

From: Kevin Kidd
To: Docket Optical System
Date: 10/29/2008 8:49 AM
Subject: Fwd: Brandt public comment to AB 1632 report

DOCKET

07-AB-1632

DATE OCT 29 2008

RECD. OCT 29 2008

Hi Dockets,

I received the letter below today from Mr. Brandt. Can you please docket it for him and send it to whom ever is in charge of that section.

Thanks,

Kevin Kidd

I am most concerned that my letter of 10/13/08 be seen and considered before the CEC sends its AB 1632 report to the legislature. The letter was sent in plenty of time before the AB 1632 workshop but apparently never made it..

Can you either send or tell me how to send my 10/13/08 letter to the appropriate people so it will be considered ?' I am appealing to you as the only helpful contact I have in the CEC. Thank you.

Frank Brandt
 San Jose, CA

10/13/08 Brandt letter .

The intent of part 8 of AB1632 was to have the CEC prepare a report to support the thesis of the legislature that large nuclear plants are subject to unplanned shutdowns that will have a catastrophic effect on the state's electric grid. Ostensibly this report was to justify the preparation of a state mandate that the two operating nuclear reactor plants in the state be shutdown permanently and also to add a another layer to the roadblocks that the state has erected against nuclear plants.

The draft version of the report does not support the AB1632 thesis. It is crucial that the CEC, despite its own anti nuclear bias, explicitly explains this fact to the legislature with an easily obtained and easily understood document. The legislature depends on the CEC for sound advice and this will be a great service to them and other interested parties. I suggest that the best way for the CEC to accomplish this is to say it in the cover letter that is sent with the report and also to say it in a revision of the report's abstract.

As I read it this is what the report says and is what should be reported to the legislature.

1. SONGS and Diablo Canyon plants are the same as any power plant, be it fossil, solar, nuclear or whatever energy source is used, are subject to unplanned shutdowns
2. An simultaneous unplanned shutdown of both of the subject plants can be tolerated by the state power grids . No catastrophic damage to the state's electric grid will occur.
3. Since they are low cost sources of clean energy long term shutdowns will have an adverse effect on rates and the environment.
- 4 The state should be cautious about opposing the re-licensing of these plants since failure to re-license them will lead to rate increases and more greenhouse gas production.

The basic problem with this report is that it is too long to be useful to either a legislative committee or an individual legislator. A legislator needs advice on what to do when the next legislative action on nuclear power is introduced I doubt that many legislators have the time or inclination to digest the main body of the document. If they look to the EXECUTIVE SUMMARY, it is also too long and difficult to decipher . If they look to the current abstract they will see that it has no useful information . The solution is to rewrite the abstract to tell what the report says.

Emphasizing what the report really states will not be appreciated by anti nuclear people but they have to face the facts. The report buries the facts with really unnecessary research on possible causes for unplanned shutdown and also mostly anti nuclear arguments that try reduce the impact of the facts. Why does it take 20 pages of the summary to say the obvious fact that nuclear power plants are subject to unplanned shutdowns but doesn't say these plants are more vulnerable than any other type. Only one page is used to say that the state grid can tolerate a large scale unplanned shutdown of the 2 nuclear plants which renders moot any worry about an unplanned shutdown. All the research on possible causes is a waste of time, effort and taxpayer money. One can interject here that the proposed alternates to nuclear such

as solar plants in addition to being subject to unplanned shutdowns when a cloud intervenes are shutdown every day when the sun sets. Wind plants are also subject to daily unplanned shutdowns when the wind stops.

If the CEC could only convince itself and the legislature that as soon as reliability enters the energy policy debate it becomes obvious that large scale nuclear plants which can produce clean, low cost reliable 24/7 electric power cannot be replaced by clean but unreliable solar and wind plants. One can only wish that the revelation will come soon.

Frank Brandt, a private citizen
San Jose, CA