

Docket Optical System - Comments on 2009 IEPR Draft -- DOCKET No. 09-IEP-1A

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Date: 10/28/2009 12:58 PM
Subject: Comments on 2009 IEPR Draft -- DOCKET No. 09-IEP-1A

TO: CALIFORNIA ENERGY COMMISSION
Dockets Office, MS-4
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FR: DAVID NELSON
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RE: Docket No. 09-IEP-1A
Comments on the 2009 Draft IEPR Regarding Once-Through Cooling
And Other Issues

DOCKET**09-IEP-1A**

DATE OCT 28 2009

RECD OCT 28 2009

GENERAL COMMENTS:

1. There is too much emphasis on electrical reliability. The environment is an equally important issue.

2. Draft reports on draft regulations are cited as though they're established final regulations. Take, for example, the July 2009 "Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling – Draft Substitute Environmental Document" prepared by State Water Resources Control Board and CA Environmental Protection Agency (hereafter "Draft Enviro. Document"). This is merely a proposed draft of a policy which is currently being reviewed, critiqued and, most likely, will be corrected and revised. No legal compliance schedule to phase out once-through cooling plants has been issued yet. The final policy may be very different than the draft now on the table. A draft cannot be treated as adopted in fact policy or regulation.

3. California still has a moratorium on new nuclear plants due to the waste problem. These old plants have no solutions for treatment or disposal of their hazardous, nuclear waste. Relicensing is an attempt to circumvent existing law prohibiting the building of new power plants for this very reason – there's no way to dispose of the waste.

COMMENTS SPECIFIC TO THE TEXT:

Pages 27-29: The IEPR states there are 21 coastal plants using OTC. However, according to the Draft Enviro. Document, there are only 19.

Pages 44-45: The IEPR states that three nuclear plants provide "14%" of the electricity supply. This is again asserted in pages 108-115. But according to the 2007 IEPR (see page 23), it's only 5%.

On page 104 under the heading, "Natural Gas Plants and the Environment," it states, "The pumping process impinges on fish, invertebrates, and crustaceans, and destroys

thousands of fish eggs and larvae.” The loss of fish larvae is in the billions, not thousands (see Table 2 on page 31 of the Draft Enviro. Document).

Pages 168 -172 under the heading, “Impacts of OTC Mitigation Policies”: It is not clear why the SWRCB has chosen wet cooling towers as the benchmark. Dry cooling could be as effective, if not better, than closed cycle wet cooling, and in fact, is used on many new plants already.

The issues listed on page 224 under the heading “Nuclear Plants and the Environment” should include the following subjects which are omitted:

A) The huge thermal impact (which is still unmitigated).

B) It should be noted that at the SWRCB’s Oct. 2009 hearing on the Draft Enviro. Document, there was disagreement from an engineering perspective as to the "feasibility" of using cooling towers (dry or wet) at Diablo. An electrical engineering expert asserted it was feasible.

We request that the draft 2009 IEPR be re-reviewed and these comments considered and incorporated in the next draft. Thank you. END