

Comments to California PUC
10-27-04

The Environmental Impact Report (EIR) for Steam Generator replacement at the Diablo Canyon Nuclear Power Plant must address the long term economic impacts on California ratepayers. A decision to allow the cost of replacement (\$706,000,000) to be passed on to the ratepayers is of such magnitude that it will require relicensing of the plant to insure payback. This will, in turn, mean many more hundreds of millions in repair and maintenance costs. A few of the "known" costs are:

- Dry cask storage - \$325, 000,000
- Turbine blade replacement - \$ 100,000,000 +
- Reactor head replacement- tens of millions
- Pumps, valves, etc- tens of millions

From these estimates, we can expect costs well in excess of one billion dollars. Further, we know, from past experience, that cost of construction and repairs have been grossly underestimated.

Beyond these costs, there will be the costs of revenue loss for downtime during repairs and maintenance, additional security, unknown safety upgrades, as well as, unforeseen repairs.

The Diablo Canyon is an aging nuclear power plant subject to salt water corrosion, seismic shock, accidents and acts of terror. Huge amounts of radioactive material could be released due to accident or acts of malice resulting in ten of billions in damage. Also, it must be recognized that if another nuclear power plant in the US is successfully attacked by terrorists, it is very likely the public will demand that Diablo Canyon be shut down.

The EIR must consider all these factors and serious consideration must be given to alternative investments in energy conservation and alternative energy sources.

Franklin Frank
3615 Ardilla Rd.
Atascadero, CA 93422

SPERMA # 20
7:00 pm meeting

New seismic information discovered and reviewed since 1991 raises both potential environmental impacts as well as, potential future costs for the Diablo Canyon Nuclear Power Plant. Seismology is an evolving science that has evolved significantly since the design and installation of DCNPP's existing seismic mitigation measures. The seismic expert hired by the San Luis Obispo Mothers for Peace, Dr. Jay Namson believes, "...DCNPP's underlying seismology is significantly different than was assumed by PG&E when it designed and installed the plant's seismic mitigation measures and that as a consequence public health and safety risks may well be significantly greater than previously assumed. Installation of additional seismic mitigation measures, at a significant cost, may therefore be required in order to achieve the degree of seismic protection that was thought to have been achieved by the seismic mitigation measures that are presently in place at DCNPP."

Although Dr. Namson's testimony demonstrated that there is existing scientific evidence and that additional seismic measures may be required, it was not allowed in the record of this case. History has demonstrated that ignoring seismic information has been extremely costly for PG&E ratepayers and it is irresponsible to ignore this information.

On behalf of the Local Community I ask that the CEQA process includes this important information in its review.

Jean Carter
935 Pacific
Morro Bay Ca

Carrie Filler
1079 Balboa St.
Morro Bay, Ca 93442
805 772 8465
October 27, 2004

Residents of San Luis Obispo County appreciate this opportunity to address the true costs of continued operation of the Diablo Canyon Nuclear Plant. PG&E has requested \$706 million to replace its steam generators and has stated that if the generators are not replaced Diablo must shutdown by 2014. Would phasing out the Diablo Canyon Nuclear Plant actually be a benefit for our county for all ratepayers? The answer is yes, both it would provide both environmental and economic benefits.

This community remembers the original estimate for construction of Diablo was under \$600 million, and the final cost passed on to ratepayers was \$5.7 billion. Clearly consumers should be skeptical of cost overruns involving *any* PG&E projects at Diablo, but we must also remember the inadequate oversight of the NRC regarding environmental concerns.

During licensing our county and state were under a very serious misconception that the high-level radioactive waste produced daily at Diablo Canyon would be removed from the vulnerable spent fuel pools and would not be stored on our fragile earthquake active coastal zone. Now the pools have been reracked, this lethal waste is packed more closely together in a building without containment, and the NRC has licensed an onsite expanded nuclear waste storage facility. The environmental costs of this misconception are still unknown and must be included in the CPUC's EIR for this project.

PG&E is now requesting ratepayers pay the full costs to replace its steam generators at Diablo, but the *real* costs of replacement far exceed its \$706 million estimate. If steam generators are replaced, then the reactor vessel head must be replaced. Additionally, each year the nuclear industry experiences new age-related problems which require millions of dollars to address. It's time to stop poring consumers dollars down the nuclear money pit.

Our rates would be better used to: phase out production of high-level radioactive waste on California's fragile coast; provide for a state-of-the-art "clean" electric generation facility; increase union jobs in our county; increase security; and increase property taxes.

This opportunity will not present itself again and as PG&E ratepayers we must speak out for greater control over energy decisions; decisions that will impact our health, safety, environment and economic future. Diablo is not just an electric generation facility; it is a nuclear waste dump in earthquake active coastal zone.

In the long run phasing out the Diablo Canyon nuclear plant may be the best investment California has ever made to protect its citizens and their livelihoods. The daily production of nuclear waste on our fragile coast must be phased out.

10/27: DCP Scoping Mtg (7-9pm)
Speaker # 2

Michele Flom
261 Hermosa Way
San Luis Obispo, CA 93405
(805) 788-0837

First of all, I'd like to thank the members of this committee for granting the San Luis Obispo community an opportunity to share our concerns.

And as to my concerns: The investment of another 700 million dollars of ratepayers money into Diablo Canyon Nuclear Power Plant. If the replacement of these eight steam generators were a local referendum, this ratepayer would vote no. And I know, based on numerous conversations, that I am speaking for many other resident ratepayers who are not present tonight.

I applaud this commission for your decision to prepare an Environmental Impact Report. I assume this report will take into account the ramifications of a possible terrorist attack, or an accident resulting from a major earthquake, as well as the maintenance required for long-term containment of the nuclear waste generated on the site.

And I would ask that when you are considering the possible environmental and economic effects on the local community that you keep in mind the Price Anderson Act, renewed Nov. 27, 2001. The Price Anderson Act "limits the liability of nuclear power plant operators to a tiny fraction of the potential costs of an accident—terrorist sponsored or otherwise. (This) act (also) prevents insurance companies from suing the nuclear power industry to recover damages—which is why insurance companies can't afford to include nuclear accidents in homeowner's coverage." *

The renewal of this act admits that the nuclear industry would be unable to "survive in a free-market system."* And what this bill means for local homeowners, in the event of any Diablo mishap, is that we're up a creek without a paddle.

I applaud this commission for investigating the replacement of Diablo nuclear plant with some other source or sources of electrical power on the existing site. I strongly urge you to assist PG&E in moving forward into a future that is both more economically viable and safer.

* Matt Bivens, "Who Pays for Nuclear Power?" The Nation, (posted online Nov. 30, 2001).

Diablo Canyon Steam Generator Replacement Project

From: Gregory C. O'Kelly [gokelly@charter.net]
Sent: Thursday, October 28, 2004 2:17 PM
To: diablocanyon@aspenerg.com
Subject: Public Scoping Meeting Written Comment

I attended the Public Scoping Meeting for Steam Generator Replacement held at the San Luis Obispo library on 10-27-04, the afternoon session.

Listening to the speakers and reading the Notice of Preparation of the EIR, and the attachments, I have come to the conclusion that no EIR would be complete without a discussion of the impact on the area of continued operation of the power plant and the tremendous increase, on the order of over 1000 tons, of radioactive waste to be stored on site.

This waste would come from the old generators alone, and would not even include spent fuel rods.

In addition there is the issue of who will pay for this generator replacement. If the ratepayers are saddled with the expense, most of whom are opposed to nuclear power to begin with, this would be the height of social injustice. If instead the PG&E investors were to pick up the cost, they would assuredly be more amenable to less expensive and less environmentally harmful means of power generation, and they would focus instead on available technologies that could do this without causing toxic waste that lasts for thousands of years.

Gregory C. O'Kelly
392 Pismo St.
SLO, CA
93401

VM recd 10/28/04
Maureen Kelly

Resident of the county, lived in San Luis Obispo for about 25 years, now living in Nipomo. I've been here 30 years, and I am very opposed to PG&E being able to replace the steam generators and continue to function as a nuclear power plant because of the expense. I think it is much wiser to close the plant down and convert to some safer power, which in the end will be better for all of us. They will both cost money, but I think environmentally, changing from a nuclear power plant to some other more safer source is in everyone's interest.