

*Comment Received From: Californians for Green Nuclear Power, Inc.
Submitted On: 8/12/2022
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Excerpts from a Pair of CCST Reports Supporting Continued DCCP Operation Requested by the CEC in 2011

Here are excerpts from a pair of 2011 reports commissioned by the California Energy Commission which asked the eminent scientists and engineers at the California Commission on Science and Technology (CCST) to determine the safest and most cost-effective way to achieve California's emissions goals by 2030.

"California's Energy Future: The View to 2050" Release Date: May 24, 2011 | Last Updated Date: February 19, 2015 <https://ccst.us/reports/californias-energy-future-the-view-to-2050/> <https://tinyurl.com/CCST-Nuclear-1>

... Nuclear power can provide constant, reliable emission-free energy with a much lower and more easily met requirement for load balancing. Roughly 30 new nuclear power plants could provide two-thirds of California's electric power in 2050. However, nuclear waste storage remains a significant problem with existing reactor technology, not to mention public concern, especially in the wake of Japan's recent earthquake and tsunami disaster....

"California's Energy Future - Powering California with Nuclear Energy" Release Date: July 1, 2011 | Last Updated Date: February 19, 2015 <https://ccst.us/reports/californias-energy-future-powering-california-with-nuclear-energy/> <https://tinyurl.com/CCST-Nuclear-2>

... Jane C.S. Long, associate director at large for Lawrence Livermore National Laboratory and co-chair of the California's Energy Future study. Population growth and energy demand will eventually force a decision on California's energy strategy, especially with the requirement for drastic reduction in emissions. "By 2050, California's population is expected to rise to 55 million people. That increase, accompanied by economic growth, will likely require a doubling in electricity production, but with virtually no emissions, to meet state goals," says Jane Long. "That is why nuclear power could prove one important option for meeting those strict and necessary standards."

See also the attached slides from a June 1, 2011 CCST presentation to the California Energy Commission. Those slides support the continued safe operation of DCCP beyond 2025 and the re-commissioning of the San Onofre Nuclear Generating Station (SONGS)

Gene Nelson, Ph.D. CGNP Legal Assistant

Additional submitted attachment is included below.

Assessing and Managing the Risk of Nuclear Power: Impact on California

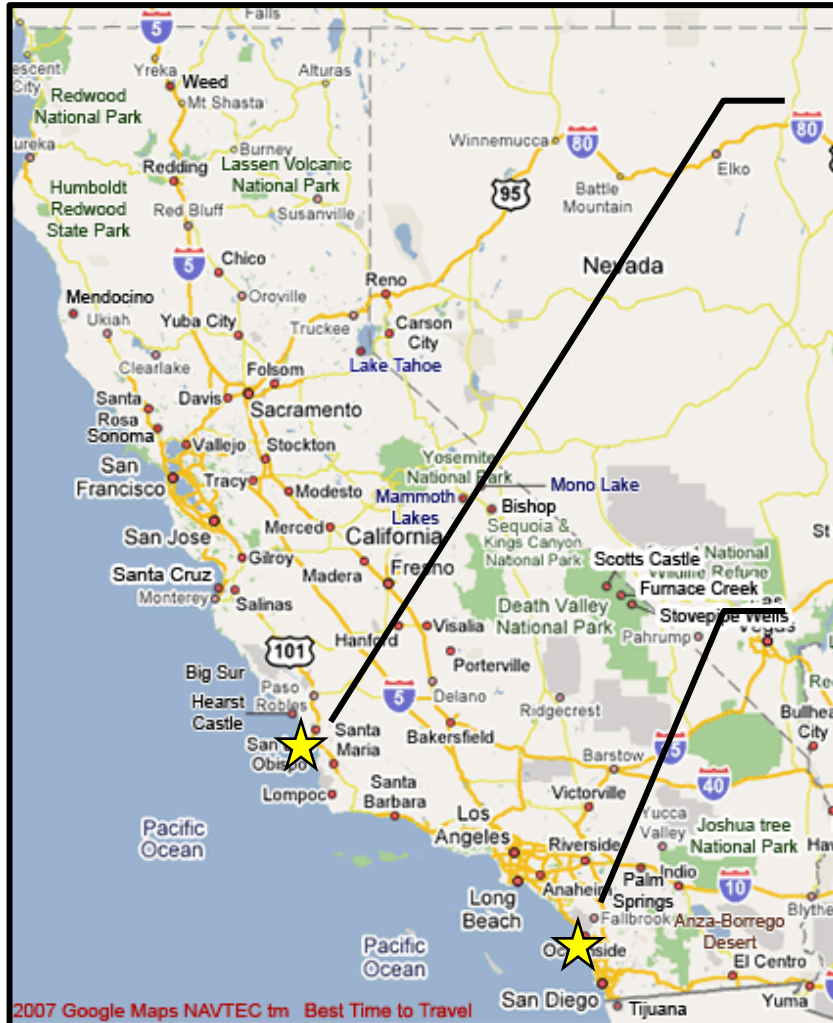


California Council on Science and Technology
Meeting on “Risk, Uncertainty and Trust in Scientific Data and Analyses”

Edward Blandford, PhD
Center for International Security and Cooperation
Stanford University
June 1st, 2011



Nuclear Power in California



Diablo Canyon Power Plant (DCPP)

- 2 X 4-Loop Westinghouse PWRs (1,100 MWe each)
- Unit 1 commissioned in 1985 and Unit 2 commissioned in 1986
- Owned and operated by PG&E

San Onofre Nuclear Generating Station (SONGS)

- 2 X 2-Loop CE PWRs (1,100 MWe each)
- Unit 2 commissioned in 1983 and Unit 3 commissioned in 1984
- Owned and operated by SCE

2007 Google Maps NAVTEC tm Best Time to Travel



Three major policy questions arise from the Sendai tsunami and the nuclear accident at Fukushima

- How should the nuclear accident at Fukushima affect our policies for existing reactors?
 - Policies for regulating safety (e.g., lessons learned)
 - Policies for license renewal (e.g., should existing nuclear plants be shut down before, or after, existing coal plants?)
- Are the new, Generation III reactor designs sufficiently safe to be built, considering lessons learned from the Fukushima accident?
- Are there broader lessons for protecting public health and safety?
 - The Japanese tsunami early warning system saved many lives
 - » compare the 2004 Sumatra tsunami, 230,000 fatalities, with Sendai ~28,000
 - The U.S. west coast from northern California to Alaska has thrust faults that can generate similar tsunamis



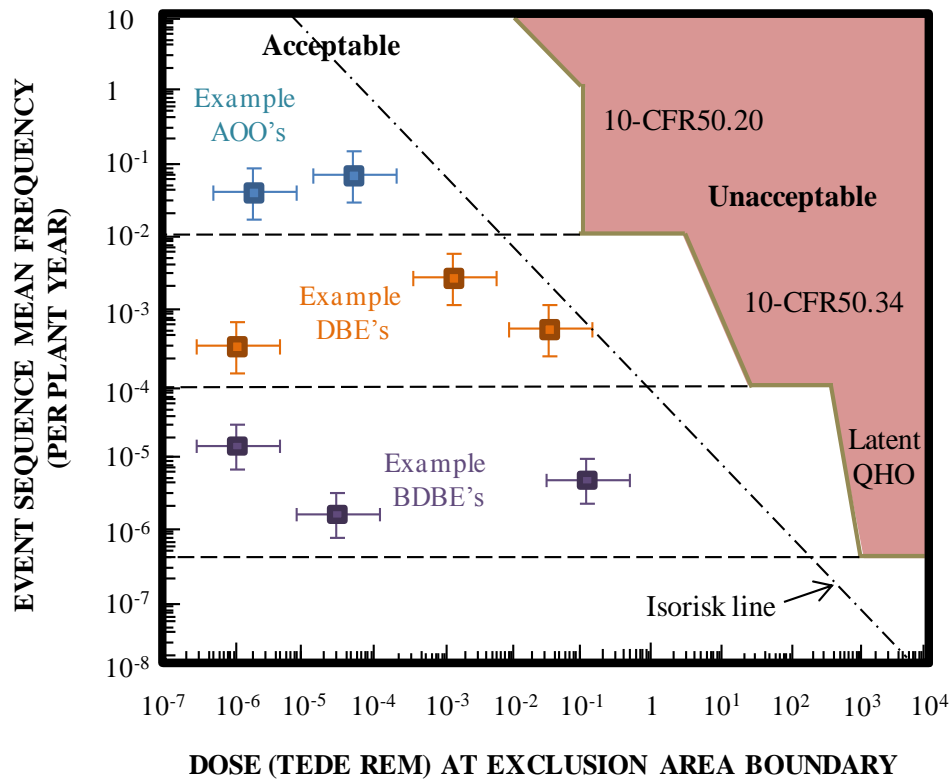
The U.S. Nuclear Regulatory Commission published safety goals for nuclear power in 1986

- “The risk to an average individual in the vicinity of a nuclear power plant of prompt fatalities that might result from reactor accidents should not exceed one-tenth of one percent (0.1 percent) of the sum of prompt fatality risks resulting from other accidents to which members of the U.S. population are generally exposed.”
- “The risk to the population in the area near a nuclear power plant of cancer fatalities that might result from nuclear power plant operation should not exceed one-tenth of one percent (0.1 percent) of the sum of cancer fatality risks resulting from all other causes.”

No comparable requirements exist for fossil fuels



The USNRC safety goals can be displayed on a frequency/consequence chart



Anticipated operational occurrences

Design basis events

Beyond design basis events



Deterministic vs. Risk-informed vs. Risk-based



USNRC relies heavily on Defense-in-Depth philosophy where an appropriate balance between protection, mitigation, and emergency preparedness must be established

The United States response to Fukushima

- Major ongoing activities:
 - US NRC Task Force 90 day review
 - DOE reviewing critical nuclear installations
 - INPO independent review
 - US NRC and DOE monitoring situation in Japan and providing support



Major questions raised surrounding risk analysis and management of current fleet

- Is there adequate protection from natural phenomena within the design basis?
- Is there sufficient consideration of natural phenomena that falls outside of the design basis?
- Are US nuclear facilities adequately prepared for mitigation for long-term station black outs?
 - Multiple unit sites?
- Do US nuclear facilities have adequate emergency preparedness measures?
- Does the US NRC have adequate programs in place to deal with similar issues?



Recent US NRC findings at DCPD and SONGS

- NRC inspectors focused on what licensees were doing with respect to the capabilities and strategies they had to respond to large fires/explosions, station blackout events, and flooding events
- No major safety-related findings but examples of findings:
 - Lack of a written agreement for fuel oil supply to support emergency diesel generators when operation was required for more than 7 days (SONGS)
 - Extension cords used to connect power from portable generator to plant equipment were not re-verified to be of an adequate length (SONGS)
 - Licensee identified that the memorandum of understanding was not in place with the California National Guard for the contingency to supply diesel fuel to the site when the main road is unavailable (DCPD)

Cannot overstate the importance of having effective self-assessment and corrective action program



The accident at Fukushima provides important lessons learned

- Severe natural events are possible
 - U.S. west coast is likely underprepared for protecting coastal residents from tsunamis
 - The nuclear accident at Fukushima is an important contributor to the overall costs of the disaster
 - » Likely greater than \$100 billion from a total cost of ~\$300 billion
 - » But public health impact from accident is much smaller
- The most important lesson for managing beyond-design-basis events in existing infrastructure is to have planned ahead
- Some key remaining questions:
 - Ability to cope with multiple unit accidents
 - Clear line of command (less of an issue in the United States)
 - Mutual aid agreements



Backup Slides



Station Blackout: Assessing Coping Time

“The reactor core and associated coolant, control, and protection systems, including station batteries and any other necessary support systems, must provide sufficient capacity and capability to ensure that the core is cooled and appropriate containment integrity is maintained in the event of a station blackout for the specified duration.”

Based on four factors:

1. The redundancy of the onsite emergency ac power sources;
2. The reliability of the onsite emergency ac power sources;
3. The expected frequency of loss of offsite power; and
4. The probable time needed to restore offsite power.

In summary, the US NRC evaluates the overall design of onsite and offsite electrical system reliability and determines an appropriate coping time

- Coping time varies from plant to plant and can range from 4 to 36 hours

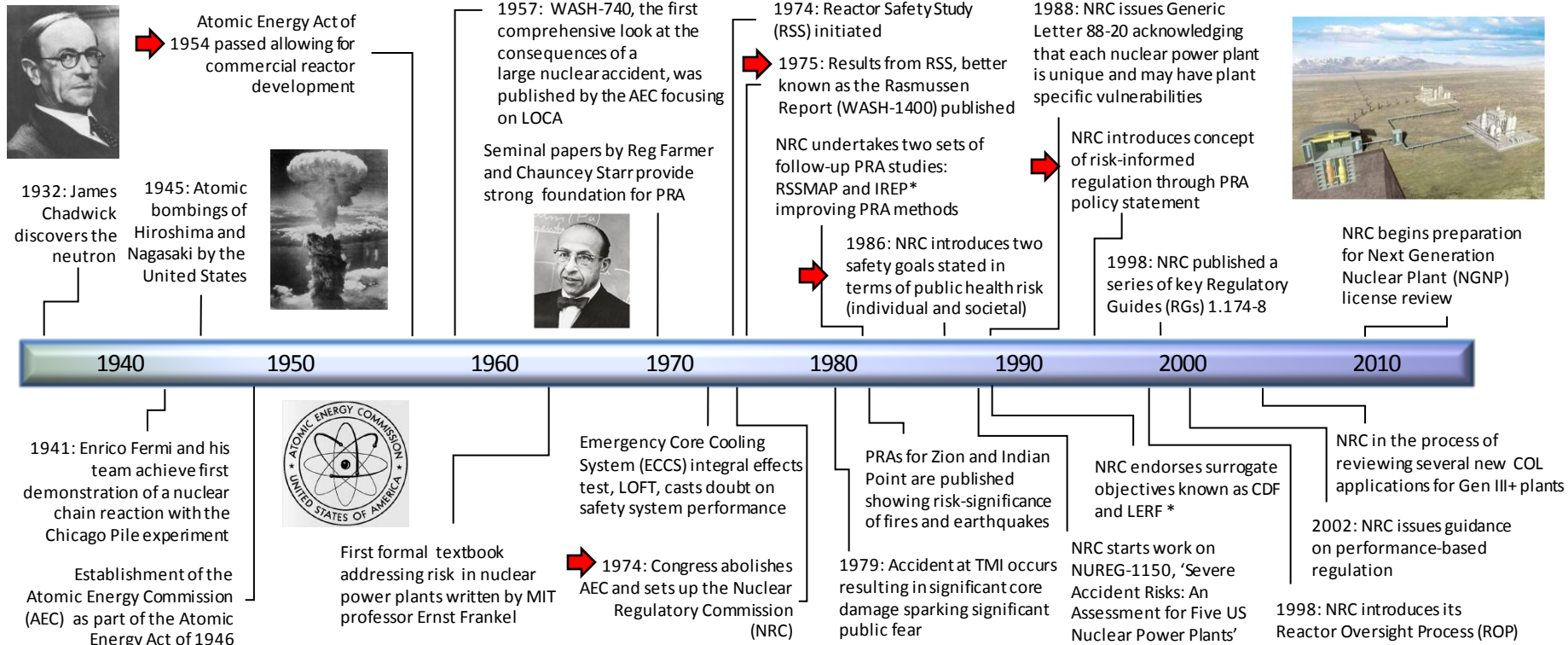


February 2002 USNRC Order: Section B.5.b

- Following 9/11, USNRC developed strategies that required plant licensees to “maintain or restore core cooling, containment, and spent fuel pool cooling capabilities under the circumstances associated with loss of large areas of the plant due to explosions or fire”
- Originally intended for coping with fires and explosions, NRC contends strategies would help protect against natural hazards such as severe earthquakes and floods
- USNRC will review adequacy of B.5.b strategies for dealing with non-security severe events by end of 90-day review



History of PRA in the nuclear industry



RSSMAP = Reactor Safety Study Methodology Application Program
IREP = Interim Reliability Evaluation Program

CDF = Core Damage Frequency
LERF = Large Early Release Frequency



STANFORD UNIVERSITY

Risk in Nuclear Energy

Perception and Reality

Burton Richter

California Council on Science and Technology

June 1, 2011

Sacramento, CA

Risk in Transportation

Deaths per billion passenger-kilometres	
Air:	0.05
<u>Bus:</u>	0.4
<u>Rail:</u>	0.6
<u>Van:</u>	1.2
<u>Water:</u>	2.6
<u>Car:</u>	3.1
<u>Bicycle:</u>	44.6
<u>Foot:</u>	54.2
<u>Motorcycle:</u>	108.9

Public Health Impacts per TWh*

	Coal	Lignite	Oil	Gas	Nuclear	PV	Wind
Years of life lost: Nonradiological effects	138	167	359	42	9.1	58	2.7
Radiological effects: Normal operation Accidents					16 0.015		
Respiratory hospital admissions	0.69	0.72	1.8	0.21	0.05	0.29	0.01
Cerebrovascular hospital admissions	1.7	1.8	4.4	0.51	0.11	0.70	0.03
Congestive heart failure	0.80	0.84	2.1	0.24	0.05	0.33	0.02
Restricted activity days	4751	4976	12248	1446	314	1977	90
Days with bronchodilator usage	1303	1365	3361	397	86	543	25
Cough days in asthmatics	1492	1562	3846	454	98	621	28
Respiratory symptoms in asthmatics	693	726	1786	211	45	288	13
Chronic bronchitis in children	115	135	333	39	11	54	2.4
Chronic cough in children	148	174	428	51	14	69	3.2
Nonfatal cancer					2.4		

*Kerwitt et al., "Risk Analysis" Vol. 18, No. 4 (1998).

Risk Reduction Philosophy:

- Nuclear power plants must prepare for extreme events with a defense in depth
- Maximum credible earthquakes and floods
- Loss of off-site power and on-site power
- Hydrogen generation as a result of fuel damage during loss-of-coolant accidents
- Post 9/11: aircraft impact, loss of large areas of the plant
- Post Fukushima: ??????
- Note that regulators in each country set their own requirements – no universal code

Nuclear Accidents: An Evolving Response to Risk

Three Mile Island (1979) – A Partial Core Meltdown

- Containment System Worked - Little Radiation Offsite

<http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/3mile-isle.html>

Chernobyl (1986) – Runaway Steam Explosion and Fire

- Operators moved into unstable region and disabled all safety systems.
- – No Containment

http://en.wikipedia.org/wiki/Chernobyl_disaster

Fukushima (2011) – Earthquake and Flood

- Failure of Defense in Depth, Investigation Only Beginning

Three Mile Island

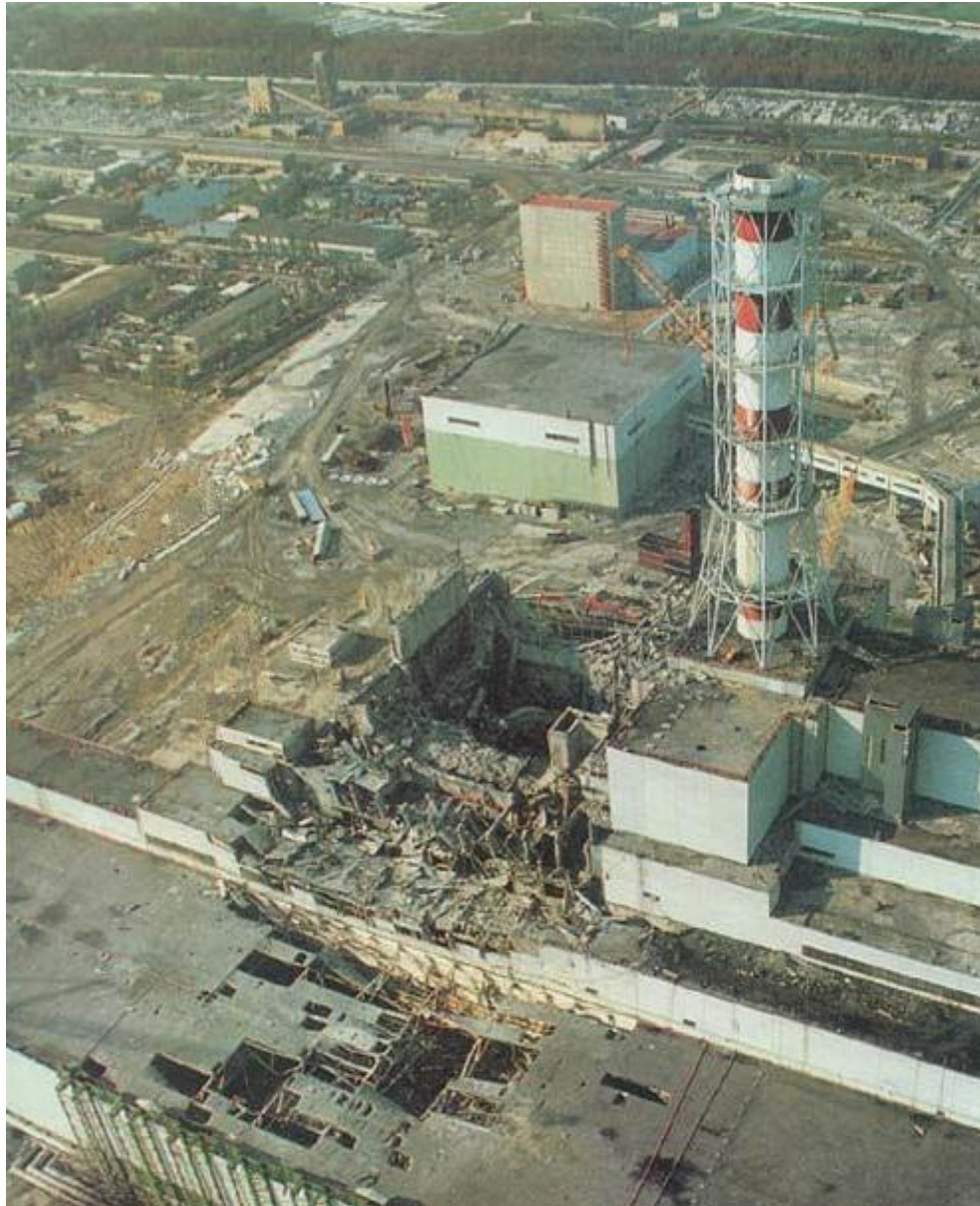


Source: Department of Energy

After TMI

- Major changes in safety regulation and incident reporting
- Many costly modifications of plants to prevent or handle loss of coolant events
- Institute of Nuclear Power Operations set up to:
 - effect prompt exchanges of safety experience
 - establish more rigorous operating standards
 - inspect plants for compliance with new rule
 - Intense focus on operational reliability, increasing from 65% average availability to 91% today.

Chernobyl



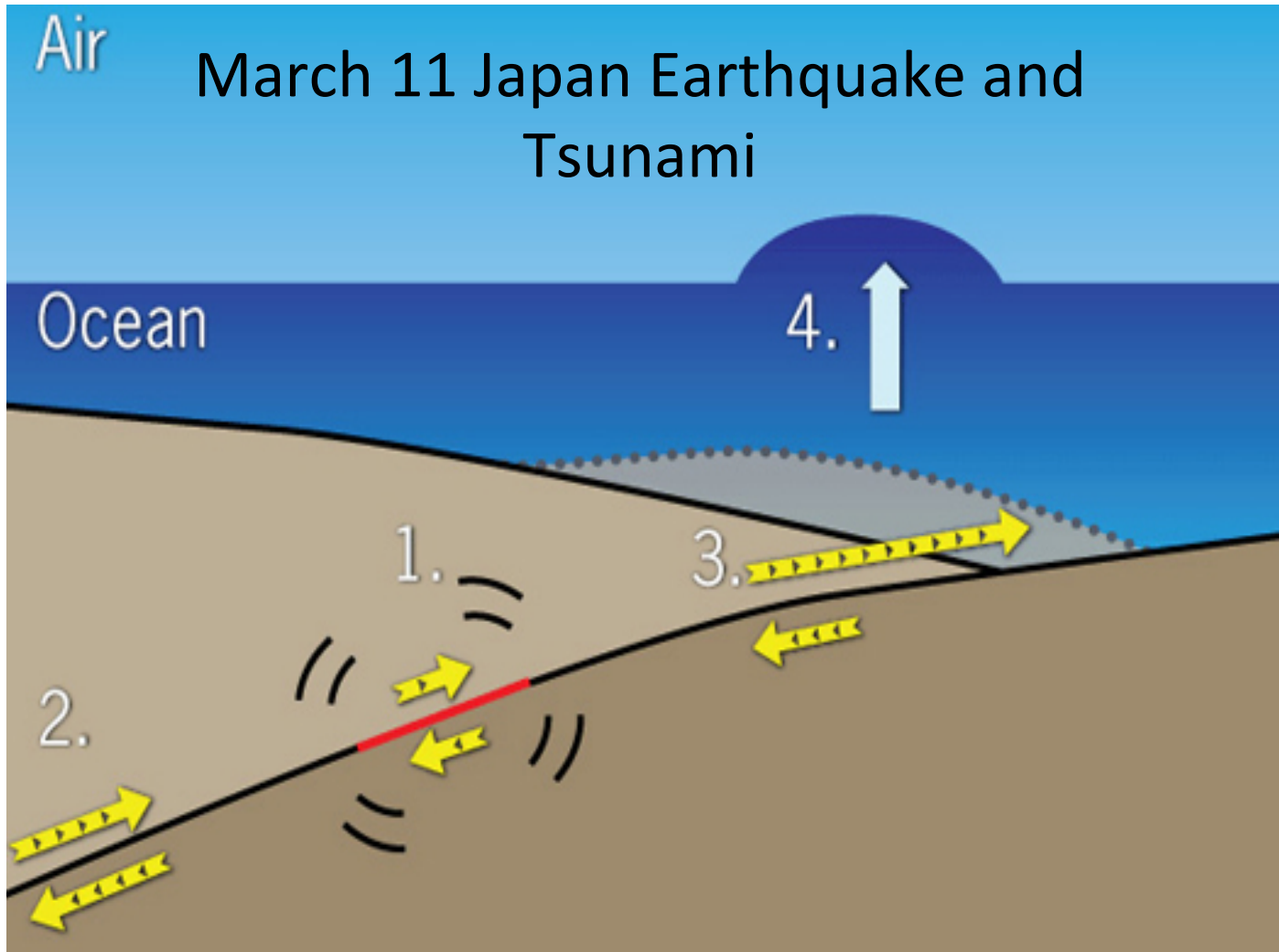
Source Wikipedia

After Chernobyl

- Safety reviews and improvements in RMBK (Chernobyl) undertaken by Russia and the IAEA
- Many RMBKs shut down – others modified to improve safety systems
- Chernobyl reactor design never used for power outside of old Soviet Block - no longer being built

After 9/11

- Extensive reviews of:
 - adequacy of containment if hit by aircraft
 - security of plants from terrorist attack
- Substantial improvements in security provisions (classified)
- Some auxiliary systems strengthened



- 1) Rupture of the fault plane begins at the epicenter.
 - 2) Rupture travels westward, down the fault plane towards Honshu. The island suffers violent shaking for 40 seconds.
 - 3) The upward sloping east side of the fault plane begins to rupture, continuing for 30 to 35 seconds. The sediments overlying the east side expand up the fault plane in response to the force of the rupture.
 - 4) The water above the sediments is pushed into an unstable dome that then flows out in all directions as a tsunami.
- (Credit: Illustration by Anna Cobb)



MIYAKO
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テレトラック
MIYAKO



Fukushima Impact

- Fukushima was and still is a serious incident
- There will be a rethinking of reactor safety and the setting of “design basis” threats.
- Regulators will be given more power (India)
- The actual impact of Fukushima compared to other conventional electricity sources will be small, but radiation is feared and it is too soon to see the impact on public perception.
- Personal opinion – world wide impact will be small

An Essential Safety Requirement

- Independence of Regulators
 - US did it in 1974
 - India did it 2 weeks after Fukushima
 - Japan?
 - Others?

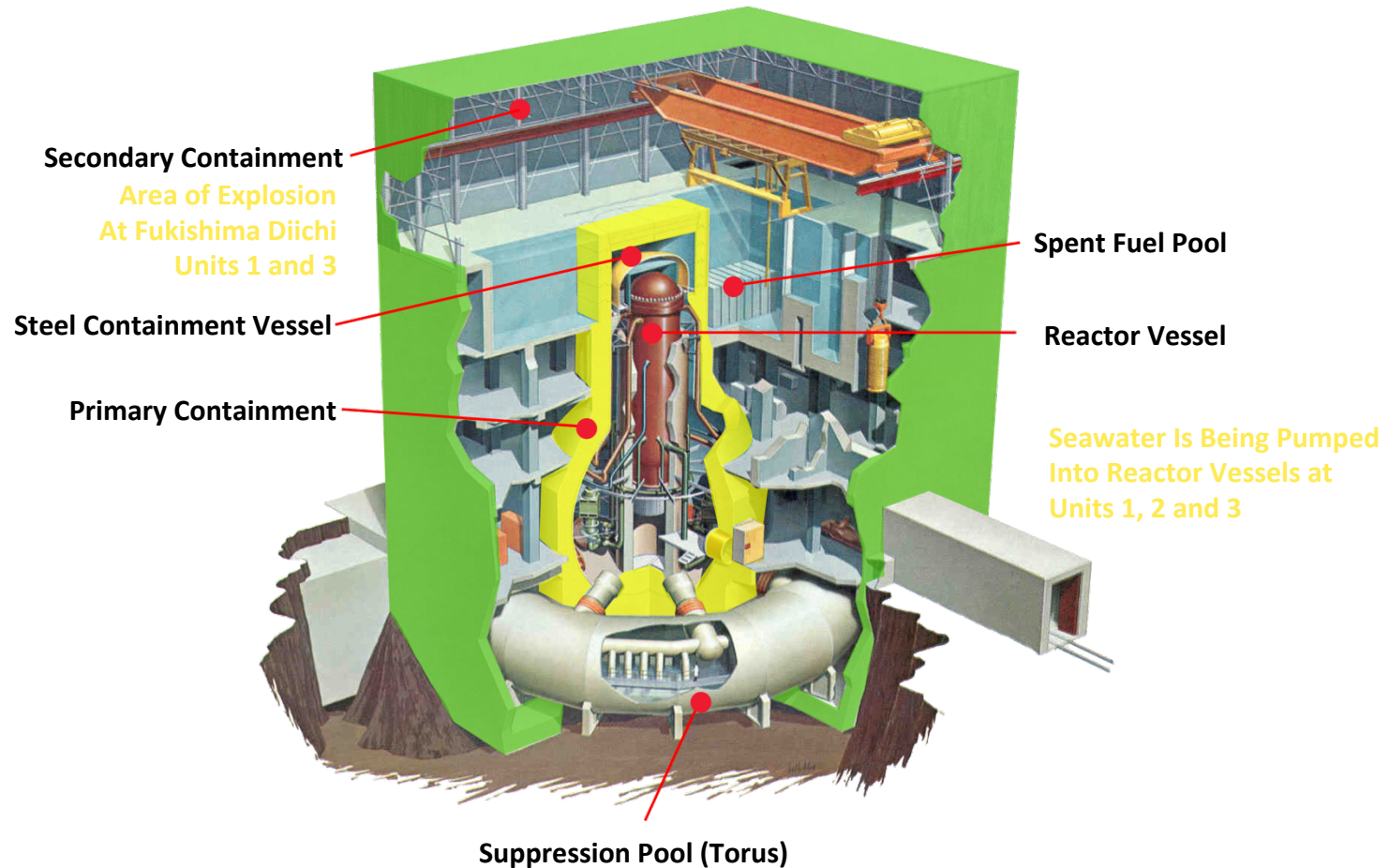
BACKUP

Radiation Exposures

Source	Radiation Dose Millirem/year
Natural Radioactivity	240
Natural in Body (75kg)*	40
Medical (average)	60
Nuclear Plant (1GW electric)	0.004
Coal Plant (1GW electric)	0.003
*Included in the Natural Total	

Boiling Water Reactor Design

Boiling Water Reactor Design At Fukushima Daiichi



Fukushima Daiichi Nuclear Power Plant Before the Accident

