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## CDF/San Luis Obispo County Fire Department

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635 N. Santa Rosa • San Luis Obispo • California 93405

May 4, 2005

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

Subject: Draft EIR - DCPD Steam Generator Replacement Project

Dear Mr. Barnsdale,

We have reviewed the Draft Environmental Impact Report on the Diablo Canyon Power Plant Steam Generator Replacement project. The CDF/San Luis Obispo County Fire Department advocates some changes be made to the EIR before the publication of the Final draft.

The executive Summary of the EIR accurately states on Page ES-1 under "PG&E stated objectives for the Proposed Project" that this project "ensures continued supply of low-cost power." "...to ensure that this supply of power remains available to California users until the end of the two current U.S. NRC licenses for Unit 1 and Unit 2 (2021 and 2025, respectively)." Further, on page ES-2 under "No Project Alternative" that if this project is not approved then the plant will shut down as a result of having to take the steam generators out of service in approximately in 2013 or 2014.

This shows there is a nexus between this project and the length of time the power plant will operate. Therefore we have listed mitigations not only specifically for the steam generator replacement portion of the project but also mitigations we require to adequately protect DCPD for a longer period than was first realized when the plant was originally permitted.

The OSG Facility project is a significant project that will require a large number of workers and major construction processes. With this type of construction project fire protection and rescue problems will occur that must be mitigated.

Many of the mitigations listed were also conditioned as part of the ISFSI project and are reiterated here, but are only required once for both projects.

**Mitigations for impacts:**

- a. A policy and procedure will be written and approved giving an exemption to the “No Flight Zone” over the DCNPP allowing over flights for Fire Protection, Medical and Law Enforcement Agencies’ Fixed and Rotary Wing Aircraft. This will include privately owned emergency contract aircraft assigned to the emergency. Especially during the events of a wildland fire, rescue or law enforcement activity. This procedure will be shared with Diablo Canyon Security Forces, California Highway Patrol, San Luis Obispo County Sheriffs Department, Medical Helicopter Companies, CDF, United States Forest Service, Coast Guard and other emergency responders. This condition will be met prior to the signing of the annual MOU between CDF and PG&E.
- b. A fire hydrant system will be installed at the OSG facility and the facilities in proximity. The fire hydrant system must meet the requirements of the California Fire Code as adopted by the County of San Luis Obispo. This system will be installed prior to the movement of the OSG to the OSG facility. The design of this system, and any other fire suppression system, shall be approved by CDF/San Luis Obispo County Fire Department. The systems shall be designed by a licensed Fire Protection Engineer qualified in the design of systems of this nature. The Fire Protection Engineer must be approved by the CDF/San Luis Obispo County Fire Chief. This condition must be met prior to construction of the project.
- c. PG&E will maintain the vegetation in the area identified in the PG&E Wildlands Fuel Management Plan dated February 1999 to a Fuel Model 1 or 5 (Anderson, 1982) with a live/dead fuel load of less than 3.5 tons per acre. The plan and implementation of the plan will be reviewed and approved by CDF/San Luis Obispo County Fire Department annually at the time of the signing of the annual MOU.
- d. Emergency Response and Planning.

Emergency fire and life safety response plans commensurate with those responsibilities and authority consistent with the risks of the power plant will be reviewed, approved and verified for efficacy annually prior to the signing of the annual MOU. These risks will include fire protection, radiological emergencies, rescues, hazardous materials and or medical emergencies. Technical assistance required by the agencies to review the plans will be funded by PG&E.

- i. PG&E will write a policy and procedure that will alert offsite responders to the radiation levels or to other hazardous plumes as they respond to or are at scene of an emergency at the DCPP. This condition will be met prior to occupancy of the project.
- ii. The fire life safety response plans for onsite and offsite responders will continue to be evaluated by a subject matter expert provided by PG&E who is approved by CDF/San Luis Obispo County Fire

Department when either the Fire Chief or PG&E determine a need because of a substantive change in policies, procedure or requirements. PG&E will provide this expert for no more than 80 hours each year. This condition will be met prior to the signing of the annual MOU.

- iii. A clearly established jurisdictional responsibility and authority matrix will be created that delineates the authority and boundary of that authority for NRC and local public protection agencies. The jurisdictional authority for fire protection related to the OSG Storage Facility, ISFSI, the power block, and the areas outside the power block must be clearly established for both fire prevention and fire protection. This condition will be met prior to occupancy of the OSG facility.
  - iv. Radio communication by offsite responders must be constant throughout the access routes into the plant and at the plant site. This communication must include contact with onsite personnel and offsite emergency dispatch centers, both law enforcement and fire. This condition will be met prior to occupancy of project.
  - v. PG&E will develop an emergency medical and rescue component for onsite at DCPD as part of the Emergency Plan. CDF/San Luis Obispo County Fire will review and approve emergency medical and rescue plans. This condition will be met prior to the signing of the annual MOU.
- e. PG&E will develop a policy and procedure for training requirements for its Industrial Fire Brigade.
- i. The required level of training for the Industrial Fire Brigade will be set at a minimum outlined in Table 1 or to a level approved by the County Fire Chief:

**Table 1.** Required Level of Training for the Diablo Power Plant Industrial Fire Brigade should meet any established regulations of the Nuclear Regulatory Commission and National Fire Protection Association, and should include:

Brigade Personnel	Minimum Training Requirements
Reserve Brigade Personnel	<ul style="list-style-type: none"> <li>1. Certified Volunteer Firefighter</li> <li>2. Basic First Aid and CPR</li> <li>3. First Responder Hazardous Materials</li> <li>4. Radio Communications Training</li> <li>5. Radiological Emergency Training commensurate with NRC requirements and potential risks associated with this power plant.</li> </ul>
Entry Level Brigade Personnel	<ul style="list-style-type: none"> <li>1. State Certified Firefighter 1</li> <li>2. Emergency Medical Technician 1D</li> <li>3. Hazardous Material Specialist</li> </ul>

	<ol style="list-style-type: none"> <li>4. Confined Space Rescue Operations</li> <li>5. Incident Command System 200</li> <li>6. Basic Wildland Firefighter</li> <li>7. Rescue Systems 1</li> <li>8. Flammable Liquids Fire Protection (Fire Control IV)</li> <li>9. Structural Firefighting (Fire Control III)</li> <li>10. Radio Communications Training</li> <li>11. Radiological Emergency Training commensurate with NRC requirements and potential risks associated with this power plant.</li> </ol>
Brigade Pump Operator	<ol style="list-style-type: none"> <li>1. Above requirements plus;</li> <li>2. State Certified Driver/Operator (Driver/Operator 1A &amp; 1B)</li> </ol>
Brigade Company Officer	<ol style="list-style-type: none"> <li>1. Above requirements plus;</li> <li>2. State Certified Firefighter II</li> <li>3. State Certified Fire Officer <ol style="list-style-type: none"> <li>a. Command 1 A &amp; 1 B</li> <li>b. Instructor 1A &amp;1B</li> <li>c. Prevention 1A &amp;1B</li> <li>d. Investigation 1A</li> <li>e. Management 1A</li> </ol> </li> <li>4. Incident Commander Type 3</li> <li>5. Incident Command System 300</li> <li>6. High Angle Cliff Rescue Training</li> <li>7. State Fire Marshal Command 2A</li> <li>8. Hazardous Materials Incident Commander</li> <li>9. ICS Safety Officer</li> <li>10. Hazardous Materials Safety Officer</li> </ol>
Brigade Chief Officer	<ol style="list-style-type: none"> <li>1. Above requirements plus;</li> <li>2. State Certified Chief Officer <ol style="list-style-type: none"> <li>a. Management 2A , 2B, 2C, 2D, 2E</li> <li>b. Command 2A, 2B, 2C, 2D, 2E</li> </ol> </li> <li>3. Incident Command System 400</li> <li>4. Incident Command System- Operations Chief</li> <li>5. Incident Command System- Incident Commander</li> </ol>

- ii. Proficiency exercises for the Industrial Fire Brigade will include the following and be reviewed by CDF/San Luis Obispo County Fire Department prior to signing of the annual MOU:
  1. Demonstrate annually that the firefighters can perform single engine company evolutions that include, interior fire attack, high-rise initial fire attack, hazardous material spill, confine space rescue, wildland fire initial attack, vehicle accident extrication, emergency medical response, ladder evolutions,

and high angle rescue operations. This will be recorded in training task books for all brigade employees and signed by a certified instructor for the subject.

2. Through drills, demonstrate annually the ability to coordinate an offsite fire response for a major emergency that would augment the Industrial Fire Brigade, including the effective use of the Incident Command System (ICS) and strategic and tactical evolutions. This drill will be consistent with the emergency response plan and include initial and secondary onsite and offsite responders as identified in the plan. This may be done through both table top and field exercises. The cost for overtime incurred by offsite agencies and extraordinary expenditures will be borne by PG&E.
  3. Define the NRC requirements and industry standards for an Industrial Fire Brigade assigned to a Nuclear Power Generating Facility. The above exercises must fully meet or exceed these standards.
- iii. PG&E will provide annual training to fire agency responders, CDF and other agencies, who respond to an initial and secondary response plan to DCPD as identified in the Emergency Plan. This training will be on aspects of the Emergency Plan and be conducted by a PG&E identified subject expert approved by the Fire Chief. The cost for preparation and delivery for this annual training will be borne by PG&E.
  - iv. The fire brigade will conduct and document a minimum of one drill in the protected area a month for all fire personnel.
  - v. Training films or other similar media will be produced by PG&E with coordination from the County OES on the subject of both onsite and offsite response to a radiological emergency and to an onsite emergency of any type consistent with the Emergency Plan. The films will be produced, or the funds encumbered and a bond issued, prior to the issuance of a clearance letter for the Old Steam Generator Storage Project or the ISFSI project whichever is completed first. The films will be approved by the Fire Chief.
- f. With the construction of the new fire station at DCPD, the PG&E Industrial Fire Brigade will meet the requirements of the National Fire Protection Association (NFPA) 1710 response time criteria that the first engine arrive at scene time within 4 minutes 90% of the time and that there be a sufficient number of trained personnel to initiate an interior fire attack consistent with NFPA, OSHA (2 in 2 out) and NRC guidelines.

PG&E has in place several mitigation measures that improve fire protection and help mitigate the long response times for the full alarm. These include, sprinklered buildings, a 5 person staffed fire engine, a fire protection maintenance program and class 2 standpipes (hose reel stations). However, in

order to mitigate the requirement that the initial full alarm must arrive within 8 minutes 90% of the time for a fire in a large building on the plant site PG&E will meet **one** of the following requirements to satisfy the **intent** of NFPA 1710 and OSHA requirements (2 in 2 out from 2 separate locations):

- Adequately staff and train the PG&E Reserve Industrial Fire Brigade so that a minimum of 9 personnel (professional and reserve) are able to respond to an emergency at the plant within 8 minutes.

Or

- Provide a total of 9 on duty PG&E professional Industrial Fire Brigade personnel who are fully trained.

Or

- Provide funding to CDF/San Luis Obispo County Fire Department to augment by 2 additional on duty personnel at the Avila Valley Fire Station 62.

- g. A building evacuation plan will be developed that is exercised annually for each building with an occupancy over 49 people. A log will be kept onsite documenting the evacuation drills for review by CDF. This condition will be met prior to the signing of the annual MOU.
- h. The Industrial Fire Brigade will have a fire engine in full working condition at the DCPP at all times that meets NFPA requirements commensurate with the risks associated with this plant. This equipment needs to be in top working order with provisions for systematic replacement and access to reserve equipment while down for maintenance. A policy and procedure will be developed with a replacement plan for the fire engine that will not exceed 20 years. If the current engine is over 20 years old it will be replaced prior to occupancy of this project. This condition will be met prior to the signing of the annual MOU.
- i. The fire hose and all other equipment on the fire engine must be in full working condition according to NFPA standards. The current fire hose is reported by a third party review to be in poor condition and must be replaced prior to occupancy of the OSG facility. A full complement of hose is required along with a back-up supply.
- j. If it is determined through the review of the emergency plans that a deficiency exists in specialized equipment requirements, PG&E will provide that specialized equipment either for their Industrial Fire Brigade or for offsite emergency responders. This includes fire protection, radiological emergencies, rescues, hazardous materials and or medical emergencies. This condition will be met prior to the signing of the annual MOU.
- k. PG&E will provide current industry standard personal radiation monitoring devices for off site responders prior to occupancy of project.
- l. When required CDF/San Luis Obispo County Fire Department will be included in the planning and implementation of the Public Education Program either directly or

through the County Office of Emergency Services. This condition will be met prior to the signing of the annual MOU.

- m. Access and egress to DCPD will be by two access roads that are not blocked other than by a security gate that is accessible to CDF/San Luis Obispo County Fire Department. The roads will meet the minimum CDF/San Luis Obispo County Fire Department standards for two way roads. When the primary access road is blocked during construction or during the transportation of the OSG, then the secondary access road must be clear of all obstructions. Provisions for access and egress must be maintained at all times or a citation could be issued.
- n. Provide reimbursement fees to CDF/San Luis Obispo County Fire Department for a qualified fire inspector to conduct an annual fire inspection of the Diablo Canyon Power Plant Facility including power block, and support facilities consistent with authority and jurisdiction. The rate will be according to the fee schedule adopted by the San Luis Obispo County Board of Supervisors (currently \$62.00 per hour) not to exceed 40 hours per year. This condition will be met prior to the signing of the annual MOU.

If I can provide additional information or assistance on this mater please call me at (805)543-4244.

Sincerely,

Dan Turner, Fire Chief

By:



Robert Lewin, Fire Marshal  
Battalion Chief

Cc: Jude Fledderman, PG&E  
Greg Pisano, Division Chief  
Ben Parker, Division Chief  
Mike Harkness, Battalion Chief