

DOCKETED	
Docket Number:	21-ESR-01
Project Title:	Energy System Reliability
TN #:	251134
Document Title:	Rachel Raiyani Comments - Opposition to Keeping Diablo Canyon Power Plant Running Through 2029-2030 due to High Costs and Safety Issues
Description:	N/A
Filer:	System
Organization:	Rachel Raiyani
Submitter Role:	Public
Submission Date:	7/21/2023 2:50:35 PM
Docketed Date:	7/21/2023

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Submitted On: 7/21/2023

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Opposition to Keeping Diablo Canyon Power Plant Running Through 2029-2030 due to High Costs and Safety Issues

Additional submitted attachment is included below.

Dear California Energy Commissioners,

I write to you at this time to strongly oppose any effort to keep the Diablo Canyon Nuclear Power Plant open beyond the original decommission dates set for both units one and two, being 2024 and 2025, respectively. There are many important arguments to oppose this extension of operation, but this letter will only focus on a few in detail.

Many of the arguments for the power plant to continue operating rest on the worry that ceasing operations will stress California's power grid, and this is the best way to ensure the state's energy reliability. This is not the case. In fact, there are many safer and cheaper alternatives to this plant that could take on the load that the plant currently provides.

PG&E's own analysis showed that the retirement of the plant would not have an adverse impact on system reliability or local reliability.¹

The Utilities Reform Network's (TURN) analysis² found that ratepayers would benefit from the site being closed down. In a subsequent 2022 analysis titled "TURN Concerns About Governor's Proposal to Extend Diablo Canyon Operation," TURN's Mark W. Toney said that the state's proposal to extend Diablo Canyon's operation will cause the costs to ratepayers skyrocket. Keeping the plant open would only burden consumers with all ongoing Diablo Canyon costs, including capital, operations, insurance, taxes, fuel, pensions/benefits, mitigation, and storage costs, decreasing the affordability of the resource. There is no mechanism to cap the costs that the consumers would pay³.

This is worrisome because when the plan to decommission the Diablo Canyon Nuclear Plant was first approved, PG&E deferred maintaining key components of the plant. With the extension proposed by the governor, if PG&E does its due diligence to upkeep the plant and make sure the systems are in order, those maintenance costs will reflect on the ratepayers' bills.

Unfortunately, we cannot even be certain that PG&E will tend to the components of the plant that need to be maintained. In a formal Dissenting Professional Opinion, Dr. Michael Peck, the then-Senior Resident NRC inspector at Diablo Canyon said that there was a failure to show that plant specification required structures, systems, and components (SSCs) were "operable." Many of these issues arised from the SSCs not being adequate on the seismic design basis or safety analysis⁴.

This nuclear power plant is in close proximity to at least four major fault lines: the San Luis Bay

¹ PG&E's position can be found on pdf pg. 8 of the [Proposed Decision of ALJ Allen](#). The decision was approved, as indicated in a [CPUC press release](#) on January 18, 2018.

² TURN's position can be found on pdf pg. 10 of the [Proposed Decision of ALJ Allen](#).

³ TURN's 2022 analysis can be found in "[TURN Concerns About Governor's Proposal to Extend Diablo Canyon Operation](#)."

⁴ A summary of Dr. Michael Peck's views can be found in Differing Professional Opinion- [Diablo Canyon Seismic Issues section 1.0 Summary \(pg 1\)](#).

Fault, the Los Osos Fault, the Hosgri Fault, and the Shoreline Fault. When the plant was first being built, PG&E claimed that the plant was not close to any fault lines. Shortly after, the Hosgri fault was discovered, and PG&E tried to deny its existence until they could no longer. After that, they asked for a waiver to allow the plant to be built, saying no other fault would be found. Five more faults were found after the decision to build the plant, with the Shoreline fault being within 600 meters of the plant. Some of these faults have connections, and many of these faults can produce earthquakes that are larger than the plant was designed to withstand.

If an earthquake does occur, it poses a huge risk of massive release of radioactivity due to breach of cooling systems which could fail as a result of such an event. Consequences as bad or worse than the Chernobyl nuclear power plant are possible.

I ask the commissioners to understand that there are hindrances to each argument posed to keep this plant open for longer than originally planned. Keeping Diablo operating would set back our ability to tap into the real power of renewable energy, which many others have already demonstrated this power can make up for the energy lost through the decommission of this plant. Efforts to keep this dangerous nuclear plant running would interfere with our ability to provide **reliable, safe, renewable, and affordable** energy to our residents. And most importantly, we are risking human lives and the environment for a company that has proven time and time again that they do not act with integrity.

I oppose the extension of Diablo Canyon Power Plant to 2019-2030. It is a cost trap in the hands of the wrong people, and most importantly, it is a danger to our environment and our humanity.

Thank you.

Best,
Rachel Raiyani