How Much Radiation Would You Like?

At the end of January, the California Public Utilities Commission came to town to hold public hearings on "PG&E's 2021 Nuclear Decommissioning Cost Triennial Proceeding Application A.21-12-007." Which is to say, they took public testimony on the activities and estimated costs surrounding the decommissioning of the Diablo Canyon Nuclear Power Plant.

One particular activity and cost involved in that process, as noted by the indefatigable Alliance for Nuclear Responsibility, is the necessary removal of soil that has been thoroughly contaminated because a nuclear power plant has been sitting on it for the last four decades.

The CPUC held two meetings, a virtual one on Jan. 26 and an in-person session on Jan. 31 in the County Supervisors' chambers.

The Sierra Club was first in line to testify on Jan. 31, and we asked the CPUC judge to include a provision in the proceeding for the consideration of soil removal to result in a residual radiation level of no more than 10 millirems per year, which is less than half the standard of the Nuclear Regulatory Commission. (One millirem is equivalent to the radiation dose received from a coast-to-coast airline flight.)



On the question of whether PG&E should be required to reduce residual radiation on the site to 25 mrem per year or 10 mrem per year, we pointed out that "this is California." To whit, we live in a state with a long tradition of setting high standards for itself in the form of stronger environmental regulations than those mandated by the federal government. That tradition goes back to 1970, when the first iteration of the federal Clean Air Act made a unique exception for California, granting the state a waiver that gave it the ability to substitute its own stricter standards in place of those established at the national level. Ever since, state leaders and lawmakers have fought for stronger environmental regulations than those mandated by the federal government, establishing ambitious policies that have gone on to guide other like-minded states, far beyond the commitments of the federal government.

This time, however, four other states – Maine, Massachusetts, Vermont and New York – beat us to it, having already adopted the 10-millirem standard for nuclear power plant decommissioning.

We pointed out that there is no reason why we should not have the most rigorous established cleanup standard for the decommissioning of California's last nuclear power plant, a standard approved for other states.

Shortly afterward, a representative from Mothers for Nuclear (aka Diablo Canyon employees) testified on behalf of the standard that would leave more than twice as much radioactive emissions on site and assured the CPUC judge that a request to reduce that level is part of a conspiracy by environmental organizations to "make nuclear power more expensive."

Two points:

- 1. PG&E had said on the record that the cost of additional excavation to achieve the 10-mrem standard would be minimal.
- 2. Nobody has to do anything to make nuclear power more expensive. No sinister plot is required, unless you consider market forces a conspiracy. Despite seven decades of every possible tax break and federal subsidy, including immunity from liability, nuclear power keeps getting more expensive as the price of wind and solar energy plummets.

The Diablo Canyon Nuclear Power Plant Decommissioning Cost Estimate should be revised to incorporate the standard that achieves the lowest radiation dose-based levels, which has already been approved by the NRC for four other states.

