

California Energy Commission

Dockets Office, MS-4

Re: Docket No. 11-IEP-1J (California Nuclear Power Plant Issues)

1516 Ninth Street

Sacramento, CA 95814-5512

August 2, 2011

Friends of the Earth would like to thank the Energy Commission for convening its hearing on the implications of the continuing nuclear disaster at Fukushima for the future of California's own energy policy. We believe that this terrible disaster does call into question the safety at both Diablo Canyon and San Onofre. Like the reactors at Fukushima, Diablo Canyon and San Onofre are decades old, in seismically active areas, sit directly on the coast where they are at risk from tsunamis and put at risk millions of people who live within the potential evacuation zones that would occur during a serious nuclear accident. In addition, given that recent estimates suggest that the cost of the Fukushima disaster is already in excess of \$235 Billion, it is clear that the Commission urgently needs to assess the financial protections guaranteed to Californians given that they could face a multi hundred billion dollar nuclear accident akin to that at Fukushima.

On behalf of our more than ten thousand activists and members, we would like to submit the following comments/recommendations for docket No. 11-IEP-1J and ask that the Energy Commission make the following recommendations as part of its Integrated Energy Policy Report (IEPR) for 2011:

- 1) The Commission should call for the appropriate government agencies and utilities to undertake immediate studies to determine how they would replace the 4400 MW of baseload generation in the short term if the nuclear plants were rendered unusable by a seismic event or other natural disaster or due to acts of malice or terror, and in the longer-term how this baseload generation will be replaced by 2025 when the last of the reactors will have reached the end of its licensed, design lifetime. This later study should assess and assure that the nuclear generated electricity will be replaced by energy efficiency and new renewable energy sources.
- 2) The Commission should recommend that the federal government review liability limits under the Federal Price-Anderson Act in light of the Japanese damage estimates that exceed \$230 billion. In parallel, the Commission should undertake its own study about how California residents would be effected by the Price Anderson liability cap of some \$12 Billion—how would CA property owners and businesses be “made whole again” after a nuclear accident in light of the gap between the inadequate coverage assured by the US government and the stark reality of the hundreds of billions of dollars of damages that would be created by a Fukushima level nuclear disaster in the state?
- 3) The Commission should recommend that the original Certificate of Public Convenience and Necessity (CPCN) issued for Diablo Canyon and San Onofre be reviewed in light of new evidence on population, seismic vulnerabilities, and the absence of a permanent offsite solution to safe storage of highly radioactive waste.



4) The Commission 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.

We thank you in advance for considering our recommendations. Should Commissioners or Commission staff wish to discuss these issues with us, please do not hesitate to contact me at the address below.

Sincerely,

(original signed by Damon Moglen)

Damon Moglen

Director, Climate and Energy Program

Friends of the Earth

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