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Subject: Docket # 11-IEP-1J Calif. Nuclear Power Plant Issues

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DOCKET

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3520 Overland Ave. # A 149

Los Angeles, CA 90034

California Energy Commission

Dockets Office, MS-4

Re: Docket No. 11-IEP-1J

1516 Ninth Street

Sacramento, CA 95814-5512

Dear Ms. Byron, Ms. Green, and to whom it may concern at the California Energy Commission and beyond:

First, I wish to make the contention that seismic issues being studied in relation to Diablo Canyon over thirty years ago have never been resolved. That is, the seismic hearings held in San Luis Obispo in late summer or early fall 1980 were prompted by the 10-15-79 Imperial Valley earthquake which indicated a "seismic focusing" effect as well as showed an unexpected level of ground acceleration -- both vertical ground acceleration and horizontal ground acceleration.

Yes, I know that the NRC's Atomic Safety and Licensing Appeals Board declared the Diablo Canyon nuclear power facility to be seismically safe, but I also know (besides the inherent bias of the NRC as indicated by the term "Atomic Safety and Licensing Board" since they clearly care more about the licensing part than the safety part) that Chairman Salzman ruled that Diablo was seismically safe shortly after he was appointed to a federal judgeship by President Reagan.

I also pointed out in a hearing not long ago in San Luis Obispo that when Diablo got its low-power license, it was during the time where 105 employees

had given sworn testimony about 3000 problems with the facility. A response I got was that all those were taken care of before the facility was fired up. However, seeing that the revelation about switched blueprints for seismic reinforcements in the auxiliary cooling system in September 1981 was primarily responsible for prompting over two and half more years of work at Diablo before the low-power license was issued, I highly doubt not only that the NRC cared about anything but profit for utilities and the industry, but that they actually addressed the problems reported to the Government Accountability Project by Diablo Canyon workers. Show me paperwork proof that these 3000 problems were addressed at Diablo Canyon..

I unfortunately could not make the Sacramento hearing on July 26th, but I just completed reading all the pdfs presented that day and will now make some comments on those.

Now to begin with some remarks by Barbara Byron of the CEC. She acknowledges uncertainties about seismic and tsunami risks at Diablo and San Onofre, and sees implications for Diablo and San Onofre from the Fukushima Daiichi nuclear accident disaster. She notes that the Blakeslee bill AB 1632 directed the CEC to "Assess the potential vulnerability of large baseload plant (Diablo Canyon and San Onofre) to a major disruption from a seismic event or plant aging." It also called for adoption of the AB 1632-related report to be integrated into the Integrated Energy Policy Report, plus called for the performing of subsequent seismic updates as new information and understanding emerge.

I would hope that the quote from the earlier paragraph can apply BOTH to large-scale seismic disruption as well as how an aging facility would hold up under the additional stress of considerable horizontal and vertical ground acceleration. For example, how have the alterations at Diablo and San Onofre relating to replacing steam generators impacted safety concerns at such facilities in case of a sizable earthquake or even a shallow more moderate quake which could disrupt the cooling of the reactor core or spent fuel storage areas, etc.

I note that Ms. Byron on page 10 of 21 says that "The Shoreline Fault's major characteristics are largely unknown, e.g., its length, proximity to the plant, and relationship to the Hosgri Fault." Yet, of course, PG&E assures us that the plant can withstand whatever seismic punch the Shoreline Fault can deliver -- despite so many uncertainties mentioned by the CEC and others.

At least PG&E at Diablo are doing certain seismic investigations -- of course with the unmentioned proviso that whatever they find, they will conclude that Diablo is seismically safe. This conclusion would only be changed if PG&E shareholders could make more money by shutting down the

facility -- in which case all sorts of seismic and other safety matters would come to the fore resulting in immediate shutdown. I want to point out the last two bullet points on page 11 of 21 which say "Data that has become available since SONGS was built has indicated that the site could experience larger and more frequent earthquakes than was originally anticipated when plant designed." And recent studies have also shown more generic as well as site-specific uncertainties regarding impact of ground motion near a fault -- "Recent studies indicate ground motion near a fault could be stronger and more variable than previously thought."

Page 12 of 21 points out major uncertainties related to San Onofre due to the quake potential of a nearby offshore fault zone (the South Coast Offshore Fault Zone) as well the fault that connects the faults in the San Diego and Los Angeles regions -- I'm not sure why one seems to be hiding the name of the Newport-Inglewood Fault which has been an acknowledged major fault since the 1933 quake in Long Beach along that fault.

Another AB 1632 report finding was that "Spent fuel pools at Diablo Canyon and SONGS have been "re-racked" to increase storage capacity by placing spent fuel assemblies closer." And, "Loss-of-coolant event from an earthquake or a terrorist attack in a re-racked pool could cause radiation releases and contamination."

Examining page 14 of 21, the first point is insufficient to assure public safety in a timely manner, and the second point was ignored by greedy investor-owned utilities. Certainly making AB 1632-related studies available is quite reasonable, but to only seem to offer such info to the CPUC and the NRC for the license renewal process is essentially putting out heads in the sand until the years 2024 and 2025 which is an absolute outrage!! Actually, I guess I am uncertain about whether the CPUC approved of SCE and PG&E submitting license renewal applications to the NRC, but I suspect they did not. If I am incorrect, then that agency needs more of a shake-up than even I realized.

In regards to the CA Coastal Commission (mentioned on page 15 of 21), it is unclear what timing the CCC had in mind in regards to PG&E's application for a coastal development permit, but in regards to the CCC's federal consistency renewal review for Diablo's license renewal and review, it seems to not care about what happens at the nuclear power facilities until 2024 or 2025. Why emphasize theoretical future scenarios when a tragic scenario could happen at any time?

Since lawyers call the shots, clearly PG&E cannot conclude (unless financial incentives change dramatically) that Diablo Canyon is not seismically safe, and in this context I find it very disturbing that taxpayers paid \$16.7 million for an internal seismic review. I see

political influence on at least some of the allegedly independent panel reviewing the clearly biased PG&E study.

And now, at long last, SCE has stopped dragging their feet and have applied for funds from the CPUC (via the taxpayers) to do their own biased seismic study of the faults and quake potential around the San Onofre reactors.

The first summary point in Ms. Byron's presentation mentioned historic seismic concerns with PG&E's Humboldt Bay nuclear power facility which was shut down in 1976. Since there is still potential for a serious accident in that area due to an earthquake, a quake and tsunami, or otherwise, what specifically is being done to address safety concerns in the Humboldt Bay area?

The second sentence under the last bullet point under Ms. Byron's "Summary" mentions that AB 1632 recommendations "including reassessing the adequacy of emergency plans and addressing spent fuel pool concerns" should be implemented by PG&E and SCE. Is there any timetable or enforcement if they drag their feet in regards to such?

Plus, as page 13 of 21 points out at the bottom, "Spent fuel pools should be returned to open racking arrangements as soon as feasible." Is there a time frame for such, or any teeth in this IEPR recommendation of 2008?

In the 2nd presentation, Mr. Ellsworth presents pdf pages by Jeanne Hardebeck which helps clarify some things about the Shoreline Fault near Diablo Canyon. Unlike PG&E's claims that they are segmented, yet the last bullet point on page 18 of 25 says that, "Northwest end of Shoreline Fault extends to the mapped trace of the Hosgri Fault, indicating that there is no gap between these faults at seismogenic depths."

Page 20 of 25 of that presentation admits that, "We lack critical information about these offshore thrust faults that compromises our ability to assess the hazards that they pose." Other uncertainties are also mentioned on that page.

Furthermore, it is admitted that there are "Epistemic uncertainty at short periods" regarding ground motions.

Page 12 of 25 shows a map. I have seen maps for decades showing the major Mendocino and Murray Fracture Zones meeting the California coast. Yet, while there is coloration for the Mendocino Fracture Zone, there seems to none for the Murray Fracture Zone. Due to the 7.3 to 7.5 quake which struck the southern Hosgri Fault Zone on 11-4-1927, I find this lack of acknowledgement of the major east-west fault zone in the area rather mysterious.

Why is Ellsworth presenting part of a 2006 National Research Council conclusion that the designs for nuclear facilities are too conservative? Will this help him get hired for his next project? Either give a hell of a lot of evidence, or omit this industry-inspired babble!

I note that page 23 of 23 shows many research needs to better understand seismic activity along the California Coast -- says the Working Group on California Earthquake Preparedness.

I note three places on the map on page 14 of 23 that indicates that there are three places (besides by the San Andreas Fault approximately 40 miles to the east) in San Luis Obispo County which is colored orange indicating potential for severe shaking. One of these areas is north of Cambria, another is a little inland splotch around San Luis Obispo, while the third is immediately offshore of Diablo Canyon. Also, page 8 of 23 indicates that there are the most magnitude 4 plus quakes in SLO County in the area near Diablo Canyon and Montana de Oro State Park.

I object to the conclusion on page 2 of 21 of Mark Johnsson's report that "A nuclear emergency such as is occurring in Japan is extremely unlikely at the state's two operating nuclear power plants. While this is certainly true as far as number of reactors at a site (there are less in California as compared to Fukushima Daiichi), and is likely the case as far as magnitude and likelihood of related tsunami, but do not draw the conclusion that a nuclear emergency is extremely unlikely -- or else please resign!

Though perhaps magnitude assessments have changed more recently, but I heard for many years that the southern Hosgri Fault Zone had a 7.3 to 7.5 quake on 11-4-1927, so clearly it is illogical to conclude that a fault zone which has already had at least a large quake is now limited to a 7.2 quake. Get as independent info as you can rather than relying on industry stooges, thank you!

Though I did not see this mentioned in the materials. but what about the "splay" which had been considered related to the Hosgri Fault in the

vicinity of Diablo's reactors?? Is this still considered Hosgri, or could it be related to the Shoreline, possibly the Los Osos Fault, or two or three of these??

I see a lot more power in state agencies than you are exercising regarding these poisonous threats along the California coastline. Do not simply await license renewal to gather and submit important information. Thank you for considering these comments.

Sincerely yours,

Bruce Campbell

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