

Attachment A: EIR Addendum

Diablo Canyon Power Plant Steam Generator Replacement Project

CPUC Energy Division

April 12, 2007

Summary

Pacific Gas and Electric Company (PG&E) filed an application (A.04-01-009) with the California Public Utilities Commission (CPUC) on January 9, 2004 for the Diablo Canyon Power Plant (DCPP) Steam Generator Replacement Project (SGRP). The CPUC is the *Lead Agency*, responsible for compliance with the California Environmental Quality Act (CEQA). The CEQA process culminated in a Final Environmental Impact Report (EIR) for the SGRP in August 2005 (State Clearinghouse Number 2004101001). The Final EIR was certified and the mitigation measures that were identified in the Final EIR were adopted by the CPUC on November 18, 2005 (D.05-11-026). The Final EIR has also been used by *Responsible Agencies* as defined by CEQA Guidelines Section 15381, including the County of San Luis Obispo, as part of their discretionary action and approval process.

In February 2007, the CPUC entered into a Memorandum of Understanding (MOU) with the Environmental Coordinator of the County of San Luis Obispo to set out the responsibilities of the agencies during the construction of the SGRP. While the MOU places the responsibility to monitor and enforce the mitigation measures identified in the Final EIR with the County, the agreement also reserves the right of the CPUC to exercise its independent authority over PG&E, the MMRP, and the SGRP as the CEQA lead Agency.

PG&E has informed the CPUC that a revision to the grading plan for the original steam generator storage facility (OSGSF) is needed to satisfy Uniform Building Code (UBC) requirements. Construction of the on-site storage structure was approved as part of the SGRP approval. PG&E subsequently found that no suitable soil for the original grading plan is available on-site, and PG&E now proposes to revise the grading plan to allow import of approximately 2,500 cubic yards of soil from an off-site location.

The CPUC has reviewed the proposed modifications and prepared this Addendum to the Final EIR. The impact levels presented in the Final EIR remain unchanged. The CPUC finds that a Subsequent EIR is not required pursuant to CEQA Guidelines Section 15162 because these modifications would not cause any new significant environmental effects or a substantial increase in the severity of previously identified impacts. Because none of the conditions requiring preparation of a Subsequent EIR described in Section 15162 have occurred, the CPUC finds that the preparation of an Addendum is appropriate, pursuant to CEQA Guidelines Section 15164.

Proposed Modification

The approved SGRP includes four major phases: (1) transportation of the replacement steam generators (RSGs) to DCPP; (2) staging and preparation of the RSGs; (3) removal, transport, and storage of the original steam generators (OSGs); and (4) RSG installation. These SGRP activities were the subject of the August 2005 Final EIR. As part of OSG storage, the EIR addressed construction of a permanent on-site storage facility designed to store the OSGs until decommissioning of DCPP. The OSFSF will be an

18,000-square-foot reinforced concrete building at the upper portion of the DCPD site near the existing 500 kV switchyard. Construction of the OSGSF involves relocating utilities, excavating existing soil for the structure's foundation and associated utilities, and backfilling, grading, and paving around the completed structure. The EIR addressed generating approximately 2,300 cubic yards (cy) of excavated material, or spoils, to be removed and stored on-site (as in EIR Section B.3.3.3). The SGRP does not involve hauling excavated material off-site.

Subsequent to the CPUC's approval, PG&E determined the grading plan for the OSGSF must be modified to satisfy Uniform Building Code (UBC) Plasticity Index requirements for the base soil for a portion of the road adjacent to the OSGSF. Originally, it was believed that suitable soil for the road fill could be found on-site. The soil was placed in the subject roadway area and tested per UBC standards. Although the soil satisfied compaction requirements, the PI requirements were not met. For replacement soil, PG&E proposes to import material from an off-site source in Santa Margarita.

Bringing off-site soil to the OSGSF would involve additional truck traffic above that considered in the EIR. Approximately 2,500 cubic yards of Class 2 base soil are required to be brought to DCPD from the Santa Margarita site which is less than 30 miles one-way from the OSGSF work area. Approximately 125 truckloads carrying 20 cubic yards of imported soil will be required. PG&E would adhere to all adopted mitigation measures identified in the EIR, with those for Traffic and Circulation being particularly relevant (LSA, 2007a).

Environmental Impacts of Proposed Modification

Air Quality

The proposed modification would cause increased emissions from truck traffic and heavy off-road construction equipment for excavation and relocation of approximately 2,500 cubic yards of material in addition to the construction emissions analyzed in the EIR. Trucks would make approximately 25 additional round-trips per day, over five days, during the proposed revision to OSGSF construction. The EIR analyzed preliminary plans for construction of the OSGSF and found that construction activities could cause emissions over the significance thresholds established by the San Luis Obispo Air Pollution Control District (SLOAPCD), depending on phasing of the work.

The EIR assumed that OSGSF construction would overlap with staging and preparation of the replacement steam generators and construction of the Temporary Storage Area (TSA). The overlapping emissions from staging, preparation, and construction of TSA and OSGSF were found (in Final EIR Table D.2-8b) to exceed 2.5 tons of nitrogen oxides (NO_x) per quarter, and mitigation measures were identified to reduce on-road traffic emissions and diesel equipment combustion emissions in a manner consistent with SLOAPCD recommendations.

PG&E developed a Construction Activity Management Plan (CAMP), in accordance with the EIR mitigation measures for Air Quality. The March 2007 version of the CAMP includes information on phasing of the SGRP that has been refined since the time of the EIR. According to the current CAMP (LSA, 2007b), OSGSF construction will occur before other staging and preparation as Phase 1 of the SGRP work, separate from TSA construction. During Phase 1, the proposed hauling of imported soil would occur. The emissions from Phase 1 of SGRP work and the additional emissions of the proposed grading plan revision are shown in Table A-1.

Table A-1. Maximum Daily Emissions during OSGSF Construction

	NOx	VOC	PM10	CO	SOx
	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)
Phase 1 of SGRP					
OSGSF Construction (Equipment and Worker Commutes)	73.2	8.6	4.6	51.4	8.3
Grading Plan Revision over Five Days (Loading, Trucks, and Worker Commute)	53.4	4.3	2.0	38.2	2.2
Peak Daily Total for Phase 1	126.6	12.9	6.6	89.6	10.5
Significance Criteria	185	185	None	None	None

Source: LSA, 2007a (OSGSF Construction and Grading Plan Revision verified by CPUC Energy Division).

Temporary emissions caused by OSGSF construction and the proposed grading plan revision, including importing soil over five days, would not exceed the daily thresholds established by the SLOAPCD. The quarterly emissions of Phase 1 with the grading plan emissions are expected to be less than 2.5 tons of NOx because peak daily OSGSF construction activity would not occur every day. Because Phase 1 and soil import activities will occur earlier than and separately from other staging and preparation activities, the peak daily and quarterly emissions for Phase 1 with the grading plan revision would be less than those analyzed in the EIR.

Mitigation Measures A-1a and A-1b in the EIR require PG&E to conduct the proposed grading and hauling activity in a manner consistent with the CAMP, which includes strategies for diesel combustion emissions control and trip reduction. With the phasing specified in the CAMP and the EIR mitigation measures for Air Quality, the emissions from the proposed grading plan revision would not cause any new significant air quality impacts or any increase over the impacts analyzed in the EIR.

Geology, Soils, and Paleontology

The proposed modification would involve importing soil for a portion of the road adjacent to the OSGSF. PG&E indicates that the imported soil would satisfy compaction requirements and UBC Plasticity Index requirements. Prior to use, PG&E would ensure that contamination or hazardous materials are not present in the imported soil.

Grading at the OSGSF must comply with EIR mitigation measures related to Geology, Soils, and Paleontology, which require addressing slope stability issues that could adversely impact roads or the storage site through geotechnical and slope stability evaluations. The design of the OSGSF would need to be in accordance with all applicable building codes. By using suitable soil in compliance with UBC requirements, the proposed revision would not cause impacts greater than those analyzed in the EIR, and no new soil-related environmental impacts would occur.

Traffic and Circulation

The proposed modification would require approximately five days of additional truck activity to bring the replacement soil to the site. Over five days of importing, trucks would make approximately 25 round-trips per day. PG&E proposes to import the soil during non-peak times, and to avoid potential damage to roadways, only legal loads would be carried.

The EIR analyzed the traffic effects of trucks making 10 round-trips per day for delivery of materials and a total worst-case of 710 round-trips per day of all vehicles including workers commuting during staging

and preparation periods of the SGRP. The impacts of up to 950 daily round-trips were analyzed for installing the replacement steam generators. Importing the soil would occur prior to these worst-case traffic conditions analyzed in the EIR, which occur during later phases of the SGRP. Because importing the soil would not overlap with the phases of the worst-case SGRP-related traffic, this revision would not cause traffic impacts greater than those shown in the EIR.

PG&E proposes to import the soil in compliance with Traffic and Circulation mitigation measures identified in the EIR, which require avoiding peak tourist season and peak hours. Mitigation Measures T-2a, T-2b, and T-3a from the EIR require PG&E to develop a trip reduction program and project schedule to restrict project-related travel on Avila Beach Drive during certain times. The trip reduction program required by Mitigation Measure T-3a will include a materials and machinery delivery program that would avoid project-related truck traffic on Avila Beach Drive. By avoiding overlap with the peak hours, the mitigation measures for Traffic and Circulation would ensure that no substantial increase in local traffic occurs.

EIR Mitigation Measures Applicable to Proposed Modification

Table A-2 summarizes the EIR mitigation measures that are applicable to the proposed modification.

Table A-2. Mitigation Measures Presented in the Project EIR, Applicable to the Proposed Modification

Mitigation Measure Number	Mitigation Measures
Air Quality	
A-1a	Develop and implement a trip reduction plan.
A-1b	Develop and implement a diesel combustion emission control plan.
A-2a	Use registered portable equipment.
Geology, Soils, and Paleontology	
G-1a	Prevent overloading of unstable ground along transport route.
G-3a	Long Term Seismic Program Update.
G-4a	Evaluate slope stability in the vicinity of the OSG Storage Facility site.
Traffic and Circulation	
T-2a	Avoid travel during peak season on Avila Beach Drive and other local surface roads.
T-2b	Avoid travel during peak time on Highway 101.
T-3a	Develop a trip reduction program.

Source: Mitigation Monitoring, Compliance, and Reporting Program adopted by CPUC D.05-11-026, November 18, 2005.

Other Impacts Found Not to be Significant

The proposed grading revision would not change level of other impacts identified in the EIR. All SGRP activities, including the proposed modification are subject to adopted mitigation measures for: Biological Resources; Cultural Resources; Hazardous Materials; Hydrology and Water Quality; Land Use, Recreation, and Agriculture; Noise and Vibration; Public Services and Utilities; System and Transportation Safety; and Visual Resources.

Conclusion

As documented above, the proposed modification to the approved Steam Generator Replacement Project would not result in new or increased impacts that would require implementation of new mitigation measures beyond those in the EIR. Therefore, preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

References

- LSA (LSA Associates, Inc.) 2007a. Letter to Mr. Jeff Olivera, San Luis Obispo County, Department of Planning and Building. Subject: Pacific Gas and Electric Company (PG&E), Diablo Canyon Power Plant (DCPP), Original Steam Generators Storage Facility: Minor Grading Revision. March 23.
- LSA. 2007b. Pacific Gas and Electric Company, Construction Activity Management Plan, Prepared in response to the Final Environmental Impact Report, Mitigation Monitoring and Reporting Program. March.

(END OF ATTACHMENT A)