

Please consider the following comments at the CEC nuclear workshop:

Diablo Canyon nuclear waste is being stored in containers multiple times their original capacity. The U.S. Department of Energy's Blue Ribbon Commission should come to California to explain why our state should risk another 20 years of radioactive waste production on seismically active coastal zones.

The Fukushima nuclear plant has been shut down indefinitely (permanently). This raises the question of replacement of energy generation in a disaster. Southern California Edison and Pacific Gas & Electric should undertake immediate studies to determine how they would replace 4400 MW of baseload generation in the short and long term should their nuclear plants be rendered unusable by a seismic event or other natural disaster as well a potential shutdown due to acts of malice or terror.

The cost of repairing damage resulting from a disaster will most likely far exceed the existing U.S. liability limits. The federal government must review liability limits under Price-Anderson (\$12.6 billion) in light of damage estimates that exceed \$100 billion in Japan.

Diablo Canyon nuclear facility is old. The population of the area has changed and more earthquake faults in the surrounding communities have been discovered. The 1967 Certificate of Public Convenience and Necessity (CPCN) issued for Diablo Canyon should be reviewed and updated in light of new evidence on population, seismic vulnerabilities, and absence of a permanent offsite solution to safe storage of highly radioactive waste.

The NRC recommended that residents in Japan voluntarily evacuate an area 50 miles around the Fukushima plant. Yet, the evacuation zone around Diablo Canyon is only 20 miles and the population within a more-than-20 mile area has vastly increased without a similar increase in evacuation plans, routes and systems. An update and analysis is needed of the costs associated with increasing the emergency planning and evacuation zones from 20 to 50 miles and beyond in the wake of the NRC's own recommendation that residents voluntarily evacuate a similar sized area around Fukushima.

Thank you.

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Leon Goldin

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