Pacific Gas and Electric Company®

Barry S. Allen
Site Vice President

Diablo Canyon Power Plant
Mail Code 104/6
P. O. Box 56
Avila Beach, CA 93424

805.545.4888
Internal: 691.4888
Fax: 805.545.6445

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PG&E Letter DCL-13-045

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Power Plant, Units 1 and 2
2012 Annual Nonradiological Environmental Operating Report

Dear Commissioners and Staff:

Enclosed is the 2012 Annual Nonradiological Environmental Operating Report for Diablo Canyon Power Plant, Units 1 and 2, submitted in accordance with Subsection 5.4.1 of the Environmental Protection Plan, Appendix B, of the Facility Operating Licenses DPR-80 and DPR-82.

There are no new or revised regulatory commitments in this report (as defined by NEI 99-04).

Sincerely,

Barry S. Allen

J8I3/4486/64072666
Enclosure
cc/enc: Kenneth A Harris Jr., Interim Executive Officer, CRWQCB
Thomas R. Hipschman, NRC Senior Resident Inspector
Arthur T. Howell, III, Regional Administrator, NRC Region IV
James T. Policikoski, NRR Project Manager
Diablo Distribution

Enclosure
PG&E Letter DCL-13-045

2012 ANNUAL NONRADIOLOGICAL ENVIRONMENTAL OPERATING REPORT DIABLO CANYON POWER PLANT, UNITS 1 AND 2

Pacific Gas & Electric Company
April 2013

1. Introduction

Pacific Gas & Electric Company (PG&E) has prepared the 2012 Annual Nonradiological Environmental Operating Report in accordance with the Environmental Protection Plan (EPP), Appendix B, of Facility Operating Licenses DPR-80 and DPR-82 for Diablo Canyon Power Plant (DCPP), Units 1 and 2. The report describes implementation of the EPP per the routine reporting requirements of EPP Subsection 5.4.1. PG&E remains committed to minimizing the environmental impact of operating DCPP.

2. Environmental Monitoring

2.1. Aquatic Issues

Aquatic issues are addressed by the effluent limitations and receiving water monitoring/reporting requirements contained in the DCPP National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit includes applicable requirements of the California State Water Resources Control Board's Ocean Plan and Thermal Plan.

2.1.1. Routine Influent and Effluent Monitoring

During 2012, DCPP submitted quarterly NPDES reports containing routine influent and effluent monitoring data and permit compliance summaries to the Central Coast Regional Water Quality Control Board (CCRWQCB). The reports were submitted electronically during the month following the end of each quarter via the California Integrated Water Quality System (CIWQS), an internet database application. DCPP also submitted an annual NPDES report for 2012 to the CCRWQCB in February 2013 via the CIWQS application. The annual report contained monitoring data summaries in tabular and graphical format, and a summary of permit compliance and corrective actions for 2012. Copies of the quarterly and annual reports were submitted concurrently in hardcopy format to the Nuclear Regulatory Commission (NRC).

2.1.2. Receiving Water Monitoring Program

The NPDES Receiving Water Monitoring Program, required by the CCRWQCB, included the ecological monitoring, temperature measurements, and State Mussel Watch activities.

Environmental monitoring programs have recorded biological changes in the discharge area since plant start-up. These programs monitor intertidal and subtidal communities of invertebrates, algae, and fish in the discharge cove and at stations north and south of DCPP. During 2012, environmental monitoring continued under the revised Receiving Water Monitoring Program (RWMP). The revised

RWMP continued historical monitoring tasks, including temperature monitoring, State Mussel Watch activities, and intertidal and subtidal surveys (with additional stations and increased sampling frequencies).

The NPDES permit remains under administrative extension. In 2000, DCPP reached a tentative agreement with CCRWQCB staff, which addresses current and future impacts on receiving waters from power plant effluent discharge. This agreement, and the revised NPDES permit renewal application, did not receive the expected approvals from the CCRWQCB in July 2003, and periodic discussions are continuing with CCRWQCB staff and their consultants. Based on the tentative agreement, future receiving water monitoring requirements will be significantly reduced or eliminated upon approval of the revised NPDES permit. Effluent monitoring would continue under the revised NPDES permit.

DCPP submitted PG&E Letter No. DCL-2012-519, "Receiving Water Monitoring Program – 2011 Annual Report," to the CCRWQCB and the NRC on April 27, 2012. The 2012 RWMP Annual Report will be submitted at the end of April 2013.

2.1.3. Thermal Effects Study

DCPP submitted the final thermal effects comprehensive assessment report to the CCRWQCB and the NRC in 1998.

2.1.4. 316(b) Studies

DCPP submitted the final 316(b) report, entitled "316(b) Demonstration Report," (PG&E Letter No. DCL-2000-514), to the CCRWQCB and the NRC on March 1, 2000.

2.2. Terrestrial Issues

2.2.1. Herbicide Application and Erosion Control

Herbicides are used as one component of an overall land vegetation management program that includes transmission line corridors and rights-of-way. The company continues to use only Environmental Protection Agency and/or state-approved herbicides, and applies them in accordance with all applicable regulations.

PG&E continues to implement erosion control activities at the plant site and in the transmission line corridors as part of an overall land management program. These erosion control activities consist of routine maintenance and prevention efforts performed periodically

on an as-needed basis, including seasonal storm and wildfire damage repair.

2.2.2. Preservation of Archaeological Resources

A. CA-SLO-2 Site Management

Archaeological site CA-SLO-2 is managed in compliance with the Archaeological Resource Management Plan (ARMP) and Operating Procedure EV1.ID2. All projects undertaken within site CA-SLO-2, or immediately adjacent, are reviewed to determine whether archaeological deposits associated with the site are present and, if so, an impact assessment is completed. PG&E invokes the notification, monitoring, and mitigation procedures identified in the ARMP if a project-related impact is identified.

Archaeological examination and monitoring of site CA-SLO-2 was undertaken on two separate occasions in 2012.

During the summer and fall of 2012, PG&E conducted studies related to the Onshore Seismic Imaging Project (OSIP) within and adjacent to CA-SLO-2. The project was undertaken to enhance knowledge of fault structures in proximity to the DCPP. The OSIP was designed to avoid impacts to cultural resources, as well as avoid adverse impacts to any other aspects of environmental quality at the location.

In compliance with Section 4.2.2 of the DCPP EPP, PG&E reported the planned work (associated with OSIP) within CA-SLO-2 to the NRC in PG&E Letter DCL-12-080, "Nonroutine Report of Planned Disturbance of Archaeological Site SLO-2," dated August 21, 2012. The notification was deemed necessary since the seismic studies within the site are inconsistent with the allowable use of CA-SLO-2 specified under Section 4.1 of the ARMP.

The work within CA-SLO-2 involved deploying series of geophone nodes across the site, striking a 10-inch steel disk with a sledgehammer at regular intervals along several transects within the site (within areas covered with fill material), and driving an EnviroVibe MiniBuggy sound source on the existing paved roads that bisect the site. At PG&E's request, a consulting resource, Applied EarthWorks, Inc. (Æ), developed and implemented a series of procedures to ensure archeological resource impact avoidance during installation and operation of seismic survey equipment within and near CA-SLO-2. The consultant's observations were documented in a letter report that concluded the protection measures developed for the OSIP study were effective, and site CA-SLO-2 was not adversely impacted (Haydu 2012). Additionally,

the annual photo-monitoring of CA-SLO-2 was conducted in October 2012, by PG&E Senior Cultural Resource Specialist, Mike Taggart, RPA.

The overall condition of site CA-SLO-2 is stable, with the exception of two areas on the western and southwestern margins of the site that are subject to natural erosion of the marine terrace. No significant changes were observed since the last monitoring event was completed in 2011. The barriers in place along the established road ways have proven effective in keeping vehicular traffic off of sensitive portions of the site, and restricting traffic to previously disturbed areas. Dense vegetation that covers much of the site has stabilized loose soil, limiting erosion and obscuring surface artifacts. Localized erosion along Diablo Creek Road was addressed through revegetation in the winter of 2011; reapplication of the revegetation measures may be necessary during 2013. The gradual loss of deposits along portions of the marine terrace subject to natural erosion is being monitored, and opportunistic collection of materials eroding from this area will be undertaken to salvage datable material and diagnostic artifacts as necessary.

B. Chumash Indian Correspondence

Over the course of 2012, PG&E and the company's consultant Æ corresponded, and met directly with, representatives of the local Chumash community on several occasions in order to discuss cultural resources management at DCPP. In general, contact was initiated by PG&E Cultural Resources Specialists to notify Native American contacts of planned work associated with the OSIP, and the Central California Coastal Seismic Imaging Project (also known as the Offshore Seismic Project).

PG&E and Æ began outreach to the local Native American community by contacting individuals and organizations that have typically expressed interest in projects in San Luis Obispo County. Based on concerns regarding cultural resources expressed at a California State Lands Commission (SLC) public hearing held on August 14, 2012 (related to the seismic project), Mike Taggart (PG&E) and Fred Collins (Tribal Administrator for the Northern Chumash Tribal Council) subsequently met on August 17, 2012, exchanged emails on several occasions, and stayed in contact via telephone. Mike Taggart also reached out to Crystal Baker, member of the Coastal Band of the Chumash Nation, who voiced concerns at the August 14, 2012, SLC hearing. The National Science Foundation additionally facilitated several conference calls regarding the seismic project with local Native Americans, which PG&E participated in, concerning archaeological resources at DCPP.

PG&E also met and corresponded with Fred Collins on several occasions during 2012 to discuss management of site CA-SLO-2 generally, and other DCPP projects. Associated meeting notes and email correspondence are maintained by PG&E Utility Cultural Resources.

3. Unusual or Important Environmental Events

There were no unusual or important environmental events during 2012.

4. Plant Reporting Requirements

4.1. EPP Noncompliance

There were no EPP noncompliances during 2012.

4.2. Changes In Station Design

There were no changes in plant design, operation, tests, or experiments that involved an unreviewed environmental question or a change to the EPP.

4.3. Nonroutine Reports

There were no nonroutine events during 2012 per the EPP, and therefore no nonroutine reports were submitted to the NRC.