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Notice of Receipt and Availability of Application for Renewal of Diablo Canyon Nuclear Power Plant License

Comment On: NRC-2009-0552-0026

Diablo Canyon Power Plant, Units 1 and 2; Notice of Intent to Prepare an Environmental Impact Statement

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General Comment

Two key issues to address in the NRCs EIS on extension of Diablo Canyons Nuclear Power Plants licenses

- 1) destruction of local marine habitat from once-through cooling; and
- 2) developing technology for inspecting, repairing, and replacing Holtec dry storage canisters

For years, PG&E provided state water authorities with skewed data showing that its Diablo Canyon nuclear power stations daily intake of billions of gallons of water did very little harm to surrounding marine life. However, in the spring of 2000, Diablo Canyon's operators were discovered to have withheld information from environmental regulators for two decades revealing the true effect of the reactors hot water discharges into the coastal waters off Diablo Cove and miles beyond: more extensive thermal plume impact zones than previously admitted and the progressive deterioration of biologically important marine habitat in coastal waters around the reactor. The damage was catastrophic to the indigenous marine life community. These findings had never been reported to state or federal agencies.

State water authorities viewed the escalating damage as sufficiently severe to press for a cease and desist order against the utility's previously accepted levels of waste heat discharges. Despite documented evidence to the contrary, PG&E argued that no mitigation action was needed. PG&E forced the authorities to back down by threatening to outspend environmental regulators in legal appeals.

How can the public and governmental agencies trust a company displaying such duplicity? Further, the

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intimidation used was in effect blackmail.

PG&E should have been held fully accountable, and in the future be prosecuted to the full extent of the law, if necessary, for all violations.

Safe storage of nuclear waste is the issue of greatest environmental concern at Diablo Canyon. Nuclear waste produces about 5% highly radioactive fission products like cesium, strontium and iodine, making it millions of times more radioactive than fresh uranium fuel. Unshielded, it delivers a lethal dose in seconds and remains a hazard for at least 12,000 human generations. High-level waste is stored outside of containment in pools for at least 5 years, and then transferred to dry container casks.

The U.S. nuclear industry could have chosen thick CASTOR cast iron casks, with a thickness of 14 to 20, such as those used in Germany. Instead, lower-quality stainless steel canisters with a thickness of 1/2 to 5/8 were selected, putting profit over safety. None of the current U.S. thin steel storage canisters are adequately designed for over 20 year storage; can fail 16 years after a crack initiates; and may start failing in as little as 17 to 20 years with through-wall cracks. A throughwall crack can release millions of curies of radiation into the atmosphere, according to the President of Holtec.

In a marine environments stress corrosion cracking could cause the stainless steel dry storage canisters to crack within 30 years. And there is no current technology to inspect or repair these canisters for cracks, and no current method to replace these canisters.

A 2014 inspection found sea salt crystals on a Diablo Canyon Holtec canister that had only been loaded for only two years. The canister had sea salts and a low enough temperature range to trigger the corrosive environment needed for stress corrosion cracking initiation.

The public has been deceived by P&E. Reports of quality control issues from Holtec employees and NRC employees bring into question how reliable these casks will be over time. Each thin-shelled canister has 20-30 tons of nuclear waste the radioactive equivalent of up to 500 Hiroshima bombs. Permanent local storage of nuclear waste in these casks poses unthinkable hazards.

On a bus tour of the power plant in October 2013, I sat next to a senior member of the Diablo Canyon Independent Safety Committee, who is a leading international expert on safety and probabilistic risk assessment of operating reactors. As our bus came within view of the Plants ghoulish dry cask cemetery for the living dead, he turned to me and said:

We cant build any more nuclear power plants until we know what to do with the waste.

His directness and honesty were in stark contrast to the PR speak Id heard all morning.

Now Im of the opinion that not building new plants isnt enough; we must immediately stop producing more nuclear waste.

The lessons learned from the shutdown of San Onofre will be helpful in taking this critical step.

Submitted to the NRC in San Luis Obispo, CA, on August 5, 2015

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