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American Nuclear Society comments to the California Energy Commission on the Need to Reconsider Retirement of the Diablo Canyon

Additional submitted attachment is included below.



August 12, 2022

To: California Energy Commission
715 P Street
Sacramento, California 95814

Subject: American Nuclear Society Comments to the California Energy Commission
on the Need to Reconsider Retirement of the Diablo Canyon Nuclear
Power Plant (Docket No. 21-ESR-01)

On behalf of approximately 10,000 nuclear technology professionals that make up the American Nuclear Society (ANS), many of whom live in California, we urge you to take prompt and effective action to ensure that California has the option of generating clean, reliable power from Diablo Canyon Units 1&2 past the currently scheduled shutdown dates in 2024 and 2025.

While we see a clear value to Californians from continued Diablo Canyon operation, we recognize that it is a contentious issue in the state. We emphasize below a number of key points supporting the need to reconsider past decisions in light of new information and take action to preserve the option of continued operation of both Diablo Canyon nuclear power reactors past their currently scheduled shutdown dates.

- Diablo Canyon has been a generator of clean electricity (with essentially no greenhouse gas emissions) for the people of California for more than three decades
- It is important to maximize the generation of clean electricity in order to address climate change
- Californians need reliable electricity for economic prosperity, public health and safety, and quality of life
- Due to the western drought and other conditions, there are valid concerns about the reliability of California's electricity supply now and in the future
- Unlike some other clean electricity sources, Diablo Canyon can generate electricity reliably around the clock and all year long
- While there is considerable uncertainty about the future electricity supply situation in California and the western region, it appears likely that Californians will need clean electricity generation from Diablo Canyon for years to come
- It is not necessary to make a final decision about Diablo Canyon today
- However, for technical, regulatory, and business reasons, if Diablo Canyon is to operate past its currently scheduled shutdown dates, action must be taken now to preserve that option

- A key action is to direct Pacific Gas and Electric to restart the process of obtaining a renewed operating license for Diablo Canyon from the Nuclear Regulatory Commission
- The cost of taking action now to preserve the future option will be small compared to the overall cost of California's clean energy transition

Being willing to reconsider past decisions in light of new information is a hallmark of good governance; so too are gathering as much information as possible before making extremely consequential decisions and keeping options open. Restarting the license renewal process and taking other required actions for continued Diablo Canyon operation is consistent with these principles. It would be imprudent for the California Energy Commission and other responsible state agencies not to take immediate action to preserve the Diablo Canyon option.

Finally, we respond to those critics who claim that continued operation of Diablo Canyon is not safe. The Nuclear Regulatory Commission (NRC), the country's independent agency overseeing nuclear safety, should be making that assessment – not avowed foes of nuclear energy. The NRC has the technical resources and expertise to evaluate a Diablo Canyon license renewal application, and its only bias is toward protection of public health and safety. We encourage you to take action to facilitate the submittal of a Diablo Canyon license renewal application by Pacific Gas and Electric. That will enable the NRC to render an informed and impartial assessment of the safety of continued operation of Diablo Canyon past the currently scheduled shutdown dates – which should be the goal of all parties.

We attach a recent op-ed written by the ANS immediate past president and two prominent and knowledgeable nuclear experts from California. The op-ed supports our position that prudence calls for your prompt action to preserve the option of continued Diablo Canyon operation past 2024 and 2025.

Please contact us if you have any questions.

Sincerely,



Dr. Steven Arndt
President,
American Nuclear Society



Craig Piercy
Executive Director and CEO,
American Nuclear Society

Diablo Canyon: What next?

Fri, Jul 8, 2022, 8:00AM
Nuclear News

By George Apostolakis, James Ellis, and Steven Nesbit

The state of California recently and quite sensibly cracked the door back open for continued operation of the Diablo Canyon nuclear power plant past the current operating license expiration dates in 2024 (Unit 1) and 2025 (Unit 2). The nonprofit North American Electric Reliability Corporation's recently released [2022 Summer Reliability Assessment](#) highlights the risk of electricity shortages in California. Given that concern, as well as the benefits of continued Diablo Canyon operation—including much needed clean, reliable energy; good jobs; and potential for large-scale production of fresh water—another look at the shutdown decision made several years ago is clearly warranted. Sen. Dianne Feinstein (D., Calif.) reinforced this point when she added her voice to the growing chorus of policymakers advocating extended operation for Diablo Canyon.

So, what next? Expressing a willingness to take a second look is the necessary first step, but it must be followed by concrete actions to carry out that reconsideration and enable continued operation of the power plant. It is not necessary to make a final decision today, but action is needed now to preserve the option of continued operation in the future.

First and foremost, the state of California should encourage Diablo Canyon's owner, Pacific Gas and Electric (PG&E), to take immediate steps to resubmit to the Nuclear Regulatory Commission the application for renewal of the plant's operating licenses—this is critical. License renewal was well underway in March 2018 when PG&E officially withdrew the application pursuant to a state-brokered agreement to take the reactors out of service in 2024 and 2025. Time will be required to restart and complete the license renewal process. If it proves impossible to finish in the available time, there are regulatory measures that could allow interim operation, provided the application is resubmitted in a timely manner.

Being willing to reconsider past decisions in light of new information is a hallmark of good governance; so too are gathering as much information as possible before making extremely consequential decisions and keeping options open. Restarting

the license renewal process is consistent with these principles. The NRC is a competent and impartial regulatory authority, and so a favorable decision regarding license renewal would provide objective assurance that the plant can continue to operate safely in the future, as it already has for many years. Restarting license renewal now is a prudent action that will serve Californians' best interests and would not prejudice the final decision on whether to keep the units running past their expiration dates. The monetary investment in license renewal over the next few years is small, compared with the investments necessary to ensure a clean and secure future energy supply for California.

In addition to the state of California, PG&E, and other stakeholders working cooperatively and promptly to resubmit the renewal application, these parties must carry out all other necessary actions to preserve the option of future Diablo Canyon operation. It is important to not foreclose by inaction the opportunity to continue generating clean, secure, and affordable electricity at Diablo Canyon.

George Apostolakis was a professor at the Massachusetts Institute of Technology who served as a commissioner of the Nuclear Regulatory Commission. He lives in California and directs the Nuclear Risk Research Center in Japan.

Admiral James Ellis, Jr. retired as president and chief executive officer of the Institute of Nuclear Power Operations after a career in the U.S. Navy. He is an Annenberg Distinguished Fellow at the Hoover Institution in Stanford, Calif.

Steven Nesbit retired from Duke Energy, the nation's second largest nuclear utility, and is the Immediate Past President of the American Nuclear Society.