

Diablo's Consequences

By Andrew Christie

Santa Lucia Chapter Conservation Committee

The Nuclear Regulatory Commission has received PG&E's application for the renewal of Diablo Canyon's operating license and has received [public input](#) as it goes about the process of determining what



information it should include in an environmental impact statement (EIS) to evaluate the environmental impacts of a renewed license for the nuclear power plant.

As has been mentioned [a time](#) or [two](#), there is no good reason to extend the life of the plant beyond its previously scheduled 2025 closure date, and doing so is an all-round bad idea. But since the application has been filed and the NRC is asking, here's our top ten contributions to a full list of the impacts that must be studied and mitigated or eliminated before the agency can renew the plant's operating license.

Photo by Carole Mintzer

1. The application is for a 20-year license. The EIS must analyze and mitigate twenty years of impacts, not the five years promised by PG&E, Governor Newsom and the California state legislature. This is the same PG&E and the same governor and legislature that once affirmed Diablo was going to shut down in 2025. The EIS should be based on what the application says, not the revocable promises of politicians.
2. That goes for the extended intake and discharge of seawater by the plant's once-through cooling system (OTC). The EIS should disregard PG&E's claim that the ongoing destruction of marine life from Diablo Canyon's use of seawater constitutes a negligible impact on overall species populations, and that "OTC entrainment, impingement, and thermal impacts would not increase" due to a renewal of its license. The EIS cannot make a Finding of No Significant Impact based on this assertion. The California Coastal Commission has pointed out that the issue is decreased biological productivity and alteration of habitat, not how many individual fish the cooling system kills, and that "The proposed license renewal would result in substantial losses of marine life productivity that, but for the proposed extension, would not occur."
3. In considering mitigation for the plant's seawater cooling system impacts, the EIS should review the payments PG&E has been making to a short-term in-lieu fee program -- which does not contemplate an additional twenty years of operation -- and assess the effectiveness of the

programs those payments have funded as compensation for the losses in marine productivity caused by the power plant.

4. Any proposed mitigations should not rely on PG&E's contention that its cooling system results in a loss of productivity equal to 700 acres of rocky reef habitat per year. Studies more comprehensive and accurate than the one PG&E relies on have shown that each year of plant operation is equivalent to a loss of biological productivity equivalent to that produced by over 1,000 acres of reef habitat.
5. The EIS should assess current and future sedimentation rates in the plant's intake cove and the likelihood that PG&E will have to conduct dredging operations over the license renewal period due to additional sediment in Diablo Cove. The alternatives analysis of less damaging activities must incorporate the full twenty-year period of the license renewal.
6. The EIS must quantify and mitigate the impacts of an additional twenty years of Diablo Canyon's thermal discharge on black abalone, protected under the Endangered Species Act.
7. The EIS must provide an analysis of the seismic hazards at Diablo Canyon based on the latest information and science subsequent to PG&E's last comprehensive evaluation. Based on this information, the EIS must determine if the plant design basis – for both the reactor domes and support buildings and infrastructure necessary for uninterrupted energy supply -- can be deemed sufficient to protect against seismic hazards, and if not, what would have to be done to protect the facilities against seismic hazards over the proposed twenty-year period of extended operation and beyond.
8. The number of employees at Diablo Canyon, including full-time and supplemental staff and contract employees brought in during refueling outages, numbers between 1,220 and 2,600. The EIS must evaluate and mitigate twenty years of additional energy consumption and vehicle miles traveled by the plant's workforce. PG&E's 2021 transportation study of level of service (LOS) for local roadways was based on the decommissioning of the plant, not license renewal and continued operations.
9. The EIS must incorporate tsunami analyses for Diablo Canyon by PG&E and the NRC and analyze impacts to operations and personnel, expected sea level rise over the relicensing period, and the potential impacts of coastal storms and seiche hazards.
10. The EIS must analyze coastal erosion and landslide hazards over the twenty-year license renewal period and its potential impacts on facilities and operations. This analysis must be done in concert with the analysis of potential sea level rise over the same period.

As should be needless to add, if the NRC cannot propose mitigations that will reduce or eliminate significant impacts from all of the above, or if such mitigations would be infeasible due to their inordinate cost to ratepayers, the operating license for the Diablo Canyon Nuclear Power Plant should not be renewed.