



**Pacific Gas and  
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PG&E Letter DCL-16-055

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  
2015 Annual Non-radiological Environmental Operating Report

Dear Commissioners and Staff:

Enclosed is the 2015 Annual Non-radiological 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.

Pacific Gas and Electric Company makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

Sincerely,



FOR JAMES M. WELSCH

James M. Welsch

Enclosure

cc/enc: Marc L. Dapas, NRC Region IV Administrator  
John M. Robertson, Executive Officer CRWQCB Central Coast Region  
John P. Reynoso, NRC Acting Senior Resident Inspector  
Balwant K. Singal, NRR Senior Project Manager  
Diablo Distribution

**2015 ANNUAL NON-RADIOLOGICAL ENVIRONMENTAL  
OPERATING REPORT  
DIABLO CANYON POWER PLANT, UNITS 1 AND 2**

Pacific Gas & Electric Company  
April 2016

## **1. Introduction**

Pacific Gas and Electric (PG&E) has prepared the 2015 Annual Non-radiological 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 2015, 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 2015 to the CCRWQCB in February 2016 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 2015. 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 (RWMP), 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 2015, environmental monitoring continued under the revised 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.

PG&E Letter No. DCL-2015-523, "PG&E Diablo Canyon Power Plant (DCPP) Receiving Water Monitoring Program 2014 Annual Report," dated April 29, 2015, submitted the NPDES Receiving Water Monitoring Program: 2014 Annual Report. PG&E Letter No. DCL-2016-518, "PG&E Diablo Canyon Power Plant (DCPP) Receiving Water Monitoring Program 2015 Annual Report," dated April 27, 2016, submitted the NPDES Receiving Water Monitoring Program: 2015 Annual Report.

#### 2.1.3. Thermal Effects Study

DCPP submitted the final thermal effects comprehensive assessment report to the CCRWQCB and the NRC in PG&E Letter DCL-98-585, "Re: PG&E Diablo Canyon Submittal – Diablo Canyon Thermal Effects Analysis Report Chapter 2 – Assessment of Thermal Effects," dated November 5, 1998.

#### 2.1.4. 316(b) Studies

PG&E Letter No. DCL-2000-514, "Re: PG&E Diablo Canyon Submittal – Diablo Canyon Power Plant – 316(b) Demonstration Report" submitted 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 (EPA) and/or state-approved herbicides and applies them in accordance with all applicable regulations.

Another component of the vegetation management program is mastication. Mastication is utilized to reduce fuel loads, create fire breaks, maintain line clearance, and increase line of sight in rights-of-ways. Mastication is a vegetation management tool that reduces ground disturbance and is effective at controlling vegetation when used in conjunction with herbicides.

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 DCPD Interdepartmental Administrative Procedure EV1.ID2, "CA-SLO-2 Site Management." 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 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 October 12, 2015 by the PG&E Senior 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 at a gradual pace despite soil stabilization and revegetation work completed in late 2011. Nonetheless, no significant changes were observed since the last monitoring event completed in 2014. 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. The signage around site CA-SLO-2 is in place and in very good shape, instructing all visitors to contact DCPM Management prior to entering the controlled site boundary.

Dense vegetation that covers much of the site has stabilized loose soil, limiting erosion and obscuring surface artifacts. Localized erosion along Diablo Creek Road may be addressed through revegetation measures during the fall of 2016 if enough moisture is forecast to sustain the plantings. The gradual loss of deposits along portions of the marine terrace subject to natural erosion is being monitored.

#### B. Northern Chumash Correspondence

Over the course of 2015, PG&E corresponded and met with representatives of the local Northern Chumash community in connection with projects and land stewardship initiatives unrelated to the management of CA-SLO-2. No Native American site visits were made to CA-SLO-2 in 2015.

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

There were no unusual or important environmental events during 2015.

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

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

There were no EPP noncompliances during 2015.

##### **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 2015 per the EPP, and therefore no nonroutine reports were submitted to the NRC.