Alliance for Nuclear Responsibility
PO 1328
San Luis Obispo, Ca 93406-1328
(858) 337 2703

May 5, 2005

Comments of the Alliance for Nuclear Responsibility on the Draft Environmental Impact Report (DEIR) for the Proposed Diablo Canyon Nuclear Power Plant Steam Generator Replacement Project Pacific Gas & Electric Company's Application for Diablo Canyon Nuclear Power Plant Steam Generator Replacement project Application No. A.04-01-009

The California Public Utilities Commission (CPUC) announces the DEIR's greatest shortcoming when it fails to describe Diablo Canyon as a *nuclear* power plant in the title of this report. It is precisely that Diablo is a nuclear power plant that raises the greatest public concern. Due to the length of the words Diablo Canyon Nuclear Power Plant, the plant will henceforth be referred to as the Nuclear Plant. The Alliance for Nuclear Responsibility will focus on both the environmental impacts highlighted in the DEIR and the issues and impacts it failed to address.

It is very disheartening that the DEIR does not address the primary concern of the residents of San Luis Obispo County and other counties downwind. It is the additional decade of high-level radioactive waste that will be produced and must be stored on fragile earthquake active coastal bluffs if steam generators are replaced that is so crucial in this decision making process. Though not fully disclosed before this DEIR was issued, the following revelations have profound implications for the DEIR:

- Yucca Mountain documents were apparently falsified, leaving the fate of the nation's only proposed permanent radioactive waste facility in doubt;
- The National Academy of Sciences issued a report that questions safety of onsite spent fuel pools, and dry-cask storage;
- Utah officials are gathering support to prevent Skull Valley from opening.

The federal government faces the very dire consequences of being unable to develop a safe alternative to the temporary storage of highly radioactive waste. The question for California residents is whether our state can economically and environmentally afford to continue operation of nuclear plants when there is no permanent site for storage. This leaves the real possibility that highly radioactive waste will be temporarily stored forever. In the case of the Nuclear Plant, this storage will be sited very near to an active earthquake fault.

Planning to replace this radioactive generation must begin with weighing the true costs, both economic and environmental, of steam generator replacement. In our opinion the DEIR fails to take into account the true cost of the replacement. The state can save multi-billion dollar investments in steam generators and other failing components at

California's nuclear plants by looking at other less costly energy alternatives. We can use ratepayers' dollars to create electric generation that will benefit our state with new jobs, new property taxes, and clean energy while phasing out the production of high-level radioactive waste stored on our coast.

It is time for California to begin to plan for replacement of this aging and dangerous energy source. The opportunity to veer away from a nuclear path to renewable generation should begin with a denial of PG&E's Application for steam generator replacement at its Nuclear Plant.

ANALYSIS AND COMMENTS OF THE ALLIANCE FOR NUCLEAR RESPONSIBILITY OF THE D.E.I.R

The Alliance for Nuclear Responsibility has thoroughly reviewed the Draft Environmental Impact Report (DEIR). Even though comments result from a complete reading of each section of the DEIR, to the extent possible the Alliance has incorporated responses in points made in the Executive Summary with page citations footnoted.

* Under PG&E's stated objectives: "Replacement of DCNPP's aging steam generators may reduce risk of leakage..."[1]

COMMENT: What is meant by the term "aging" in reference to the steam generators? How long were steam generators anticipated to last if not for the entire original 40-year license for the Nuclear Plant? And if the steam generators are "aging" at the half-way point in the original licensed period, then what other components, allied or ancillary, might be aging and subject to "risk of leakage".

* The second objective of the Proposed Project is to operate the Nuclear Plant in a cost-efficient manner by reducing costs associated with tube degradation which is expected to increase over the next few years.[2]

COMMENT: What is truly meant by cost-efficiency given that the original reactors at the Nuclear Plant exceeded its budget by more than five-fold in terms of cost? Why is this "degradation" a problem now? Was it not foreseen in the original operating budget/plans for the plant, and if not, why? If this was not foreseen as an added cost, how can the public be assured that the project being addressed at present has taken into account such unseen and unplanned costs?

* Each DCNPP Unit provides approximately 1,100 MW of low-cost, zero-emission power to the California power supply.[3]

COMMENT: The use of the phrase "zero-emission" is misleading; there may be no direct emissions of greenhouse gasses into the atmosphere as a result of operating the

---

[1] DEIR, Executive Summary, ES-1
[2] ibid
[3] ibid

Nuclear Plant, however there are greenhouse emissions created in the nuclear fuel fabrication process. The emissions related to nuclear power are caused by the fossil fuel intensive processes involved in uranium mining, conversion, enrichment, transport and construction of power stations. As a result, nuclear power produces direct and indirect emission of 73 to 230 grams of CO2 per kWh electricity produced. Wind and solar, by comparison, are virtually greenhouse gas free, recouping construction emissions in the first years of operation.[4]

The definition of "emit" is: to give or send out matter or energy, *isotopes that emit radioactive particles...*[5] The Alliance does not believe the CPUC can responsibly attempt to ignore the "elephant" in the room: the tons of highly radioactive spent fuel that has been accumulated and will continue to be produced on the Nuclear Plant site if PG&E's application is approved. This waste which is vulnerable to accidents, seismic incidents and terrorism is indeed an "emission" albeit "solid" in nature.

* Based on the current progression of tube degradation, the likelihood of a forced outage to replace the steam generators is substantially increasing [6]

COMMENT: As recently as the June 2002 end of cycle meeting for the Nuclear Plant, the public was assured by Nuclear Plant personnel that the steam generators, while suffering degradation, would be able to be "plugged' and patched in accordance with NRC standards for the remaining life of the license.[7] If the situation went from "manageable" to "immediate" within two years, how can the public trust PG&E's engineering judgment in making "long term" plans for this facility?

* At this time PG&E has not formally proposed to renew the licenses, and license renewal is speculative and not a reasonably foreseeable outcome of the Proposed Project.[8]

COMMENT: PG&E currently acknowledges that it is performing "feasibility studies" for license renewals at the Nuclear Plant.[9] In addition, a representative of the Nuclear Regulatory Commission (NRC) stated at a public meeting in July 2003 that: "...All indications are that multiple license renewal applications will continue to be filed with the Commission over the next decade and eventually the entire fleet of nuclear plants will request license renewal."[10] Since that date the NRC has granted thirty license renewals. Therefore, it is highly erroneous to state that "license renewal is speculative and not a reasonably foreseeable outcome of the project."

It is important to highlight a clear contradiction in the DEIR re: foreseeability of license renewals vs. the foreseeability of a yet to be issued NPDES permit. The DEIR presents

---

[4] http://www.nirs.org/factsheets/climatenukes.pdf Nuclear Power: No solution to climate change
[5] The American Heritage Dictionary, page 603
[6] DEIR, Executive Summary, ES-1
[7] AGP Video DCISC meeting June 2003
[8] DEIR, Executive Summary, ES-2
[9] PG&E Overhead presented DCISC attachment to MFP and David Weisman Comments
[10] NRC Public Meeting transcript, July 15, 2003, Anaheim Hilton Hotel, page 12, lines 11-15.

the "Consent Judgment" on the continuing marine impacts of Nuclear Plant's cooling water entrainment and thermal discharge and their proposed mitigation as though this were a matter of settled fact.[11] There is, as yet, no Consent Judgment, and the issuance of an NPDES permit is therefore in doubt. If the DEIR wishes to cite PG&E's relicensing as "remote and speculative" because an actual request has not yet been filed, it must find the terms of the not-yet-entered Consent Judgment equally "remote and speculative," and cannot cite these terms as mitigation for the impacts of the plant's continued operation as facilitated by the Proposed Project. If CPUC considers the prospect of a consent judgment and NPDES permit likely, then the prospect of PG&E's request for relicensing is also likely. The DEIR cannot have it both ways.

* No Project Alternative.... The surroundings would experience beneficial environmental effects by shutting down the routine operation of DCNPP, most notably in the areas of marine biological resources and public safety.[12]

COMMENT: This statement by itself should be sufficient grounds for denial of the permit. By the CPUC's own conclusion in the DEIR, the environment and surroundings benefit from the shutting down of the Nuclear Plant. In fact, this refutes the contention that the Nuclear Plant has "zero emission" (see definition on previous page) because the thermal discharge of cooling water into the Pacific Ocean is an emission (liquid) and does have a deleterious effect on the marine biological resources. Marine degradation is an open issue and a state responsibility.

A DEIR that fails to include the California Thermal Plan and new EPA regulations for existing power facilities cannot be considered complete. In addition, the DEIR falsely claims the existing thermal plume, impingement and entrainment are part of the baseline conditions and would not change under the proposed project. In fact, the No Project Alternative would allow for the slow natural restoration of the marine environment.

Irreversible changes in the fish population would undoubtedly occur due to cumulative impacts. It is now well established that fish stocks in the ocean have been severely reduced. Several restrictions have been imposed on fishermen in order to protect the remaining fish population. Continued unrestricted entrainment of fish larvae by the Nuclear Plant over time would operate to reduce the remaining fish species, endangering the survival of enough fish to keep fish populations from collapsing.

New steam generators would extend the lifetime of the Nuclear Plant and although the baseline might not change, the damage to the environment would continue for an additional 10-35+ years. The DEIR as written lacks the commitment required by the CEQA process.

* At this time, it would be remote and speculative to predict exactly how replacement power would be provided given the wide range of possibilities, the types, sizes, number,

---

[11] D.3.1.5.1

[12] DEIR, Executive Summary, ES-2

or location of replacement power projects that might be constructed under the No Project Alternative. Because of these limitations, the environmental assessment for the No Project Alternative does not analyze specific replacement power scenarios. The analysis discusses potential replacement power solutions in a more general manner and at a lesser level of detail than the proposed project."

COMMENT: There is an apparent "disconnect" in the DEIR evaluation on PG. ES-2. At first the DEIR claims that: "The surroundings would experience beneficial environmental effects by shutting down the routine operation of DC[N]PP, most notably in the areas of marine biological resources and public safety," which would provide the maximum environmental benefit. However, at the conclusion of the paragraph the DEIR claims that "... At this time, it would be remote and speculative to predict exactly how replacement power would be provided; given the wide range of possibilities..."

The DEIR devotes a scant 6 pages[13] to examining the alternatives in a very cursory manner devoid of any specific examples or scenarios. In addition, the DEIR endnotes for chapter C.6 has 13 out of 18 citations coming from PG&E and 3 from the California Energy Commission (CEC) report, with no other independent sources listed, credited or consulted.[14]

The DEIR does not state emphatically that the No Project Alternative results are achieved by shutting down the plant. The DEIR then focuses any "alternatives" on small variances in the actual loading/unloading and transport of the steam generators, as if it were a *fait accompli.*

The repeated assertions in the DEIR that: "At this time, it would be remote and speculative..."[15] are disingenuous. Indeed it is the ideal time for the CPUC to begin to look at the replacement of nuclear power with its attendant drawbacks, particularly in light of the preceding statement: "The surroundings would experience beneficial environmental effects by shutting down the routine operation of DC[N]PP, most notably in the areas of marine biological resources and public safety."[16]

* Summary of Public Involvement: "Verbal comments were received at all three scoping meetings – two in San Francisco, twenty-three at the afternoon meeting in San Luis Obispo, and twenty-nine at the evening meeting in San Luis Obispo.[17]

COMMENT: "Verbal comments were received" but apparently the CPUC & DEIR consultants were listening or taking notes. In fact, there was no transcription of the meeting and it is obvious in the results of the DEIR. Luckily, the community has a videotape of the event, (sent by regular mail 5/2/05, as an attachment to this document). The CPUC should listen to the San Luis Obispo community requesting an in depth look

---

[13] DEIR, Section C-6, pages C 26 to C 35.
[14] DEIR, Section C-6, page 36
[15] DEIR, Executive Summary (PAGE)
[16] DEIR, Executive Summary (PAGE)
[17] DEIR, Executive Summary, ES-11

at alternative power scenarios to replace the Nuclear Plant.. Notes and website references were submitted at this meeting, including scenarios that involve repurposing the plant to natural gas as well as wind and renewable energy...none of these documents or sources are referenced in the end-notes or bibliography of the full draft DEIR [18] It is very disheartening for the residents of a community so impacted by the presence of a Nuclear Plant to have their comments ignored.

* Many comments from private citizens and non-profit organizations supported the No Project Alternative... General comments addressed the need to fully analyze all of the Proposed Project's alternatives.[19]

COMMENT: This is a stunning statement as it regards the impact these many comments had on the drafting of the DEIR. Out of a 500+ page report a mere six pages of content, using principally the applicant as the source of data, is all that is allocated to addressing the majority of the public's concerns for the No Project Alternative. It is as if the CPUC is completely ignoring the requests of those whose input it sought in the public participation process.

* These technologies do, however, cause environmental impacts, and they also have technical feasibility limitations. High costs and, in some cases, limited dispatchability, inhibit their market penetration. The ability of each of the seven alternative energy technologies to provide replacement power is summarized in Section C.6.3."[20]

COMMENT: The preferred place for Alternative Energy Technologies to be "summarized" is in the Executive Summary. The expected placement where these issues can be explored and analyzed is in section C.6.3, for which the public receives instead fewer pages of analysis than people at the public comment meeting presented as a bibliography to be studied. For a more detailed response to this omission, see comments for PG. ES-23.

* At this point, therefore, license renewal is remote and speculative and need not be considered in this document. License renewal is not a reasonably foreseeable consequence of the Proposed Project given the feasibility, analytical and regulatory hurdles to license renewal (let alone PG&E's decision on whether to apply for license renewal).[21]

COMMENT: PG&E currently acknowledges that it is performing "feasibility studies" for license renewals at the Nuclear Plant. In addition, a representative of the NRC stated on July 15, 2003, "All indications are that multiple license renewal applications will continue to be filed with the Commission over the next decade and eventually the entire fleet of nuclear plants will request license renewal." Therefore, it is erroneous to state

---

[18] AGP Video (APPENDIX and date)
[19] DEIR, Executive Summary, ES-13
[20] DEIR, Executive Summary, ES-19
[21] DEIR, Executive Summary, ES-22

that "license renewal is speculative and not a reasonably foreseeable outcome of the project.

As previously stated, the NRC has approved thirty license renewals without particularly high "hurdles" for nuclear utilities to jump.

Section 3.1.3 No Project Alternative

* The surroundings would experience beneficial environmental effects by shutting down the routine operation of DCPP, most notably in the areas of marine biological resources and public safety.

The justification for the "No Project Alternative" is seriously lacking throughout the DEIR. While the DEIR states: "The surroundings would experience beneficial environmental effects by shutting down the routine operation of DCPP, most notably in the areas of marine biological resources and public safety," it does not take that statement to the logical conclusion-the project should be denied.

The following comments highlight DEIR shortcomings:

COMMENT: Throughout the twelve pages of the section on Visual Resources- textual analysis, 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, a 10,000 square foot concrete structure proposed to be built without windows or any other architectural amenities.

As well, both concerning the OSG storage facility and the overall visual impact on the environment wrought by the replacement project, the analysis repeatedly begs the question. Here is one example: "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 it is implied that because the environment has already been compromised, 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 this section of the document, (D.14), a reference to the potential future viewer who might well happen upon this coastal setting after the eventual decommission of the DCPP. The analysis is written as if future tomorrows do not exist.

COMMENT: The DEIR lists 7 off-normal and 17 accident scenarios, declaring that none of them would "cause substantial public safety impacts". The justification for this breathtaking statement is that the ISFSI SAR found this to be true. This ISFSI SAR are highly contested and a recent report by the National Academy of Sciences clearly calls the vulnerability of the current spent fuel pool designs and onsite storage to the nation's attention.

The DEIR also refers to NRC Generic Letter 81-38 issued in 1981 stating that no low level wastes should be stored on-site for more than 5 years. However, since then "NRC has eliminated in its guidance any language that the 5-year term is a limit beyond which storage would not be allowed". The Low Level Radioactive Waste Baseline states that the used and contaminated steam generators will be stored onsite until and unless another *cost-effective* solution is found. In other words, no one knows what to do with same, but that should not interfere with the project. The DEIR moves all the way from a 5 year storage limit to a position that whatever is convenient for the plant operator is just fine! (D. 12-10 to 12)

COMMENT: On the whole the section on Traffic and Circulation is a well written and clear review of the roadway and NORMAL traffic impact in the area of the Nuclear plant. There is careful attention to spreading the impacts of additional personnel at the plant and mitigating the adverse effects associated with a greater number of trucks and cars during the steam generator replacement. Circulation conditions and roadway/intersection classifications are clearly explained, and the comparison between present traffic and seasonal conditions and those anticipated during and resulting from the steam generator replacement are lucid.

However, it appears to this observer that there is a fly in the ointment in that no attempt is made in this traffic and circulation element to anticipate and remedy any emergency/accident conditions that could arise during the steam generator replacement process.

This is probably also the case during non-replacement times. Under emergency, some panic conditions are bound to arise, as both residents in nearby areas especially (say within 2-3 miles of the Nuclear Plant) plus plant personnel themselves worry about families and children in and out of the immediate area. Where is the safety valve and what exactly is involved in giving timely warnings and plotting exits and traffic flow under emergency conditions?

Normal traffic flow, plus the additional traffic impacts associated with replacement activities, cannot reasonably be used as a baseline for projecting what will happen under extraordinary conditions. For example, as the Report states," The worst traffic in the area is experienced on Highway 101 in San Luis Obispo at the Madonna Road/227 junction and at the Marsh Street exit..." What will that mean under extraordinary conditions?

And as Table D.13-5 acknowledges, project activities under CEQA guidelines would be considered significant for traffic if "Project activities would restrict the movements of emergency vehicles (police cars, fire trucks, ambulances, and paramedic units) with no reasonable alternative access," thus yielding a grade of "F" (the lowest) for peak hour use. One can only imagine roadway traffic impacts under critical conditions that go beyond normal plant use and normal-smooth generator replacement.

Thus there is need for a new and major section of this Traffic and Circulation element to deal with all kinds of conditions during an emergency. Some of this will not be known

with certainty until after the fact. But some clear and imaginative thinking is needed in this strongly advised section that can present a reasonable and practical overview of traffic and circulation functioning under duress.[22]

COMMENT: The new steam generators will extend the useful life of Nuclear Plant Units 1 and 2 by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021 and 2025. This extension of the operation of the facility beyond the "natural" decommissioning point in 2013 creates an additional period of seismic risk experienced by the entire Nuclear Plant facility. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire Nuclear Plant facility 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.

As a mitigation measure to potential seismic ground shaking on the OSG storage facility, the DEIR proposes updating of the Long Term Seismic Program with new earthquake data (presumably including the San Simeon quake and related seismicity). The updated LTSP would then be used to develop a new design for the OSG storage facility. It is suggested, per the above, that this analysis be extended to the entire Nuclear Plant facility.

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. The landslide could be re-activated and damage the OSG storage facility. The OSG's are low-level radioactive, and the integrity of the storage area is thus critical to prevent contamination of the surroundings. As a mitigation measure, the DEIR 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, we may need to push PG&E to identify other potential sites.

* A range of replacement generation (including renewable energy sources and demand-side management) or conservation and transmission solutions are considered. The No Project Alternative is described fully in Section C.6 of the Draft EIR.

* This environmental assessment does not analyze any specific scenarios for providing replacement power-generating capacity or transmission system upgrades.... At this time, it would be remote and speculative to predict exactly how replacement power would be provided; given the wide range of possibilities, the types, sizes, number, or location of replacement power projects that might be constructed under the No Project Alternative. Because of these limitations, the environmental assessment for the No Project Alternative does not analyze specific replacement power scenarios. The analysis discusses potential

[22] Comments of Professor Ira Winn, PhD Urban Studies

replacement power solutions in a more general manner and at a lesser level of detail than the proposed project." [23]

COMMENT: The unwillingness of the CPUC to provide an in depth analysis of the No Project Alternative is incredibly shortsighted and irresponsible to California ratepayers. The CPUC cannot credibly issue a blanket dismissal of the role of alternative and renewable energy as being either expensive or technologically unfeasible. It is clear the CPUC has not cited nor researched any of the references provided by the public. If this had been done it should have been referenced in the endnotes for chapter C.6).

It should not be the public's job as citizens to do the work we are paying the CPUC's consultants to do. However this is our community at risk and in the spirit of streamlining the process, the public will provide the CPUC with the following links and resources

A. In Colorado, the town of Lamar has established a successful wind farm that is revitalizing its economy and adding needed megawatts to the system. http://www.coenergy.info/home.html)

B. In Texas, Public Citizen promoted a similar program that provided 1 Gigawatt of power (about ½ the output of Diablo Canyon) for a billion dollars in the late 1990s, for approximately the same cost as steam generator replacement: (http://www.ucsusa.org/clean_energy/renewable_energy/page.cfm?pageID=1644

C. California Governor Schwarzenegger has endorsed SB 1, legislation that would require solar powered homes providing 3.3 Gigawatts of power (one and a half times the output of Diablo Canyon!) by 2017...eight years *before Diablo Canyon's license to operate expires.* (http://environmentcalifornia.org/envirocalifenergy.asp?id=596&id4=ES)

* For the most part, market forces and private investment decisions would dictate how and where replacement power would be provided.[24]

Comment: These "market forces and private investment decisions" in the past decade have wreaked havoc with California's energy system and economy. Before the CPUC relies too heavily on market forces' input to plan for California's energy future, the Alliance for Nuclear Responsibility suggests consulting: http://www.consumerwatchdog.org/utilities/rp/rp002193.pdf for a full report on the effects of private markets and energy trading, "gaming" and transmission manipulation for speculation and profit; something that cannot happen under a "decentralized" power proposal such as the "million solar roofs" suggested by the above mentioned SB 1.

[23] DEIR, Executive Summary, ES-23
[24] ibid

Summary

There are two glaring errors presented in the DEIR. The first is to pointedly ignore the No Project Alternative as a viable option. It is clear by the comments contained in the document that no serious efforts were made to study this as a possible and reasonable choice. The citizens of San Luis Obispo County provided more information on this topic than did the consultants who authored the report. Secondly, the DEIR and the CPUC are attempting to ignore the real economic and environmental effects of a decision to approve this request. It cannot be reasonably stated that whether the utility will apply for further licenses is highly speculative. Numerous examples have been provided that suggested just the opposite; it is highly likely that if the CPUC gives the green light for this one billion dollar project than PG&E will continue to operate the plant for decades producing more and more tons of highly toxic radioactive waste with no storage strategy in place.

The whole purpose of analyzing cumulative impacts of the present project in context of other ongoing and planned projects is being ignored in this DEIR. The report should include an analysis of extending the life of the plant, seismic risks associated therewith, storage of nuclear waste, and alternatives to nuclear power. The DEIR avoids doing so on the ground that PG&E is not sure it is filing its renewal application. The utility admits the plant could be forced to shut down if the steam generators are not replaced. It has sought approval for enough dry cask storage space to continue operations well beyond expiration of the current licenses. Clearly the steam generator replacement is part of an overall plan to continue operations and seek license renewal. To exclude this analysis is to look at this in a piecemeal fashion that ignores the real environmental consequences.

The failure of the DEIR to flesh out reasonable and genuine alternatives, or to honestly account for foreseeable consequences of the proposed project, requires that, if this project is to be pursued at all, a new DEIR be issued, so that the Final product can incorporate public review and comment on genuinely substantive alternatives analysis rather than constitute a once-over response to a lack of such analysis.

Respectfully Submitted

Rochelle Becker, Alliance for Nuclear Responsibility
PO 1328
San Luis Obispo, Ca 93406-1328
www.a4nr.org
(858) 337 2703

ALLIANCE FOR NUCLEAR RESPONSIBIITY
PO Box 1328
San Luis Obispo, CA 93406

May 2, 2005

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

Dear Mr. Barnsdale:

Enclosed is Alliance For Nuclear Responsibility Exhibit 1 to accompany the comments of the Alliance filed in response to the draft E.I.R re: Diablo Canyon Power Plant Steam Generator Replacement Project Application No. A.04.01.009 SCH No. 2004101001

The exhibit consists of a video DVD of the E.I.R. scoping meeting held inSan Luis Obispo on October 27, 2004.

Thank you for your consideration.

Yours truly,

David Weisman
Board Member
Alliance for Nuclear Responsibility