


## [EXT]RE: CGNP's Support for the DCPD Delayed Decommissioning Option

government@cgnp.org <government@cgnp.org>

Mon 9/4/2023 11:21 PM

To: PL\_Diablo <PL\_Diablo@co.slo.ca.us>

 1 attachments (158 KB)

CGNP's Support for Delayed DCPD Decommissioning 09 04 23.pdf;

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Susan Strachan

San Luis Obispo County Department of Planning & Building

976 Osos St., Rm 300

San Luis Obispo, CA 93408

[diablo@co.slo.ca.us](mailto:diablo@co.slo.ca.us) Email

September 4, 2023

Hello Susan:

Thank you for insuring that the hundreds of pages of written comments by the independent nonprofit Californians for Green Nuclear Power, Inc. have been posted to the Diablo Canyon Power Plant (DCPP) decommissioning website. [https://www.slocounty.ca.gov/Departments/Planning-Building/Grid-Items/Community-Engagement/Active-Planning-Projects/Diablo-Canyon-Power-Plant-Decommissioning-\(1\)/Draft-Environmental-Impact-Report.aspx](https://www.slocounty.ca.gov/Departments/Planning-Building/Grid-Items/Community-Engagement/Active-Planning-Projects/Diablo-Canyon-Power-Plant-Decommissioning-(1)/Draft-Environmental-Impact-Report.aspx) All of CGNP's testimony supports extended DCPD operations well beyond 2025.

Please include and act upon CGNP's attached two-page Comments.

Sincerely,

/s/ Gene Nelson, Ph.D. CGNP Senior Legal Researcher and President  
Californians for Green Nuclear Power, Inc. (CGNP)  
1375 East Grand Ave Ste 103 #523  
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September 4, 2023

**Subject: CGNP's Support for Delayed DCPD Decommissioning**

Hello, Ms. Strachan:

Independent nonprofit Californians for Green Nuclear Power, Inc. (CGNP) strongly advocates for extended Diablo Canyon Power Plant (DCPP) operations well beyond 2025. CGNP has already supplied the County of San Luis Obispo with several hundred pages of written comments in support of extended DCPD operations.

CGNP is gratified that the California legislature and California governor Gavin Newsom enacted SB 846 on September 2, 2022, preserving the option of extended DCPD operations. In addition, relevant federal actions such as approving Department of Energy loan programs for DCPD extended operations and the NRC's March 3, 2023 granting a waiver of the "five year rule" for timely submission of PG&E's License Renewal Application, as has already occurred for five other nuclear power plants, are positive developments. Furthermore, the August 23, 2023 rejection of a Friends of the Earth lawsuit CGC-23-605757 by the Superior Court of the County of San Francisco supports DCPD extended operations.

However, CGNP continues to be concerned with the improper scoping of DCPD decommissioning. A necessary condition for any decommissioning is that currently-operating DCPD cease operations. Such a cessation will inevitably increase

carbon emissions as either dispatchable natural gas-fired generation or dispatchable out-of-state coal-fired generation (or a combination) will be required to replace DCPD, a reliable, dispatchable baseload generator to preserve California electricity grid stability. The emissions increase to replace DCPD's annual typical 18 billion kilowatt-hours of electricity generation will be between 7 million to 16 million tons of carbon dioxide each year, depending on the coal - natural gas mix required to replace DCPD. This emissions increase must be included within the scope of all decommissioning options *except* delayed decommissioning with extended operations in accord with SB 846. Furthermore, there is the harm to the region's and the state's economy if DCPD's reliable operations cease. A 2013 study by the Cal Poly San Luis Obispo Orfalea School of Business estimated the direct and indirect economic losses to the region would be about a billion dollars each year.<sup>1</sup> Statewide, the economic losses would approximately double. With inflation since 2013, these economic losses associated with the loss of the region's largest private-sector employer would now be much larger.

CGNP respectfully requests that the above harms associated with the cessation of DCPD operations be included within the scope of the proposed DCPD decommissioning - *except* for extended DCPD operations being preserved with the enactment of SB 846 more than a year ago. DCPD's benefits persist for each year the plant remains in operation. DCPD is safe and well-maintained. It has a design lifetime of approximately a century.

Please confirm timely receipt of CGNP's comments in advance of the September 25, 2023 submission deadline.

Sincerely,

/s/ Gene Nelson, Ph.D. CGNP Senior Legal Researcher and President  
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<sup>1</sup> <https://calcoastnews.com/2013/10/diablo-canyon-boosts-local-economy-nearly-1-billion-pge-says/>