



**Pacific Gas and  
Electric Company®**

**James M. Welsch**  
Site Vice President

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

805.545.3242  
Internal: 691.3242  
Fax: 805.545.4884

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PG&E Letter DCL-15-056

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  
2014 Annual Nonradiological Environmental Operating Report

Dear Commissioners and Staff:

Enclosed is the 2014 Annual Nonradiological Environmental Operating Report for Diablo Canyon Power Plant, Units 1 and 2, submitted in accordance with Facility Operating Licenses DPR-80 and DPR-82, Appendix B, "Environmental Protection Plan," Subsection 5.4.1.

PG&E makes no regulatory commitments (as defined by NEI 99-04) in this letter. This letter includes no revisions to existing regulatory commitments.

Sincerely,

James M. Welsch

bnsn/4540/64105148

Enclosure

cc: Diablo Distribution  
cc/enc: Marc L. Dapas, NRC Region IV Administrator  
Kenneth A Harris Jr., Executive Officer, CCRWQCB  
Thomas R. Hipschman, NRC Senior Resident Inspector  
Siva P. Lingam, NRR Project Manager

**2014 ANNUAL NONRADIOLOGICAL ENVIRONMENTAL  
OPERATING REPORT  
DIABLO CANYON POWER PLANT, UNITS 1 AND 2**

Pacific Gas & Electric Company  
April 2015

## **1. Introduction**

Pacific Gas and Electric Company (PG&E) has prepared the 2014 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 respectively. 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 2014, 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 2014 to the CCRWQCB in February 2015 via the CIWQS application. The annual report contained monitoring data summaries in tabular and graphical form, and a summary of permit compliance and corrective actions, as applicable, for 2014. 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 2014, 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, DCPD reached a tentative agreement with CCRWQCB staff, which addressed current and future impacts on receiving waters from ongoing power plant cooling water discharge. This agreement, and the associated NPDES permit renewal application, did not receive the expected approvals from the CCRWQCB in July 2003. Currently, final resolution of outstanding issues related to receiving water impacts, as well as NPDES permit renewal, remain pending. Based on the tentative agreement, future receiving water monitoring requirements will be significantly reduced or potentially eliminated upon approval of a renewed NPDES permit. Power plant wastewater discharge effluent monitoring would continue under a revised NPDES permit.

DCPD submitted PG&E Letter No. DCL-2014-519, "Receiving Water Monitoring Program – 2013 Annual Report," to the CCRWQCB and the NRC on April 29, 2014. The 2014 Receiving Water Monitoring Annual Report will be submitted at the end of April 2015.

#### 2.1.3. Thermal Effects Study

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

#### 2.1.4. 316(b) Studies

DCPD submitted PG&E Letter No. DCL-2000-514, "316(b) Demonstration Report," the final 316 (b) report, 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 Diablo Canyon Power Plant Interdepartmental Administrative Procedure EV1.ID2. All projects undertaken within the CA-SLO-2 site, 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 would invoke the notification, monitoring, and mitigation procedures identified in the ARMP if a project-related impact is identified.

The annual photo-monitoring of CA-SLO-2 was completed on November 19, 2014, by PG&E's Sr. Cultural Resource Specialist.

The overall condition of site CA-SLO-2 is stable, with the exception of areas on the western and southwestern margins of the site that are subject to natural erosion of the marine terrace. In addition, erosion of the steep road cut on the eastern margin of the site continues despite area soil stabilization and revegetation work completed in late 2011. Nonetheless, no significant changes were observed since completion of the prior monitoring event conducted in December 2013. Barriers in place along the established roadways within the archeological site have proven effective in keeping vehicular traffic off of sensitive portions of the site, and restricting traffic to previously disturbed areas. Signage around site CA-SLO-2, instructing all site personnel or visitors to contact DCPM Management prior to entering the controlled site boundary, remain in place and are in good condition.

Dense vegetation that covers much of the site has stabilized loose soil, limiting erosion and obscuring surface artifacts. Localized erosion along Diablo Creek Road will be addressed through additional revegetation measures during the spring of 2015 if enough moisture is forecast to sustain new plantings. The gradual loss of deposits along portions of the marine terrace subject to natural erosion is continuing to be monitored. Opportunistic collection of materials eroding from this location may be undertaken to salvage datable material and diagnostic artifacts as necessary or prudent.

### B. Northern Chumash Correspondence

Over the course of 2014, PG&E corresponded with representatives of the local Northern Chumash community in connection with a facility



high-voltage transmission substation upgrade project currently under consideration. Contact was initiated by PG&E's Sr. Cultural Resources Specialist to notify Native American contacts of the proposed upgrades to the DCPD 230 kV switchyard, and to solicit information or concerns the contacts may have with the proposed work. The Native American Heritage Commission provided a list of 24 Native American contacts that may have knowledge of, or interest in, cultural resources in the vicinity of the proposed project. Hard copy letters were followed by email or telephone communications. Two responses were received, neither of which presented information that indicate that the project would impact known resources in the vicinity. Correspondence and a consultation log related to the contacts are maintained for reference by PG&E's Cultural Resources Section.

### **3. Unusual or Important Environmental Events**

There were no unusual or important environmental events during 2014.

### **4. Plant Reporting Requirements**

#### **4.1. EPP Noncompliance**

There were no EPP noncompliances during 2014.

#### **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 2014 per the EPP, and therefore no nonroutine reports were submitted to the NRC.