



SIERRA
CLUB
SANTA LUCIA
CHAPTER

Ms. Jennifer Lucchesi, Executive Officer
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Sent VIA EMAIL: Jennifer.Lucchesi@slc.ca.gov
cslc.commissionmeetings@slc.ca.gov

April 25, 2022

Re: Item #44, Consent Calendar, for the April 26, 2022 meeting
General Lease – Right-of-Way Use for SONGS Unit 1 Conduits

Dear Ms. Lucchesi and Commission Members,

The Santa Lucia Chapter of the Sierra Club requests that the State Lands Commission take this opportunity to strengthen language and policy statewide regarding acceptable millirems levels post de-commissioning. The U.S. Nuclear Regulatory Commission (NRC) has previously approved a 10-millirems- per-year standard for decommissioned nuclear power plants in Maine, Massachusetts, New York, and Vermont. This standard of radiological protection is achievable and the decommissioned Humboldt Bay Nuclear Power Plant (operated by Pacific Gas and Electric) has already achieved the 10-millirems standard.

Diablo Canyon Nuclear Power Plant is now in the process of initiating the decommissioning process. It is in the interest of our community and all residents of the state that the policy of the State Lands Commission is to require the most stringent remediation levels of 10-millirems-per-year. We request that you apply the following language for nuclear power plants in California: ***“Radiological cleanup shall achieve the lowest dose-based levels, measured by millirems per year, previously approved by the Nuclear Regulatory Commission in a License Termination Plan for a commercial nuclear power plant in the United States.”***

Thank you for your consideration of our request.

Regards,

Susan Harvey, Chair
Conservation Committee
Santa Lucia Chapter of the Sierra Club

Cc: Carole Mintzer Ex Com Chair, Andrew Christie Chapter Director