

831 North Sixth Street
Grover Beach
CA
93433
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Carmela Vignocchi
carmelav@gotdebt.org

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

2259 Florence Ave
San Luis Obispo
CA
93401
United States

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

It's time to stop throwing good money after bad. The Nuclear Era is ending, and enlightened California can lead the US to sane solutions.

Sincerely,

Russ Ferriday
russf@topia.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

291 Lincoln St
San Luis Obispo
CA
93405
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Vivian Longacre
vlongacr@calpoly.edu

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

2727 Market St.
San Diego
Ca.
92102
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Tim Casebolt
adog2@earthlink.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

3 Winterbranch
Irvine
CA
92604
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Elaine Booth
esbooth1@cox.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

9582 Hamilton Ave. #100
Huntington Beach
CA
92646
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Stephen Pew
upgeya@prodigy.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1123 Flora Rd
Arroyo Grande
CA
93420
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Jill ZamEk
jzk@charter.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

217 Westmont Ave
San Luis Obispo
CA
93405
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Linda Seeley
lindaseeley@charter.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

2003 Bayview Heights Dr.
San Diego
CA
92105-5526
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Mary Boersma
peonybushgarden@yahoo.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

4466 Ohio St. Apt. 4
San Diego
CA
92116
United States

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Norma Villegas
tianormalita@yahoo.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

6445 Corral de Piedra
San Luis Obispo
CA
93401
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

kathy teufel
kteufel@slocoe.org

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

5324 Felice Place
Woodland Hills
CA
91364
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Gail Kearns
gail.walter@adelphia.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

6683 Maury Dr.
San Diego
CA
92119-
United States

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Janet Dixon
spierdixon@mac.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

P.O. Box 1026
Grover Beach
CA
93483
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Lorraine Kitman
l.kitman@bejoseeds.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

6290 Hawk Ridge Place
San Miguel
CA
93451
United States

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

It is time for California to move forward into the 21st Century with energy technologies that produce truly clean, efficient energy. Not one more drop of radioactive waste should be produced in the State of California!!

Sincerely,

Molly Johnson
mollypj@yahoo.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

392 Pismo St.
San Luis Obispo
CA
93401
U.S.A.

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Gregory O'Kelly
gokelly@charter.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

4430 arch street
san diego
california
92116
usa

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

julia dashe
jdashe@mac.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

2065 McCollum St
San Luis Obispo
California
93405
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Evy Justesen
evyjust@slonet.org

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

261 Hermosa Way
San Luis Obispo
CA
93405
U.S.A.

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

michele flom
mflom@calpoly.edu

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

2580 Juniper Ave.
Morro Bay
Ca.
93442
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

David Nelson
moniqueanddavid@sbcglobal.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

16550 Oaracle Oak Way
Santa Margarita
California
93453
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Ken Haggard
pcooper@calpoly.edu

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1141 Carrotwood Glen
Escondido
CA
92026
US

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Also, Emergency Evacuation Plans for San Onofre are an absolute impossibility in both Orange County and San Diego County.

Sincerely,

Patricia Borchmann
pborchmann@yahoo.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

338 Henrietta St.
Los Osos
CA
93402
US

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Kristina Bennett
kristinabridget@hotmail.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

8600 santa lucia rd
atascadero
ca.
93422
usa

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

mark phillips
mrppy@fix.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

PO Box 185
Cambria
CA
93428
USA

Wed, 25 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Sandi Brockway
brockway@macronet.org

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1000 Montecito Rd
Cayucos
CA
934301528
USA

Thu, 26 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Henriette Groot
hplgroot@kcbx.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

507 Launa Ln
Arroyo Grande
CA
93420
USA

Thu, 26 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Constance Dunbar, MPH, RD
Condunbar@aol.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1304 Mariposa, #211
Austin
Texas
78704
USA

Thu, 26 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

The reconstruction and repair of the San Onofre plant will form a precedent for how aging plants across the nation are handled. It is critical that the work be carefully considered, and rejected if it cannot be completed safely.

Sincerely,

David Todd
davidweisman@charter.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1152 Vard Loomis Lane
Arroyo grande
California
93420
USA

Thu, 26 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Betty Smay.
Beemay@best1.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

26 Hillcrest Drive
Paso Robles
California
93446
USA

Fri, 27 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Klaus Schumann
jayklaus@msn.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1079 Balboa St.
Morro Bay
Ca
93442
USA

Fri, 27 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Richard Keller
rlkeller@calpoly.edu

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

P.O. Box 2175
Avila Beach
ca
93424
USA

Sat, 28 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Mrs. Barbara Caton
caton@slonet.org

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

14373 Gerona Court
San Diego
CA
92129-1728
USA

Sun, 29 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Kathleen L. Sanders
katsan@ixpres.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

23060 Lawson Ave.
Strathmore
CA
93267-9604
US

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Carolyn Waller
caroline@thegrid.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

619A Crocker St.
Templeton
CA
93465
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Nancy Shaw
nkshaw@aol.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

3351 Whidbey Way
morro bay
California
93442
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Please let California be the avant garde in promoting alternative resources for energy instead of just sticking our head in the sand and continue with an energy source that could be deadly to our citizens, flora and fauna.

Sincerely,

paula daillak
pdaillak@hotmail.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1998 Broadway #1204
San Francisco
CA
94109-2206
United States

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Ron Rattner
ronrattner@earthlink.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

P.O.Box 665
Morro Bay
California
93443-0665
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Nancy H. Ferraro
nancyhf@slonet.org

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

237 Sherman Canal
Venice
CA
90291
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Alice Stek, MD
stek@usc.edu

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

19181 Jovan
Tarzana
Ca
91335
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Mary Beaumont
rochelle@a4nr.org

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

354 Corbett Canyon Road
Arroyo Grande
CA
93420
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Nick Alter
nickalter@mindspring.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

6135 Radcliffe Dr.
San Diego
CA
92122
United States

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Tama Becker-Varano
tamambv@msn.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

2023 El Cerrito Pl
Los Angeles
CA
90068
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Laura Fox
foxfhof@aol.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

po box 20241
Santa barbara
California
93120
usa

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

To keep this plant running is to condemn a certain number of extra cancers. Please read Jay Gould's research in the book : The Enemy Within.

Sincerely,

judith evered
judy@west.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

1582 Cordova Drive
San Luis Obispo
CA
93405
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Erik Layman
laymanfamily@charter.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

3908 Calle Ariana
San Clemente
Ca.
92672
USA

Mon, 30 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

lynharrishicks
creedmail@cox.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

615 18th St.
Santa Monica
CA
90402
usa

Tue, 31 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

Sincerely,

Maurine Doerken
mbdoerken@earthlink.net

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey

28141 Las Brisas del Mar
San Juan Capistrano
CA
92675
USA

Tue, 31 May 2005

California Public Utilities Commission
505 Van Ness
San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

California Public Utilities Commission 505 Van Ness San Francisco, Ca

Dear Commissioner Brown,

Re: DEIR for steam generator replacements at the San Onofre Nuclear Generating Station

As California ratepayers, we question the conclusion and the premises of the Draft Environmental Impact Report (DEIR) issued for the Proposed Project to replace the steam generators at the San Onofre Nuclear Generating Station (SONGS). The DEIR fails to review several important environmental impacts that would result from this project.

The SONGS DEIR, blatantly omits an analysis of at least an additional decade of component replacement and maintenance necessitated by the Proposed Project, as well as the production of high-level radioactive waste that will continue to be produced and must be stored on earthquake-active coastal bluffs if the generators are replaced. In addition, the SONGS DEIR relies on a myriad of possibilities and probabilities untried at any other nuclear reactor site.

A plan at San Onofre to either the replace the facility or replace its aging components must begin with weighing the true costs, both economic and environmental. The CPUC DEIR and case-in-chief fail to analyze the full environmental and economic costs of steam generator replacement and therefore is deficient and should be rejected.

California is still reeling from an energy "crisis" and the resultant damage to the state's budget. To blindly go forward with a project that contains so many "estimates" of costs and will likely result in billions of ratepayer dollars being invested could prove extremely costly and financially short-sighted. It is vital that the CPUC acknowledge that this is an aging technology with an unknown future requiring costly replacements and sited precariously on seismically active coastal zones with a daily production of high-level radioactive waste which must be stored on our coast.

The DEIR for San Onofre is riddled with qualifying words and sentences and relies heavily on the unknown. For example:

1) The proposed project is complicated by numerous challenges unique to the SONGS 2 & 3 site when compared to other nuclear plants...De-tensioning tendons of the type at SONGS 2 & 3 has never been attempted at another operating nuclear plant. Most of the tendons are not designed to be de-tensioned or removed. (B-10)

2) Transportation presents many challenges because of the size of the RSG's and the relative inaccessibility of SONGS 2 & 3. Steam generator replacement projects have occurred at other nuclear facilities in the U.S., but normally they are accomplished with delivery to a dock area at the power plant site. (B-11)

3) The specific type of transporter [and costs thereof] would be determined in the future (B-14)

4) Safe transport depends on favorable weather conditions, (B-23) What will be the environmental and economic costs of unfavorable conditions?

5)SCE proposes to obtain all appropriate permits [\[to\]](#) meet all applicable compliance conditions. (B-33). Costs and time elements are not addressed.

6) SCE expects the containment to maintain acceptable integrity. (B-33) The failure to meet this expectation could have extreme environmental and economic consequences.

7) SCE has not identified a potential site for an OSG Storage Facility on the SONGS site. (B-15) Does a site exist and if so, what will be the cost to ratepayers to store?

8) SCE has not specified a disposal location, but the likely destination would be Environ-care of Utah . (B-34) Same as above.

9) Details for loading the original steam generators onto rail cars have not been developed, but they would probably involve lifting components from a multi-wheeled land transporter using portable hydraulic jacks and positioning the rail car underneath (B-35). How can the CPUC pass on costs that have yet to be "developed" in Edison's application?

10) Although the plan for maintaining structural integrity would be developed during the engineering phase...The NRC has yet to review SCE's proposed plan for restoring the containment, but SCE must eventually prepare an engineering evaluation that describes whether the steam generator replacement would affect operation and safety of the facility. (B-36) This scenario is the most frightening, especially when ratepayers consider they have no insurance in the event of a radioactive release.

This partial list of omissions, uncertainties and plans not-yet-developed, should have sent red-flags flying at the CPUC. Yet the DEIR recommends that this frighteningly deficient report be adopted and that the project be found reasonable and environmentally sound.

The DEIR does recognize that the "No Project Alternative would benefit the environment" and that "emissions from relatively steady operation of a bank of portable engines that would be used while

creating the containment opening could cause significant impacts.” (B-22) “Emissions” is extremely narrowly defined in the SONGS DEIR and ignores the emission of radioactive waste that will remain on California’s coast in perpetuity.

The CPUC must determine if planning for alternative energy sources can save ratepayers billions of dollars in investments in steam generators and other failing components at California's nuclear plants. This determination is not sufficiently analyzed in the economic nor the environmental phase of this proceeding. Should ratepayer dollars be used to create electric generation that will benefit our state with new jobs, new property taxes, clean energy and a phase out of the production of high-level radioactive waste? This is a question and answer not found in the DEIR nor anywhere else in this proceeding. The opportunity to move toward renewable generation inherent in the alternatives to the Proposed Project must be seriously considered.

The DEIR’s finding that a license renewal at SONGS and Diablo Canyon is not foreseeable is disingenuous. To date, the NRC has granted over 31 nuclear license renewals. Of these, only 5 have not already replaced steam generators. PG&E and SCE acknowledge that they are performing feasibility studies for license renewals. A license renewal could not occur but for the proposed RSG projects.

License renewal is a reasonably foreseeable outcome of the project. In fact, it is more likely than the numerous yet-to-be-determined phases of the project itself. A costly decision to replace steam generators at California’s nuclear facilities could result in our state being boxed into an energy source that not only requires additional expensive replacements and retrofits, but leaves tons of high-level radioactive waste on our precious coast.

The DEIR finds that replacement power projections would be too remote and speculative to predict exactly how replacement power would be provided, given the wide range of possibilities. The Governor and the state have invested time and resources to create a renewable energy policy. The outcome of the RSG Proposed Projects will run counter to that plan.

The DEIR’s statement that “these [\[alternative\]](#) technologies do, however, cause environmental impacts, and they also have technical feasibility limitations” are accompanied by no analysis. The CPUC cannot issue a blanket dismissal of alternative and renewable energy as expensive or technologically unfeasible, especially when such important issues of the RSG Project such as maintaining integrity of the containment vessels remain an unknown.

Geology: The new steam generators will extend the useful life of California’s Nuclear Plants by at least 8 and 12 years respectively, i.e. at least until the end of the current licensing periods in 2021, 2022 and 2025. This extension of the operations of the facility beyond the “natural” decommissioning point in 2013 creates an additional period of seismic risk. It would therefore be reasonable to expect the DEIR to include an analysis of seismic risks associated with operation of the entire nuclear facilities 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.

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 and on eroding coastal bluffs. 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 DEIS 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, the CPUC may need to push PG&E and SCE to identify other potential sites.

It is the obligation of our state representatives and oversight agencies to reduce economic and environmental risks, especially in the area of energy. To that end we ask the CPUC to reject the DEIR and further review the ALL environmental impacts of steam generator replacement at the San Onofre Nuclear Station. Furthermore, we request that ALL costs of the additional 10 years of operation be included.

I am Director of Planning for Wild Heritage Planners, an environmental organization involved with sustainable development in Southern California. My organization is very concerned about the continuation of this very dangerous use on the coast at San Onofre.

Sincerely,

Jack Eidt
jaqoe@hotmail.com

cc: Governor Arnold Schwarzenegger
cc: Commissioner President Peevey