



May 4, 2009

The Commissioners Jeffrey Byron and James Boyd
California Energy Commission
1516 9th Street
Sacramento, CA 95814
Via Facsimile: 916-323-2232

DOCKET	
09-IEP-10	
DATE	May 04 2009
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RE: Maintaining Electric System Reliability When Eliminating Once-Through Cooling Power Plants

Dear Commissioners Brown and Boyd:

The Alliance for Nuclear Responsibility (A4NR) submits the following comments for discussion at the May 11, 2009, Commission workshop on system reliability and once-through-cooling:

California's remaining nuclear reactors should be allowed to operate with their existing once-through-cooling systems through the end of their current licenses, upon the condition of an amendment to PRC 25524 which would prohibit license renewal beyond the current license terms, due to the severe and ongoing impacts of once-through cooling.

Without this condition, A4NR strongly recommends shutdown of California's operating reactors or construction of alternative cooling methods by 2015.

The Alliance believes the costs to build dry or wet cooling facilities at the state's coastal nuclear reactors would be better spent on investigating replacement of nuclear facilities which are the largest users of once-through cooling at close to one million gallons per minute.

While the majority of the once-through cooled power plants may have higher rates of greenhouse gas and other pollutant emissions than modern nuclear generators, California's nuclear reactors emit hundreds of tons of highly radioactive material and are the state's largest *thermal* polluters under the Clean Water Act. With the recent disclosures by the Obama administration that Yucca Mountain is no longer an option for the permanent storage of radioactive waste, it is also vital to the safety of our coastal waters that the production of radioactive waste cease no later than the end of current license terms.

A4NR believes this is a fair amendment for all. PG&E, SCE and the State have 12 to 15 years in which to plan for the replacement of these larger generators; the aging workforce can retire in their jobs; the water impacts will end at a date certain without costly cooling systems; and the amount of radioactive waste emitted and stored (indefinitely) on our coast will be limited.

In conclusion, the Alliance for Nuclear Responsibility supports the above amendment of PRC 25524 and requests the phase out nuclear reactors no later than current license contracts. Absent that amendment, the Alliance supports construction of cooling towers or dry cooling by 2015.

Thank you again for your leadership on this important issue.

Sincerely,

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Attachments: Presentation to Joint Natural Resources and U&C, New York Riverkeeper's DEIS OTC Comments and Expert Testimony