by SLOMFP and joint parties in opposition to this Draft EIR. We concur that the Draft EIR does not comply with CEQA and does not provide an adequate basis for action by the CPUC on the Project application. The Draft EIR is fatally flawed and must be redrafted.