

Avila Valley Advisory Council

San Luis Obispo County, California

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May 3, 2005

Mr. Andrew Barnsdale, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104
diablocanyon@aspeneq.com

Dear Mr. Barnsdale:

SUBJECT: Draft EIR: Proposed Diablo Canyon Power Plant
Steam Generator Replacement Project
Prepared by: Aspen Environmental Group
for California Public Utilities Commission
SCH 2004101001, March 2005

Following are comments submitted to you for consideration and inclusion in the Final EIR for the Steam Generator Replacement Project at PG&E's Diablo Canyon Nuclear power plant in San Luis Obispo, CA.

Executive Summary

- ES.1 1.3 **Areas of Controversy/Public Scoping Issues**
Human Environment Issues and Concerns
AVAC Comment:
The scoping process for the EIR elicited strong concerns regarding potential impacts, mostly regarding security of the power plant, adequacy of emergency services, and public risk of onsite storage; other concerns were transportation and traffic issues. Evaluations of these potential impacts and recommended mitigations are inadequate. Implications of the DCP life extension was also scoped but ignored in the Draft EIR.
- ES.2 **Alternatives**
No Project Alternative
AVAC Comment: Without replacement of the Steam Generators, the Plant will likely close in 2013-2014. Longer term operation with license renewal should be addressed, to include the 9 years extended service with steam generator replacement.
- ES.3.1 **Environmental Assessment Methodology**
3.1.1 Environmental Baseline
In order for the Plant to operate until 2021/2025 respectively, the Steam Generators must be replaced. If they are not replaced, the Plant will shut down in 2013 and 2014, 8 and 11 years prior to the end of the current license. PG&E is in current processing for on-going operations of the plant.

AVAC comment: The \$700 million price tag for steam generator replacement will likely escalate with construction increases prior to the time of replacement in 2009. It is unlikely that the California Public Utilities Commission will approve these rate increases to customers with an assumption that the Plant will close in 2021/2025. This price tag would need to be absorbed over an extended license for the Plant to 2050.

Given the above assumption, this document falls short in its evaluation of impacts to Marine Biology and continuing Traffic and Circulation impacts for the minimum of an additional nine years that the Plant will operate with Steam Generator replacement. Additionally, the Draft EIR does not provide adequate analysis of the storage of the Old Steam Generators and the details and risks associated with this portion of the Proposal. Please include these impacts in this analysis.

ES3.13 Traffic and Circulation

3.13.1 Proposed Project

Original Steam Generator Removal, Transport, Storage

AVAC Comment: The number of project workers, 900 for this phase, should be included in this section.

C-9 Alternatives

C4.2 Replacement Steam Generator Offloading Alternative

AVAC Comment: Delivery of the steam generators directly to the Intake Cove at DCPD is the preferred alternative due to elimination of disruption to businesses and recreational access to Port San Luis that would occur with the proposed offloading at the Port. We support this alternative if it can be accomplished without incremental endangerment to personnel.

D.8-19 Land Use, Recreation, and Agriculture

D.8.2 Coastal Plan Policies

...."offloading at Port San Luis would not conflict with this policy because Port San Luis is not a public point of access acquired through historic use or legislative action."

AVAC Comment: Correct this data to reflect the Port's historic significance beginning with the tribal Indians and including explorer Cabrillo. In 1955 the State of California gave a grant of State Tide Lands to the Harbor District, a legislative action. Mitigation measures are mandated due to loss of access. Protection of existing access is not adequately addressed because of the inaccurate assumption that the Port neither qualified for protection of public access through historic use or legislative authorization.

D.8-20 Shoreline Access

AVAC Comment: Temporary impacts to Port San Luis or Avila Beach to shoreline access have not been addressed. Impacts to occur with road and parking closures need to be identified.

D8-22 Land Use, Recreation and Agriculture

AVAC Comment: Recreational users (coastal access, boaters, fishing, parking) displaced by the project's activities will require alternative means of accommodation. Adequate mitigation measures need to be developed for this impact.

Improvements to coastal access are required now because replacement of the Steam Generators will potentially extend the licenses to continue operating the Power Plant for a minimum of nine more years. The community will likely lose the opportunity to address the extension under the NRC review for renewal. This has not been addressed by the Draft EIR.

D11 Socioeconomics

This section addresses population growth and housing and labor demand. In each category, it is stated that "No impact would occur."

AVAC comment: 900 additional employees, added to an outage population employee increase of 1100, increases the employment population of DCPD from a "normal population" of 1400 permanent workers, to a total of 3400 employees, a 130% increase of "normal".

To assume there will be "no impacts" because area workers will be willing to make a two hour commute to the project area which has inadequate "affordable" housing supply is inconceivable. Although there will be no permanent change, the two year construction period will create impacts that need to be addressed. For out of the area workers, temporary housing demand needs to be mitigated, possibly by temporary housing supplied by PG&G.

D12.4

Environmental Impacts and Mitigation

Original Steam Generator Offsite Disposal Alternative

This section states that in 2008 only one site will receive OSG's.

AVAC Comment: The EIR needs to evaluate availability at this site for Diablo OSG's.

D.13.12

Traffic and Circulation T-1

D13.2.2 "Transport would temporarily increase local traffic."

AVAC comment: The offloading alternative to the Port is the Intake Cove at DCP. This alternative avoids blocking Port traffic and should be noted.

D13.13

D13.3.3 **Staging and Preparation T-3a**

Mitigation Measures

AVAC Comment: The trip reduction program proposed by the applicant needs to be required by the County before project approval. Mitigation components should not be deferred; mitigation that is not specified can not be evaluated for adequacy.

Offsite parking needs to be specifically identified and a shuttle service defined from both north and south US 101.

There needs to be a **mandated** requirement for OSG removal and SG replacement personnel (900) to reduce trips by 50%, plus the same requirement for outage personnel. It is unacceptable for greater traffic than that experienced during outages. This methodology will still allow for a significant increase in trips from 1400 regular personnel who are not mandated to participate in carpooling.

G-1 G.

NRC License Renewal

AVAC Comment: This chapter should identify what mitigation measures the NRC should implement based on environmental effects of increasing the power plant's longevity with replacement steam generators.

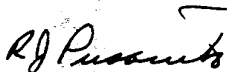
H-20

Mitigation Monitoring Program – Traffic & Circulation

T2-a AVAC Comment: Peak season has been defined as May to August. It actually extends through September and should be stated.

The Avila Valley Advisory Council appreciates the opportunity to provide these comments on the Draft EIR.

Sincerely,



Bob Pusanik
Chairperson
AVAC

C: Jerry Lenthall, 3rd District County Supervisor, SLO
AVAC Board