

Diablo Canyon Steam Generator Replacement Project

From: tmurphy@aspenerg.com
Sent: Monday, November 08, 2004 2:27 PM
To: mtangard@aspenerg.com
Subject: Fwd: Comments to CPUC, EIR Diablo Canyon Steam Generators Replacement

San Luis Obispo (SLO) GREEN Party Comments
to
California Public Utility Commission
to the Notice of Preparation
EIR
for the Diablo Canyon Nuclear Power Plant
Steam Generator Replacement Project
Proposed by PG&E Company
Application No. 04-01-009

by

Jay Adams, Ph. D., Member of the SLO GREEN Party Steering Committee

and

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 1996 to 2002

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Attention:
Nicolas Procos/Tom Murphy
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: PG&E Diablo Canyon Nuclear Power Plant Steam Generator Replacement
Project Environmental Impact Report

SLO GREEN Party Comments (November 8th 2004)

Dear Mr. Procos and Mr. Murphy,

We refer to our oral comments at the scoping meeting on October 27th in San
Luis Obispo.

Generally, the SLO GREEN Party is in full agreement with the comments by
GRUENEICH RESOURCE ADVOCATES on behalf of SLO Mothers for Peace et. al. We
make their comments part of our own.

We especially concur with their comment that the project in question is not
simply a construction endeavor. All impacts due to the prolongation of the
plant life need to be included in the EIR:

The scope of the Environmental Impact Report for the steam generator
replacement project at Diablo Canyon Nuclear Power Plant must fully address
the following issues to assure protection of San Luis Obispo residents and
all PG&E ratepayers:

- new seismic information
- security enhancements that will be required to provide defense-in-depth at Diablo's expanding high-level radioactive waste facility
- impacts of a projected 39% of PG&E workforce becoming eligible for retirement during the planned project
- alternatives to replacement of steam generators
- likelihood of license renewal

The EIR must consider all environmental impacts which could occur from 2014-2025, or even until 2045 if Diablo gets re-licensed.

The SLO GREEN Party is foremost concerned about the impacts due to increased storage of high level radioactive wastes at the Diablo Canyon site as a direct result of the steam generator replacements.

Since many of the issues are identical to issues related to the PG&E application with SLO County for an Independent Spent Fuel Storage Installation, we refer to our comments made to the EIR for that project, i.e. pages 10-114 ff and in Appendix D of the FEIR. We also draw your attention to the conclusions by the County Consultant MRS in the FEIR in 6.0, the "Environmentally Superior Alternative".

Furthermore, we urge you to study the ramifications of a fire in the waste pools as outlined - very conservatively - by MRS on pages 10-165/166 of the FEIR.

In addition we offer the following general and specific comments:

A. General Comments

The GREEN Party is the largest political party on Earth. We are active in over 90 countries and on all five continents. Naturally, there is a wide diversity of opinion and expression. But when it comes to nuclear power, GREEN parties everywhere on Earth speak with one clear voice:

Phase out nuclear power NOW.

How much sense does it make to continue with a technology which benefits just one or two generations but then burdens the next 12,000 with safeguarding the extremely toxic radioactive wastes from damaging the environment !?! without taxpayer subsidies, bail-outs, "recovery of stranded costs" and similar schemes, nuclear power cannot compete with benign and sustainable energy sources. Why continue to expose the residents of our planet to the risk of nuclear catastrophe when other forms of energy production are readily available?

Furthermore, since 9/11, it has become clear that nuclear plants are also a threat to National Security as well as a threat to the safety and health of anyone living within 500 miles of any of the nations 65 plant sites.

The nuclear industry has never fulfilled its promise to deliver "power too cheap to meter" and has broken its promise that its deadly wastes would be no problem. Instead we are now told that 9 times more will be stored on our coast than when the plant was first licensed and built. Meanwhile, Residents of SLO County continue to pay 50% more for their electricity than the

national average. Worst of all, PG&E proposals on how to deal with the high level waste storage problems will leave the vulnerable "spent fuel" pools at full capacity and "high density" for as long as the plant operates. With relicensing, that would be for at least another half a century. These pools are located outside of the containment area and will contain 20 times as much Cesium 137 as was released in the Chernobyl accident. Remember, it was Cesium 137 which caused most of the off-site contamination at Chernobyl. Cesium 137 is a strong emitter of lethal gamma rays and has the consistency of talcum powder. It is therefore easily dispersed over a vast area. NRC and SLO County (MRS) studies show that a substantial amount of this isotope would be released into the environment in the event of a pool fire. As with reactor accidents, clean-up and health care costs would amount to hundreds of BILLIONS of dollars and evacuation .

Fortunately, all these risks are completely avoidable. Improved energy efficiency and conservation and a switch to renewable forms of energy, as advocated by the GREEN Party, would generate no lethal wastes at all and would eliminate the costly need for future parts replacement, such as the steam generators. It also would create far more jobs, a boom in the economy and a more diversified tax base in the county. The history with nuclear power plants, like any mechanical device, clearly shows that as the plants age they require increased maintenance and repairs. The replacement of the steam generators are likely just the tip of the iceberg indicating other repairs and replacements to come

In addition, at Diablo, there is the continuous damage to our marine environment.

B. Specific Comments to PG&E application:

The SLO GREEN Party agrees with SLO Mothers for Peace, the Santa Lucia Chapter of the Sierra Club, et al. We believe it is time to stop throwing good money after bad.

At the heart of this matter lies whether it is in the public interest to continue with socializing costs of operating Diablo Canyon while privatizing the profits. Of course, any economic impact is directly related to the environmental issues.

In the case before you, the applicant plans to make a series of major capital expenditures within roughly between 2006 and 2009:

Besides of the \$ 706,000,000.- for the replacement of the steam generators there are:

1. the ISFSI, by 2006, at an est. cost of \$335,000,000.-
2. potential expansion of storage capacity in the high level radioactive waste pools in 2006, if needed;
est. cost \$ 4,000,000.
3. the replacement of the turbine blades: est. cost \$ 100,000,000.-
4. storage and disposal of the replaced steam generators for an uncertain period of time.

In addition there are a host of potential future costs:

1. further security measures for reactors and on-site storage of high level

waste due to 9/11.

2. retro fitting for seismic dangers due to discovery of thrust faults. [Diablo is presently designed to withstand up to 7.5 Richter scale events from slip-strike faults. Yet the San Simeon quake was a thrust event; at the San Onofre Nuclear Generating Station thrust faults right under the plant were recently discovered. New discoveries and information is being generated with just about every major quake].

3. Uncertainties about Yucca Mountain, which may prolong storage of high level radioactive waste at Diablo and increase the amounts.

4. Costs of potential terrorist attack/sabotage.

5. Accidents or acts of malice resulting in large radiation releases with many billions of dollars costs for health care, permanent evacuation and clean-up.

Moreover:

A major release of radioactivity from either the reactors or the waste pools would render hundreds of square miles of the County and the coastline uninhabitable for hundreds of years.

When Diablo was first built and licensed no more than about 500 waste units of high level radioactive waste were to be stored on-site and for no longer than five years. Today, there are about 2,000 units (called "spent fuel assemblies") stored. PG&E is presently applying for a total of about 4,500 units, which could become as many as 6,500 if the plant is re-licensed.

There is no certainty for how long. The numerous projections by PG&E and the federal government have proven to be wrong time and again. The latest projection is for 2017 as the time for a begin of high level waste removal from Diablo, that is if Yucca Mountain becomes available. Yet Yucca Mtn. continues to be entangled in legal disputes and may never open.

The possibility of pool fires is only recognized by the NRC since October 2000. The fire possibility is due to the high density racking added in 1986 without further local or state government involvement. As a result, SLO County is now and in the foreseeable future threatened by four sources for nuclear catastrophe rather than the always known two from the two reactors. Under PG&E's plans, this situation will continue until the plant is decommissioned.

Probabilistic risk assessments are problematic because they don't calculate human error or acts of malice, the two most likely sources for catastrophe.

Terrorist/sabotage risks do not take into accounts future weapons in the wrong hands.

C. Conclusion

The EIR must consider all environmental impacts which could occur from 2014-2025, or even until 2045 if Diablo gets re-licensed. If a major release of radioactivity, for whatever reason, should occur at any of the nations nuclear power plants, the ramifications of the catastrophe would be so large that the public would demand closure of all at once. This would result in an immediate loss of 20% of the nations electricity supply. We, as a nation, need to guard against this vulnerability and need to begin a gradual phase-out of the plants at appropriate times. It appears apparent that this time for Diablo Canyon is now.

We'd like to conclude by quoting the internationally renowned nuclear scientist Arjun Makhijani, the founder and executive director of the Institute for Energy and Environmental Research (IEER). He stated in May '99:

" The time at which a nuclear power plant runs out of storage space for spent fuel is an appropriate time to consider alternatives to its continued operation, since building new storage requires significant new regulatory and economic decisions."

["Short- and Medium-Term Management of Highly Radioactive Wastes in the United States", in IEER: Energy & Security No. 9 / Science for Democratic Action V7N3, page 5].

At this present time, Diablo Canyon is not only in need of storage expansion but, as outlined under B, of a host of additional certain and potential capital investments. In the past, all of these costs were grossly underestimated by the applicant.

This larger picture must be considered in the EIR. A piecemeal approach is not in the interest of the public at large and certainly not in the interest of the ratepayers.

For the SLO GREEN Party

Klaus Schumann