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From: Doug&Patty <ruppner@yahoo.com>
To: <docket@energy.state.ca.us>
Date: 7/27/2011 5:03 AM
Subject: Comment for docket No. 11-IEP-1J

Dear Commissioners:

As concerned California ratepayers and residents, and in consideration of the many issues raised by our state's reliance on nuclear power in a post-Fukushima world, the following recommendations posed by the Alliance for Nuclear Responsibility should be adopted in the 2011 IEPR proceeding:

1) The CEC should recommend that SCE and PG&E undertake immediate studies to determine how they would replace 4400 MW of baseload generation in the short and long term should their nuclear plants be rendered unusable by a seismic event or other natural disaster as well a potential shutdown due to acts of malice or terror should the "unthinkable" become a reality on the our side of the Pacific Rim.

2) The CEC should recommend that the U.S. Department of Energy's Blue Ribbon Commission come to California to explain why our state should risk another 20 years of radioactive waste production on seismically active coastal zones. As the NRC has promulgated a waste confidence ruling increasing the allowable on-site storage of waste for as long as 60 and possibly 100 years after shutdown, questions of responsibility for overseeing the waste and ongoing storage costs need to be evaluated. There is no assurance that fiscal burdens would not leave the state responsible for this unfunded federal mandate.

3) The CEC should recommend that the federal government review liability limits under Price-Anderson ($12.6 billion) in light of damage estimates that exceed $100 billion in Japan. As a state, how would California residents, property owners and businesses be "made whole again" after a nuclear accident in light of the gap between coverage and damages?

4) The CEC should recommend that the 1967 Certificate of Public Convenience and Necessity (CPCN) issued for Diablo Canyon be reviewed and updated in light of new evidence on population, seismic vulnerabilities, absence of a permanent offsite solution to safe storage of highly radioactive waste.

5) The CEC should recommend an updating and analysis of the costs associated with increasing the emergency planning and evacuation zones from 20 to 50 miles and beyond in the wake of the NRC's own recommendation that residents voluntarily evacuate a similar sized area around Fukushima.

Thank you for your consideration,

Patricia Ruppelt
Alameda, CA