



ALLIANCE FOR NUCLEAR RESPONSIBILITY

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August 24, 2015

Nicholas DiFrancesco  
Office of Nuclear Reactor Regulation  
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**transmitted via email**

Re: NUCLEAR REGULATORY COMMISSION PLAN FOR THE AUDIT OF PACIFIC  
GAS AND ELECTRIC COMPANY'S SEISMIC HAZARD AND SCREENING  
REPORT SUBMITTAL RELATED TO THE NEAR-TERM TASK FORCE  
RECOMMENDATION 2.1 - SEISMIC FOR: DIABLO CANYON POWER PLANT,  
UNIT NOS. 1 AND 2 (TAC NOS. MF5275 AND MF5276)

Dear Mr. DiFrancesco:

I write to supplement my letter to you of May 12, 2015 regarding the Category 1 meeting NRC staff held with PG&E seismic personnel on April 28, 2015. I am attaching the Direct Testimony that the Alliance for Nuclear Responsibility submitted to the California Public Utilities Commission on July 14, 2015 and the Supplemental Testimony it submitted on August 21, 2015.

I specifically call your attention to PG&E's deterministic analyses of joint ruptures on the following linked faults: (1) Hosgri linked to faults up to Mendocino Triple Junction; (2) Los Osos linked to Hosgri; (3) San Luis Bay linked to Hosgri; and (4) Shoreline linked to Hosgri, which is described on pages 42 – 44 of the July 14 testimony of John Geesman. The shortcomings of PG&E's analytical approach – especially the degree to which “*magnitude saturation*” in peak ground acceleration encourages PG&E to limit its concerns to earthquakes of M6.5 or below – is discussed at pages 2 – 6 of the August 21 testimony, with particular emphasis on concerns Dr. Thomas Heaton of CalTech has expressed about long-period ground motions.

The NRC staff's recent reaffirmation that the Diablo Canyon relicensing environmental assessment will not consider seismic issues (“Fed environmental review of Diablo Canyon won't

study earthquakes,” *San Francisco Chronicle*, August 15, 2015) magnifies the significance of your review. Thoroughness requires your careful assessment of the concerns raised by the materials I have attached.

Sincerely,  
/s/ Rochelle Becker  
Executive Director

NOTE: due to the potential limitations on attachment size acceptance by NRC email inboxes, this letter is being sent in three parts, with one attachment on each part, all under the same subject line, *NRC plan for audit of PG&E seismic hazard and screening report*. Should these attachments be rejected by the NRC mailboxes, you may download them from this web page:

<http://a4nr.org/?p=3476>

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Attachments:

- 1) A.15-02-023 Prepared Testimony of John Geesman
- 2) A.15-02-023 Prepared Testimony of Sam Blakeslee
- 3) A.15-02-023 Supplemental Testimony of John Geesman,