



February 2, 2021

Bruce A. Watson, Chief
Reactor Decommissioning Branch
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: GEH Vallecitos Nuclear Center (VNC) Request for Alternate Decommissioning
Schedules for DPR-1, DR-10 and TR-1 Licenses

Dear Chief Watson:

This letter provides the comments of the California State Energy Resources Conservation and Development Commission (Energy Commission) on the above-referenced action. The Energy Commission is California's primary energy policy and planning agency, with core functions that include evaluating and proposing mitigation for public health, safety, and environmental impacts¹ of proposed thermal power plants, including nuclear reactors. Since the adoption of California Assembly Bill No. 1632 (Blakeslee, 2006), the Energy Commission has taken the lead role in assessing the local costs, impacts, and policy issues associated with California's active and decommissioning nuclear power plants along the state's seismically vulnerable coastline.²

I am the Chair of the California Energy Commission and the State's Liaison Officer to the United States Nuclear Regulatory Commission (NRC). In my role as the Liaison Officer, I provide the NRC with information on matters pertinent to California including the state's radiological health, emergency preparedness, Energy Commission and California Public Utilities Commission actions, and state nuclear safety matters.

California currently hosts two operating power reactors, three power reactor facilities at various stages of decommissioning, and multiple operating and decommissioning research reactors. As a member of the Agreement State Program, California has more than 1,700 specific licenses authorizing possession and use of radioactive materials.

¹ The California Environmental Quality Act (CEQA) makes environmental protection a mandatory part of every California state and local (public) agency's decision-making process. The 2019 CEQA statutes and guidelines can be found at https://resources.ca.gov/-/media/CNRA-Website/Files/Programs-and-Projects/CEQA/CEQA-Homepage/2019_CEQA_Statutes_and_Guidelines.pdf?la=en&hash=28D5D3CF051762486FC0A43BB50921F85E30E8CC.

² California Assembly Bill No. 1632 (Blakeslee, 2006). Retrieved from http://leginfo.ca.gov/pub/05-06/bill/asm/ab_1601-1650/ab_1632_bill_20060929_chaptered.html.

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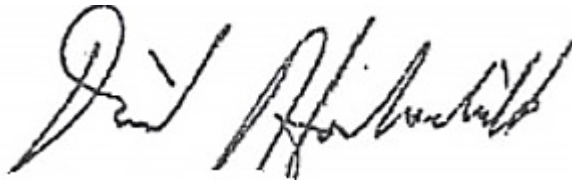
Page 2

With regards to the GE Hitachi Nuclear Energy Americas LLC NRC Licenses DPR-1 (VBWR), DR-10 (EVESR), and TR-1 (GETR) located at the Vallecitos Nuclear Center, most of the radiological material have been removed and the remaining primary decommissioning materials are non-radiological components. I understand that the primary stated purposes of this extension are to align the decommissioning of the various onsite components with the closure of the currently operating facility, an R-33 (NTR) licensed reactor. Additionally, I am aware of an ongoing discussion regarding the potential historical relevance of the site, but I will defer to the appropriate entities on how and to what extent the site is designated as historically significant.

I am opposed to the alternate decommissioning schedule for shut down reactor licenses DPR-1, DR-10, and TR-1 requested by GE Hitachi Nuclear Energy Americas LLC. A radiological license carries a clear expectation of site cleanup and decommissioning. The burden of decommissioning planning and cost fall upon the operator. The citizens of a state or community should not be expected to bear the burdens of decommissioning outside of the agreed upon time frames and expected costs.

I welcome future dialogue on this and related issues and look forward to working with the U.S. Nuclear Regulatory Commission's staff. Please send any future notices, correspondence, and documents to my Senior Nuclear Policy Advisor Justin Cochran, Ph.D., at the California Energy Commission, MS-39, 1516 Ninth Street, Sacramento, CA, 95814-5512, or by e-mail at Justin.Cochran@energy.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "David Hochschild". The signature is fluid and cursive, with a large initial "D" and "H".

David Hochschild
Chair
California Energy Commission