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Cc:
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Subject: NDCTP - PG&E Comments on Independent Review Panel Hearing presentation and draft recommendations

This email provides Pacific Gas and Electric Company's ("PG&E") comments on the Independent Review Panel's ("Panel") January 25, 2011 Briefing for the California Public Utilities Commission ("Presentation"), conducted in compliance with Decision 10-07-047. In accordance with Administrative Law Judge Darling's direction at the January 25 status conference, these comments are provided by email, with copies to the designated service list in A.09-04-007/ A.09-04-009.

PG&E appreciates the work that the Panel undertook in this thorough review of nuclear decommissioning cost estimates, and especially commends the Panel for its recognition of the many complex and plant-specific factors which are necessarily involved in developing a nuclear decommissioning cost estimate. PG&E believes that the Panel's final report will provide useful information for the Commission and the parties in future nuclear decommissioning cost proceedings.

In preparing the draft report, PG&E requests that the Panel make the following additions and clarifications:

The Presentation contains a recommendation that the facility owners consider sharing actual cost data. This recommendation should recognize that any such cost sharing must take into account restrictions on disclosure of confidential and commercially sensitive materials .

The Presentation recommends that plant security personnel be involved with development of the security assumptions for the decommissioning cost estimate. The report should acknowledge that no Security Safeguards Information (information or material that provides insight to defensive design, construction and materials of the physical plant, armaments, tactics, staffing and schedules) can be discussed.

The Presentation includes recommendations that common license termination and site termination criteria be developed. PG&E requests clarification of the intent of these provisions given the differences between Diablo Canyon Power Plant's situation and the requirements imposed on SONGS associated with its site leases.

PG&E requests that the draft report expand upon the Presentation's suggestion for potential cost-mitigation actions related to expectations concerning low level waste price escalation and waste disposal alternatives.

In the report's discussion of the material on slide 5 of the presentation, in light of the DOE disposal requirements on greater than Class C waste, PG&E suggests that greater than Class C waste be identified as high-level rather than low-level waste.

For clarification, PG&E suggests that the terminology on spent fuel management (slide 6) include a reference to Interim Spent Fuel Storage Installation ("ISFSI"), which term is frequently used in utility nuclear proceedings. Similarly, PG&E suggests the use of "Decommissioning Operations Contractor" or "DOC" for contractor managed, but not owned, decommissioning.

In the report's discussion of regulatory requirements (slide 7), local regulatory requirements should be included.

PG&E appreciates the Panel's consideration of these comments, and looks forward to receiving the draft report.

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