

When Decommissioning Diablo...

Sierra Club and Surfrider have conveyed some concerns to the County

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What we are owed The impacts of the Diablo Canyon Nuclear Power Plant's decommissioning will be large and lasting. As mitigation, PG&E should be required to permanently conserve all 12,000 acres of land around the plant.

On Dec. 6, the local Sierra Club and Surfrider chapters responded to SLO County's Notice of Preparation of an Environmental Impact Report (EIR) for the Diablo Canyon Decommissioning Project. Below is a condensed version of our comments.

First and foremost, we requested that all comments received on this project be forwarded to California Coastal Commission staff. According to the timeline presented by PG&E, the applicant intends to pursue a Coastal Development Permit concurrently with its decommissioning application to the County.

Once Through Cooling (OTC) will be used to cool the Spent Fuel Pools until the material is transferred to casks for storage. We noted that a waiver or new permit will need to be issued for OTC. Operation of OTC beyond the current permit, while necessary for the project, will require substantial mitigation, and the mitigation measures must be imposed in the Phase 1 permit process, not deferred to a later phase.

The EIR should review the permits and Conditions of Approval from the Coastal Commission to ensure that all Conditions of Approval (COAs) associated with the permits were fulfilled, including outstanding issues regarding conservation and trail COAs and terms of the permitting, e.g., spent fuel storage. While

the spent fuel storage installation is a baseline condition, the permitting condition of approval was for temporary storage, hence the baseline condition is also perceived to be temporary. All indicators re-enforce the reality that on-site spent fuel storage will be permanent, and permanent storage violates the language and conditions of the original permit.

The spent fuel storage facility will experience a “change in intensity of use,” thereby triggering the Coastal Development Permit requirement. Special Condition 2 of the 2004 permit for the Independent Spent Fuel Storage Installation (ISFSI) uses an even lower standard for requiring a new or amended permit when “changes not described in permit submittals” occur. The following changes, both separately and in aggregate, meet both standards for requiring a new/amended Coastal Development Permit for the ISFSI:

1. An increase in the term of expected use of the ISFSI from interim to indefinite and probably permanent.
2. Demolition of the rest of the facility that generated the waste, which turns the ISFSI into a stand-alone facility with no necessity to be on its current site.
3. Reduction of the security buffer zone from 12,000 acres to less than 100 acres, which would require significant new security structures and procedures.
4. Commencement of commercial activities immediately outside of the new 100-acre facility, which will have employees without security clearances, also increasing security risks.
5. An increase from 58 SNF storage canisters to 138, which will max out and overcrowd the ISFSI, increasing various risks.
6. A new generation of dry storage casks to be stored in the ISFSI are designed to withstand higher heat levels, which increases risks. The current ISFSI permit is based on the existing casks. A new permit is necessary to determine if the existing ISFSI is adequate for storage of the new casks.

The entire decommissioning is dependent on the ISFSI becoming the permanent onsite storage facility. Although it requires a separate permit, that permit should be considered either before or concurrently with the decommissioning. The fuel stored in the ISFSI will increase by 200 percent, and an entirely new waste facility will be built to store radioactive equipment waste. Permanent storage of this highly radioactive material requires appropriate mitigation. The two facilities must be permitted for these future uses prior to the demolition, or there will be no place to put this waste. The Coastal Act requires submittal of related permits simultaneously.

PG&E plans to develop and install an independent cooling system for the Spent Fuel Pools that enables abandonment of the in-place plant systems supporting cooling. A separate permit should be required for the Spent Fuel Pool cooling system.

Given the need for ongoing monitoring of both the ISFSI and the new Waste Storage Facility, an inspection, monitoring and reporting program similar to the one required for the San Onofre decommissioning is appropriate. The County and the Coastal Commission should have the power to require inspection, maintenance, and annual reports. The Executive Director of the Coastal Commission and an appropriate officer of the County should have the power to require new or amended permits based on such reports.

The dismantling and segmentation of the most radioactive components of the facility will be done under water. We could not find a reference to how that water will be disposed of. Is the groundwater aquifer capable of producing 95 ac/y (26 million gallons) when the decommissioning is at peak water use in 2032 and beyond? If necessary, the EIR should include an analysis of where additional imported water will come from. The Project Description identifies various toxins present in the groundwater. We request that the EIR analyze what effect the groundwater pumping might have on the quality of the groundwater when decommission and restoration are complete.

The decommissioning process will require the permitting of a permanent storage facility on-site for radioactive equipment waste material. New industrial facilities are generally not permitted under the same permit as a demolition permit. In addition, the Nuclear Regulatory Commission requires a site-specific waste handling permit for the radioactive equipment waste facility. This will be under the County's jurisdiction, and the County should follow the precedent established by the Coastal Commission of providing perpetual conservation and coastal access easements as mitigation for Diablo permits. The Project Description is clear that there are significant risks attendant to permanent or very long-term storage of highly radioactive material on site. These kinds of storage will require significant commensurate mitigation measures.

We do not see a means for proper mitigation for such long-term impacts within Parcel P. A requirement for offsite mitigation in the form of permanent and irrevocable conservation and public access easements on the surrounding lands -- including North Ranch, Wild Cherry Canyon, and South Ranch -- is the only appropriate mitigation measure available. In addition, the Pecho Coast Trail should be extended along the coastal bluffs in South Ranch, Parcel P, and North Ranch to connect to the Point Buchon Trail, completing an essential link in the California Coastal Trail.