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**Comment Concerned About Diablo's Extension**

*Additional submitted attachment is included below.*

Diablo Canyon Power Plant (DCPP) should be shut down on schedule in 2024 and 2025. Extending DCPP's operations interferes with the state's ability to provide safe, clean, and reliable energy to Californians. This comment will discuss some of the various concerns about extending DCPP's operations to 2030.

DCPP's precarious location nearby the four earthquake faults– the Hosgri Fault, the San Luis Bay Fault, the Los Osos Fault, and the Shoreline Fault– is a great concern to the safety of the area.<sup>1</sup> An earthquake or tsunami could cause a disastrous meltdown at DCPP that could leave large swaths of California uninhabitable for generations. The longer DCPP's extension of operations, the probability of a terrible accident increases.

The extension also allows for the production of more nuclear waste. There are no safe options for disposing of the carcinogenic waste that nuclear power plants generate. Creating more nuclear waste with no safe disposal options leads to more opportunities for the waste to leak and contaminate the environment. Unfortunately, the United States is no closer to creating a solution to the nuclear waste problem than it was 50 years ago.

DCPP's continued operations harm the environment in other ways as well. DCPP competes with renewables, taking up space on transmission lines and making it more difficult to build new renewables. For example, California ISO curtails renewable resources when supply outstrips demand.<sup>2</sup> DCPP is inflexible and cannot be ramped down when there is a surplus of energy, so it elbows out resources that can be ramped down. It also uses once-through cooling, which harms millions of coastal organisms per year by sucking in ocean life and water and spitting the heated water back into the ocean. Organisms directly harmed through once-through cooling are usually the base of the coastal food web, adversely affecting the entire ecosystem. On top of these environmental issues, nuclear power is also more costly than wind and solar. Rather than keeping the aging DCPP open longer, California should spend its resources creating safer, cheaper, and greener energy.

The CEC's March report on DCPP's extension is misleading in that it presupposes that DCPP is needed to support grid reliability, and works backwards to justify that claim. Keeping DCPP open past its planned shutdown would only help grid reliability in some worst case scenarios. According to the March report, even with DCPP's scheduled shutdown, California would still meet the planning standard up through 2030, even with a 40% project delay of building new energy resources. Because reliability without DCPP is not an issue with the typical 1-in-10 planning standard,<sup>3</sup> the report decides to look at even less likely scenarios, like a 1-in-14 planning standard. On top of that, the report stacks these unlikely scenarios, such as having a

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<sup>1</sup> The [Differing Professional Opinion](#) submitted by Dr. Micheal Peck in 2013, who was the Senior Resident NRC Inspector at that time, states that the new seismic information shows that the fault lines are capable of generating earthquakes at magnitudes beyond what DCPP was designed to withstand.

<sup>2</sup> California ISO data on renewable curtailment can be found [here](#).

<sup>3</sup> Meaning the grid only fails one day every 10 years, or 2.4 hours per year.

2022 record peak equivalent event and a 2021 wildfire equivalent event at the same time.<sup>4</sup> It is not calculated exactly how probabilistic a scenario like that would be; however, it would be less likely than a 1-in-10 or 1-in-14 event.

Other worst case scenarios are not taken into account, such as a previously touched on earthquake-caused nuclear meltdown. This meltdown scenario would be far, far more catastrophic than rolling blackouts causing a percentage of Californians to lose power for a few hours. The probability of dangers like nuclear proliferation and environmental destruction are not mentioned in the report. An analysis comparing the probabilities and effects of nuclear catastrophes to the probabilities and effects of some power loss would be more helpful in deciding if DCPD should remain open longer. As the CEC's next report is on schedule to be published as a draft shortly, it is worrying that there will be more of the same post hoc justification to keep DCPD's life extended.

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<sup>4</sup> Neither the 2022 event or 2021 resulted in rotating outages, as contingency systems were successfully implemented.