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# PUBLIC SUBMISSION

**Docket:** NRC-2022-0132

Pacific Gas and Electric Company; Diablo Canyon Nuclear Power Plant, Units 1 and 2; Post-Shutdown Decommissioning Activities Report

**Comment On:** NRC-2022-0132-0001

Pacific Gas and Electric Company; Diablo Canyon Nuclear Power Plant, Units 1 and 2; Post-Shutdown Decommissioning Activities Report

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## Submitter Information

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**Government Agency Type:** Local

**Government Agency:** League of Women Voters of San Luis Obispo County

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## General Comment

Docket ID NRC-2022-0132 Please see the attached letter regarding Diablo Canyon Power Plant Decommissioning versus possible license extension

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## Attachments

Letter on Diablo Decommissioning 8-15-22



## LEAGUE OF WOMEN VOTERS® OF SAN LUIS OBISPO COUNTY

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August 15, 2022

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### Diablo Canyon Power Plant Decommissioning Panel California Energy Commission

The League of Women Voters of San Luis Obispo County (LWV SLOCO) has been following the issues of the Diablo Canyon Nuclear Power Plant decommissioning and the possibility of license extension. The California League of Women Voters has adopted positions that promote the environmentally sound use of energy resources, with consideration of the entire cycle of energy production; predominant reliance on renewable resources; and policies that limit reliance on nuclear fission. With the desire to see our community well-informed of potential consequences of an extension, we ask the appropriate agency or company to answer the questions below.

#### Energy needs

1. What is the status of the current plan to provide energy when the DCPD is decommissioned?
2. What has changed that would require the power from DCPD?
3. If Diablo Canyon is de-commissioned on schedule, what can the public expect (quantify) in terms of interruption to electric power? How much of that can be mitigated with a cost of more CO<sub>2</sub> (gas fired plants)? Where and how will the line be drawn along the continuum from no additional CO<sub>2</sub> to using all available sources?
4. What other options to extension of DCPD operation have or should be considered? Are there new options in light of emerging technologies and innovations? Possible examples might include
  - a. V2G\* storage,
  - b. more home battery backup systems,
  - c. acceleration of installation of battery storage,
  - d. development of a smarter grid to forestall consequences of dependence on intermittent renewable energy sources,
  - e. incentivization of solar thermal electricity, such as heating a fluid (even salt to get it to a molten stage) that can drive steam turbines well after the sun goes down,
  - f. use of gravity potential energy from pumping water to higher elevation during the day for hydro power at night.

Safety

1. What are the safety issues for extension of DCPD operation? Specifically
  - a. How will additional nuclear fuel storage be handled given that both the spent fuel pools' and casks' capacity is full?
  - b. What is the delayed maintenance due to the anticipated decommissioning and how will it be addressed?

Timescale and process

1. Will the extension of DCPD operation require re-licensing, extension of the current license, or some other process? What is the timescale and cost?
2. What agencies and decision-making bodies will have a say over the decision on license extension or relicensing, and what is the timing of the public process of each agency or decision-making body?
3. If the request is for an extension rather than relicensing, what guarantee does the public have that there might not be further extensions, adding up to a span of years that would normally warrant the full process of relicensing?
4. What is to become of the money that has been spent and work that has been done on the application and DEIR for the Decommissioning Plan being processed by the County? Will this effort simply be abandoned, or will the work somehow be folded into a new application and DEIR with a different project description? Will the extension of DCPD operation constitute a "project" under CEQA, and, if so, will the County remain the Lead Agency? If not, what agency will be the place for the public to go with its questions and concerns?

Collateral Impact

1. What are the environmental impacts of extension of DCPD operation and their mitigations?
2. What is the impact on future planned use of the facility for other power purposes such as the offshore wind turbines?
3. Is there any intention to request permission for the seismic blasting approved by the State Lands Commission in 2012 and then denied by the Coastal Commission, and, if so, who, under present circumstances, would have the authority to permit or deny this?

Relative cost

1. What is the cost per kWh of continuing DCPD operation versus renewable power sources such as developing additional solar power with storage batteries? Given the net investment it will take to reverse course and extend the life of Diablo Canyon, is it more cost effective to invest those monies in renewable sources of energy.
2. What would be the estimated costs related to covering the delayed maintenance issues that have occurred if the DCPD is continued?

Thank you for your time and consideration.

Cindy Marie Absey, President

League of Women Voters of San Luis Obispo County

Neil Havlik and Kim Murry

Co-Chairs, Natural Resources Committee, League of Women Voters of San Luis Obispo County