

Scoping Comments CPUC - Proposed DCCP Steam Generator replacement Project

Joyce Palaia \ PO Box 2478, Avila Beach, CA 93424
805-595-7536/ dusteroo@aol.com

I must state that I am a member of the Avila Valley Advisory Board, but I am writing to you as a public citizen, not as an Advisory Board member. I mention my membership on AVAC, specifically the Diablo Canyon subcommittee, because I have been forced as a result of that membership to get up to speed on what is happening at the Diablo Canyon Nuclear Facility.

Our board was invited to tour the plant shortly after 9/11. It was closed to the general public by then, so we were privileged to be able to have that special tour. I remember registering my concern to the tour leaders, that I could understand the importance of generating power, but I simply could not understand how they could continue if they had not found a safe way to dispose of the nuclear waste. After all, it is not like yard waste that can be changed into garden rich compost. It is, instead, a potential danger for generations to come.

Since, then I have become obsessed with learning all I can about PG&E, the NRC, CQEA, DCISC, etc. I have learned dozens of acronyms, gone to dozen sof meetings, heard multiple opinions, and have not changed my mind. Nuclear waste is the problem. If a safe way could be found to dispose of nuclear waster, nuclear energy would be wonderful.

PG&E has done such a good public relations job that most people in San Luis Obispo believe they can't do without them. I have a feeling that if all the costs of keeping the plant open were made public, most of the population would come to the conclusion that it is not beneficial to keep it - especially if there were to be a major nuclear accident because of carelessness, terror or natural causes such as an earthquake. The Central Coast would never recover.

We need to remember that PG&E is a corporation beholden to its shareholders. They continue to get their dividends, and the CEOs continue to be paid handsomely, so of course they want the plant to remain open, especially if they can pass on all their expenses to the rate payers.

The Central Coast is a beautiful place. All my neighbors call it "paradise". How this extraordinary place of beauty could be allowed to become a nuclear waste dump is a mystery to me.

VM recd 11/1/04
Jeff Pinak (sp?)
San Luis Obispo County resident
481-0661

I think that Diablo Canyon Power Plant should not replace the nuclear steam generators there at all. I think that the nuclear power plant is unsafe and never should have been there in the first place, and that nuclear power is not the solution to our power needs. Never will be, never has been, never should have been, ever. There's lots of other ways to generate power for our lights and electricity needs. Please enter my vote as No, do not replace the steam generators of the present nuclear power plant. Thank you very much.

Nicolas Procas
California Public Utilities Commission
40 Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

November 1, 2004

Dear Sirs, Mesdames:

Unbelievable!

PGE is going to steam roll ahead till it kills every living thing in the state of California, and thereby the adjoining states.

I am not going to state all the reasons why I say this, because they are listed in attachment 1 (encl.).

How can you the PUC even consider letting money hungry PGE undertake such a disastrous project?

Why is nuclear power not being phased out? It was a bad idea to begin with, and instead of seeking alternative means of generating power... we are still being serviced by these antiquated steam generators.

What is wrong with solar power? Clean, efficient, pennies a day to run.

Are we all under PGE's thumb, including you the CPUC?

Nov 01 04 01:19p

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Yes, shut Diablo Power Plant down immediately, before more adverse effects are created on our environment. How can you even consider such a project?

Suggested alternative to PGE's proposed project ... SOLAR POWER.

Of course I am sure the cost to the consumer does not enter into the EIR picture, but as a consumer of octopus PGE I must protest to you and more increases!

We elect officials who appoint other officials to watch over our welfare. At least that is what was originally intended. Is this project a way of taking care of our welfare? By approving such a project you are slowly killing us. Must we wear gas masks and ear plugs and dark glasses to live?

Take care of us OFFICIALS. Do not let yet another PGE project poison our environment.

Sincerely,

Irene E. Mavridis
IRENE E. MAVRIDIS
8587 TRENTON RD.
FORESTVILLE, CA 95436

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NOTICE OF PREPARATION

PG&E DCPD STEAM GENERATOR REPLACEMENT PROJECT

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Attachment 1

Summary of Potential Issues or Impacts: PG&E DCPD Steam Generator Replacement Project

Environmental Issue Area	Potential Issues or Impacts
Aesthetics	<ul style="list-style-type: none"> • Short-term visibility of equipment at Port San Luis and along transport routes (e.g., Avila Beach Road). • Temporary light and glare would be present in the unloading area should the replacement steam generators be unloaded during nighttime hours. • Duration of visibility of temporary facilities, materials, equipment, and debris.
Agricultural Resources	<ul style="list-style-type: none"> • No issues identified.
Air Quality	<ul style="list-style-type: none"> • Transport of replacement steam generators and installation activities would require heavy-duty diesel and gasoline powered equipment, which would produce short-term air emissions (fugitive dust, vehicle and equipment exhaust). • Additional exhaust emissions from increased temporary worker commuting trips.
Biological Resources	<ul style="list-style-type: none"> • Project is located in a coastal setting with a wide range of biological diversity that could be impacted. • Activities at the unloading areas, the transport routes, and the work sites could impact rare, threatened, or endangered species in the project area. • Temporary impacts to fish, avian, benthic, and sea mammal species may occur, especially near the replacement steam generator unloading locations.
Cultural and Paleontological Resources	<ul style="list-style-type: none"> • Impacts to known and unrecorded prehistoric and historic resources during transport.
Geology and Soils	<ul style="list-style-type: none"> • Short-term geological stability along transport access road when traversing natural drainage crossings, steep slopes, or landslide areas. • Excavation and reinforcement potentially necessary for barge unloading areas and roadways. • Long-term exposure of the storage facility structure to seismic hazards from a large-magnitude earthquake in the region (e.g., San Simeon earthquake); fault rupture or strong ground shaking could damage the facilities.
Hazards and Hazardous Materials	<ul style="list-style-type: none"> • Small spills or inadvertent releases of hazardous materials during transport and replacement activities. • Staging activities could encounter contaminated soils, and workers and the public may be affected if improper handling or disposal of contaminated materials occurs during soil disturbance and release. • Safety risks to workers and the public if proper radiation protection practices are not implemented during handling and disposal of radioactive waste, including removal and storage of the original steam generators. • Design of the facility to safely protect the public and the environment from inadvertent or terrorist-induced release of radioactive material. • Handling, transport, and storage of the original steam generators need to comply with radioactive waste regulations.

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PG&E DCCPP STEAM GENERATOR REPLACEMENT PROJECT**

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Environmental Issue Area	Potential Issues or Impacts
<p>Hydrology and Water Quality</p>	<ul style="list-style-type: none"> • Risk of water contamination and sedimentation from barge docking, mooring, and unloading of the replacement steam generators. • Drainage crossings and roadway improvements may be needed to reinforce the transport route, which could increase uncontrolled runoff, destabilization of slopes, and erosion. • Handling, transport, and storage of the original steam generators would also increase the likelihood of radioactive waste coming in contact with groundwater or surface water.
<p>Land Use and Planning</p>	<ul style="list-style-type: none"> • The project unloading and transport would occur on land managed by the Port San Luis Harbor District and San Luis Obispo County. • Possible conflicts with land use plans, ordinances, standards, regulations, and policies. • Impacts to sensitive land uses near the unloading area, especially Port San Luis.
<p>Noise</p>	<ul style="list-style-type: none"> • Transport activities near the Port San Luis Harbor may cause noise disruptions at residences, commercial sites, and beaches. The impact to residences would be especially notable if transport work would occur at night to minimize disruption of traffic.
<p>Population and Housing</p>	<ul style="list-style-type: none"> • Project would involve a large force of temporary workers, which would require accommodations in surrounding communities. • Possible disruption of Port San Luis operations from temporary workers camping near the unloading location.
<p>Public Services and Utilities</p>	<ul style="list-style-type: none"> • Possible damage to existing underground or overhead utilities by transport of the replacement steam generators along transport routes. • Capacity of emergency services to respond to any demands that could result from accidents, including disruption of utilities, hazardous materials spills, or improper handling of radioactive waste.
<p>Socioeconomics and Environmental Justice</p>	<ul style="list-style-type: none"> • Potential of work-related impacts (housing and traffic) to disrupt businesses and activities near the unloading location at Port San Luis Harbor. • Potential for disproportionate exposure to potential risks related to nuclear waste handling, disposal, or storage, including risks of attracting terrorist activities, to communities in the disposal area or along the disposal route.
<p>Recreation</p>	<ul style="list-style-type: none"> • Potentially reduced quality of recreational experiences at fishing and boating facilities at the unloading site of Port San Luis Harbor. • Transport of replacement steam generators could disrupt access to harbor facilities and the shoreline. • Project-related traffic, housing for short-term work-force, and the effects of noise and dust may adversely affect the use and enjoyment of nearby recreation facilities.
<p>Transportation and Traffic</p>	<ul style="list-style-type: none"> • Temporary closure of the parking areas of Port San Luis. • Potential to cause closure of other thoroughfares, the loss of travel lanes, loss of parking, and impediments to emergency and public service vehicles. • Potential disruptions to recreational boat or ship traffic near the points of unloading the replacement steam generators. • Addition of traffic to local roadways due to increased number of temporary workers may impact already congested portions of Avila Beach Drive, State Highway 1, and U.S. Highway 101.
<p>Other Issues Not Considered Under CEQA</p>	<ul style="list-style-type: none"> • Cost of the project to the ratepayers. • Replacing the steam generators and upgrading the infrastructure could provide an incentive for extending the operable life of the nuclear facility beyond its current license.

Diablo Canyon Steam Generator Replacement Project

From: Gabor Bethlenfalvay [bethleng@charter.net]
Sent: Tuesday, November 02, 2004 5:37 PM
To: diablocanyon@aspenerg.com
Subject: scoping comments

Dear Nicolas Procos:

Thank you for the informative meeting on the new steam generators. These are the points you should consider:

1. The new information on the active faults under Diablo Canyon that were presented
2. The information presented by Mothers for Peace - I will not repeat them here

Based on these arguments alone, I am for closing Diablo altogether, rather than throwing good money after bad. If Diablo accounts for only 10 to 15% of California's electricity needs, other sources should be found to fill them. The cost of damage repair in case of catastrophe far exceeds any conceivable costs of the energy lost due to closing. Increase prices if that is the only way to encourage savings in usage, if that be the last resort.

Sincerely,
Gabor Bethlenfalvay
255 Hermosa Way
San Luis Obispo, CA 93405

Diablo Canyon Steam Generator Replacement Project

From: Marina Bethlenfalvai [bethlenm@charter.net]
Sent: Tuesday, November 02, 2004 5:12 PM
To: diablo canyon@aspeneg.com
Subject: Steam Generator Replacement Project

To Whom it May Concern:

After attending the Public Scoping Meeting of Nov. 27th, I would like to express my support for the concerns voiced by Mothers for Peace, the Sierra Club and other Citizen Organizations.

Recent developments, such as

- 1) the Dec. 22 earthquake of last year; which changed our understanding of the seismic hazards at the site;
 - 2) the potential terrorist threat to nuclear installations; and
 - 3) the increasingly doubtful possibility of storing the steadily accumulating nuclear waste anywhere other than at its present precarious site
- all make it even more urgent than before to decommission this plant and look for alternatives to its extended operation.

Please listen to the concerns of the people who live in the area of this facility and to those who offer suggestions for alternative sources for the power produced here.

Thank you for your consideration.
Marina Bethlenfalvai

255 Hermosa Way
San Luis Obispo, CA 93405
(805) 544-5017

November 4, 2004

California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Subject: Environmental Impact Report for the Diablo Canyon Power
Plant Steam Generator Replacement Project Proposed by
Pacific Gas & Electric Company.

PG&E plans to replace their aging nuclear power plant one component at a time and to store the original radioactive parts on site. They started this process with their proposal to replace the fuel rods and to store the highly radioactive used fuel above ground on a hillside. Now they propose to replace the eight steam generators and to store the original highly radioactive generators near the same site. This piecemeal process is intended to avoid the scrutiny that would be involved in an EIR that studied the impact on the environment that will occur by extending the life of this hazardous power plant and by constructing an above-ground nuclear waste storage facility at Diablo Canyon.

PG&E should not be permitted to bypass the EIR process by using this one-piece-at-a-time tactic. The issue that this EIR must study is the effect on the environment and on public health and safety of extending, for some undetermined length of time, the life of this hazardous power plant and of creating an above-ground nuclear waste storage facility. Included, should be the effect in case of the event that PG&E is not able, at some future time, to meet their obligation to clean up their radioactive mess.

A factor that should not be overlooked in this EIR is the inadequacy of the existing emergency alert system and the lack of a disaster evacuation plan that encompasses and protects all sectors of the public that are in the danger zone, i.e. people who have no transportation or who are in hospitals, care facilities, prisons etc. or who are hiking, camping, ranching, etc. The EIR should, specifically, address the existing danger that the Early Warning System sirens are not audible in many parts of the danger zone. Those areas where the sirens are not audible should be identified and plans should be produced detailing how people in those areas will be given a timely warning.

Sincerely,



Perry Martin
P.O. Box 75
Avila Beach, CA 93424

Diablo Canyon Steam Generator Replacement Project

From: Jill Z [jzk@charter.net]
Sent: Thursday, November 04, 2004 6:17 PM
To: diablocanyon@aspenerg.com
Subject: A comment from the public re: Diablo Canyon

To the CPUC:

I was unable to attend the October 27th meeting in San Luis Obispo, but I would like to comment on the issue. I am opposed to the replacement of the steam generators. Rather, I would like to see the nuclear plant closed and replaced with a more environmentally sound energy source. I have several concerns about the continued operation of Diablo Canyon:

1. Seismic

When Diablo Canyon was originally licensed, no seismic studies were performed. Two Shell Oil geologists subsequently released a study of an offshore fault capable of a 7.5 magnitude earthquake, and the plant was retrofitted. Considering the recent seismic activity in the area, more current geological data is needed.

2. Aging Parts and Personnel

Diablo Canyon is an aging nuclear plant with aging components and an aging workforce. 39% of its personnel are eligible for retirement in the next 5 years. This is the same time period when PG&E expects to build an expanded high-level radioactive waste facility as well as replacing 8 steam generators.

3. Security

In a post September 11 environment, not enough has been done to protect nuclear plants from acts of terrorism.

4. Marine Environment

PG&E has been out of compliance with both its NPDES permit and the California Water Code for many years. The marine environment is being significantly degraded by the plant's release of heated water and a myriad of chemicals.

Sincerely,

Jill ZamEk

1123 Flora Rd.

Arroyo Grande, CA 93420

11/4/04