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September 6, 2022

Alice Reynolds, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

transmitted by email

Re: SB 846-required seismic assessment of Diablo Canyon Nuclear Power Plant

Dear President Reynolds:

I write seeking the Commission's assurance that the pending state-supervised seismic assessment of the Diablo Canyon site will be structured to prevent PG&E's evasion of substantive and timely review by the Independent Peer Review Panel ("IPRP") established pursuant to Public Utilities Code § 712.

The Commission's earlier attempt to carry out the advanced seismic studies required by AB 1632 (Statutes of 2006 – Blakeslee) was severely undermined by PG&E's systematic effort in 2013 and 2014 to circumvent IPRP review after IPRP Report #6 criticized PG&E's approach to ground motion measurement. The Alliance for Nuclear Responsibility ("A4NR") vigorously challenged PG&E's misconduct in A.14-02-008 and A.15-02-023, but agreed to withdraw its pending objections and recommendations pursuant to Section 5.3 of the Joint Proposal to close the plant in 2024/25. To implement this agreement, PG&E required A4NR to co-sponsor joint motions to expunge certain exhibits and transcripts of cross-examination from the evidentiary record of the two proceedings.

With the recent enactment of SB 846 and the role it affords another state-sponsored seismic analysis, this history should not be overlooked.

I have attached A4NR's briefs from the two proceedings to provide a summary of PG&E's extraordinary distortion of the AB 1632 mission, and to emphasize the need for vigorous participation by a renewed IPRP. This new effort should prioritize the greatest sources of uncertainty in calculation of the seismic hazard, include impacts on non-safety SSCs that are

important to plant reliability, and be bolstered by IPRP access to independent consultants (as enabled by SB 846) to ensure robust review. Anything less will predictably recycle PG&E dogma that the plant's 1980s redesign represented a seismic gold standard and that even PG&E's past calculations of risk now look overstated.

Sincerely,

Rochelle Becker
Executive Director

Cc: Karen Douglas
Secretary of Natural Resources Wade Crowfoot
CPUC Commissioners
CEC Commissioners
IPRP Members
DCISC Members
Senator John Laird