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Continued operation of Diablo Canyon Nuclear Power Plant

We are opposed to the continued operation of DCPN for the following reasons:

1. The operation of Diablo discourages the use of renewables.
2. Diablo is old and unreliable. Maintenance has been deferred. The last replacement for aging parts resulted in a seven-month periodic shutdown of Unit 2 during 2020-21.
3. PG&E is a corporate felon, responsible for nearly 100 deaths, thousands of homes and businesses burned to the ground, and hundreds of thousands of acres scorched. PG&E can not be trusted.
4. Diablo is seismically vulnerable. It sits near multiple active earthquake faults. The proposal to extend the operation would violate the closure agreement established in 2016 and codified by the California legislature and the CPUC in 2018.
5. Ratepayers and taxpayers have already paid out \$85 million in mitigating costs to the impacted communities and millions more toward decommissioning costs.

In addition we ask the following questions:

Where/how will this extra high-level radioactive waste be stored? Currently, there are only plans for the storage of waste generated through 2025.

Diablo's once-through cooling system is now unlawful. How will that be rectified?

Has the cost to construct a compliant cooling system been calculated?

Mary Jane Adams, Ph.D., Klaus Schumann,

Additional submitted attachment is included below.

Cutting Diablo's Risks in Half?

By Fred Frank and Klaus Schumann

"Don't save us here in Japan. Be accountable for yourself!" [Umi Hagitani, at the Steynberg Gallery in SLO on the Second Anniversary of Fukushima.]

We strongly support the Tribune's May 19th editorial that responds to Ms. Hagitani's suggestion on nuclear safety and add the following:

PG&E was recently awarded \$226 million in a settlement of a suite against the Federal Government for the Government's failure to provide a permanent repository for "spent fuel" nuclear waste. PG&E has announced plans to use this money to reimburse customers for the costs of storing the highly radioactive waste at its plant sites. (TRIBUNE, View Point, April 24, 2013). The "pay back" to each customer would be about the cost of one latte' per month for a year. Meanwhile, PG&E is requesting from the State a 15% increase of our base electricity rates and 41% for usage above 130% of baseline!!

We believe rate payers would be much better served if the company would use this money to update and improve Diablo's radioactive waste facilities. If used wisely, the risks for nuclear catastrophes at Diablo could be cut in half.

"Spent fuel" is a euphemism for one of the most dangerous substances on Earth. More than a thousand tons have accumulated and more is added with each day of operation. "Spent fuel" is extremely radioactive, about 1 million times more radioactive than "fresh fuel." Under EPA regulation, it has to be isolated from humans for 1 million years. At Diablo, about 80% of it is stored in two large water-filled storage pools which contain far more radioactivity than the reactors. Worse, both pools are located *outside* of the containment domes in weaker structures.

When Diablo was built, the plan was to ship "spent fuel" off-site after five years of necessary cooling in the pools. 40 years later, *none* of the used fuel has been shipped *anywhere*; consequently, the pools are now five times more densely packed than planned for in the original design. As a result, fires igniting in the pools are now a possibility where there was virtually none before, thereby doubling the sources of risk for catastrophic radiation releases at Diablo. According to Nuclear Regulatory Commission (NRC) studies, a pool fire can have consequences comparable to a reactor meltdown. This is primarily due to the radioisotope Cesium 137, which accounts for nearly 40% of all radio-activity in "spent fuel." It has the consistency of talcum powder and is easily carried off-site in fires or explosions. Much of the off-site contaminations at Fukushima and Chernobyl resulted from Cesium 137. In Chernobyl, it contaminated an area four times the size of SLO County. Each pool at Diablo contains an estimated 20 times the amount that was released at Chernobyl.

There are four potential sources of catastrophic radiation release at Diablo: the two reactors and the two waste pools. All four are vulnerable to a severe loss-of-cooling event which could be induced by earthquake, terrorism, or human error. If PG&E were to transfer enough of the highly radioactive waste from the pools to its dry cask storage facility, the risk sources of disastrous radiation releases would be reduced by 50%! Dry casks are a safer method of storing "spent fuel" because they don't require continuous active cooling and spread the radioactivity over many separate containers.

Such a transfer was identified as the "environmentally superior alternative" in the 2004 Environmental Impact Report (EIR) for Diablo's dry cask facility [Diablo Canyon ISFSI FEIR, page 6-9]. However, PG&E did not adopt this alternative. At that time, it was expected that Yucca Mtn., NV, would become the permanent geologic repository for Diablo's "spent fuel" by 2017. Since then, the Yucca Mtn. project has been cancelled, leaving the waste for an indefinite length of time at Diablo Canyon. Moreover, the 2008 discovery of the Shoreline earthquake fault close to the plant has added to the seismic uncertainties and the on-going Fukushima disaster is raising further concerns. According to the latest U.S. Department of Energy proposals, shipping of "spent fuel" from Diablo could start in 2025, at the earliest. But, over the last 50 years, we have heard these federal proposals, timelines and concepts again and again. Yet the dangerous wastes remain at Diablo in ever-increasing amounts with no end in sight.

Proposals and projections notwithstanding, our community continues to live with undetermined seismic hazards and unnecessary risks. Any new proposal to deal with these wastes *must* start with the removal of *any* possibility of fire in Diablo's "spent fuel" pools.

NOTE: Fred Frank is a former County Fire Chief and emergency responder to Diablo Canyon.

Klaus Schumann has been active on Nuclear Waste issues since 1995. Both served for six years as members of the SLO County Nuclear Waste Management Committee. The Committee was formed by the SLO Council of Governments in April of 1996 to address transportation issues and storage options for spent fuel from the Diablo Canyon Nuclear Power Plant.