



Santa Lucia Chapter
P.O. Box 15755
San Luis Obispo, CA 93406
(805) 543-8717
www.santalucia.sierraclub.org

August 2, 2011

RE: Docket number 11-IEP-1J

Dear Commissioners,

On April 17, 2006, the California State Lands Commission passed a resolution urging “the California Energy Commission and the State Water Resources Control Board to expeditiously develop and implement policies that **eliminate** the impacts of once-through cooling on the environment, from all new and existing power plants in California.” [emphasis added]

As the Energy Commission assesses its recommendations on future energy policy in California, we would urge that the full cost of converting the Diablo Canyon Nuclear Power Plant and the San Onofre Nuclear Generating Station to closed-cycle cooling not be minimized, and that these costs be weighed against the cost of securing equivalent alternate renewable energy sources. The Commission should not assume that proposed EPA regulations on OTC, which fail to require closed cycle cooling as the Best Technology Available, will be adopted as proposed, or that California will otherwise allow PG&E and SCE to continue the impacts of once-through cooling, at a reduced level, through the end of the operational lives of their nuclear power plants.

We attach relevant excerpts from the major 2001 NIRS report “Licensed to Kill” on the damage done by DCNPP to the Central Coast’s near-shore environment and includes a chronology of the actions taken by PG&E in violation of its permit, its failure to comply, its suppression of data and fines incurred as a result. This history should be taken into account in evaluating the likelihood of the utility complying with measures to reduce the impacts of OTC rather than a requirement either to change to a non-destructive cooling technology or cease plant operations.

The summary of impacts presented in this report makes clear that, even before assessing the safety, cost and reliability of nuclear power, the Commission should conclude that the state must undertake a shift away from nuclear power plants to energy sources that will not decimate the marine environment of California’s coast.

Thank you for your attention to this matter,

Andrew Christie
Director

DOCKET

11-IEP-1J

DATE AUG 02 2011

RECD. AUG 02 2011