

June 19, 2024

Ms. Maureen R. Zawalick
Vice President, Business and Technical Services
Diablo Canyon Power Plant, P.O. Box 56
Avila Beach, CA 93424

Re: PG&E Letter DCL-24-064 replying to my letter of February 26, 2024

Dear Ms. Zawalick:

Thank you for your June 17, 2024 response to my earlier inquiry concerning PG&E's evaluation of a hypothetical San Simeon-type earthquake **directly beneath** the Diablo Canyon Nuclear Power Plant. My client, the Alliance for Nuclear Responsibility, is interested in whether and how PG&E has responded to the 2008 recommendation of the California Energy Commission's AB 1632 Report that the company perform a deterministic study "to evaluate the full implications of this earthquake, particularly for non-safety related plant components and reliability."¹

Your reference to PG&E's 2011 Shoreline Fault Zone report and 2014 Central California Coast Seismic Imaging Project (CCCSIP) report strongly suggests that the Energy Commission's recommendation remains unheeded – at least in terms of any analyses PG&E is willing to make public. The Shoreline Fault Zone report notes (at pp. 6-11, 6-38, and 6-39) the 35 km distance from the San Simeon rupture to Diablo Canyon and calculates the residuals for Figures 6-10a and 6-10b accordingly. Similarly, the cited chapter from the CCCSIP report does not make any attempt to address ground motions from a postulated M_w 6.5 earthquake on a blind thrust fault **directly beneath** the plant.

PG&E Geosciences undercuts the credibility of its use of sophisticated methodologies when it resorts to obfuscation and evasion. In 2012, the Public Utilities Commission quadrupled the ratepayer funding for PG&E's proposed seismic studies, in part "to address the CEC recommendation that PG&E assess the implications of a San Simeon type earthquake beneath Diablo Canyon."² To learn that this evaluation may never have been performed, at a time when PG&E has eagerly sought generous taxpayer support for extending Diablo Canyon's operations, is a reminder of why the company continually faces such reputational challenges.

Sincerely,

/s/ John L. Geesman
Attorney for Alliance for Nuclear Responsibility

¹ An Assessment of California's Nuclear Power Plants: AB 1632 Report, November 2008, p. 7.

² D.12-09-008, p. 17.

PG&E Letter DCL-24-064

John L. Geesman
DICKSON GEESMAN LLP
Attorney for Alliance for Nuclear Responsibility

Subject: Response to Letter from John L. Geesman Regarding the Seismic Update Discussion at February 22, 2024 DCISC Meeting

Reference:

1. John L. Geesman letter to PG&E, Follow-up to seismic update discussion at February 22, 2024 DCISC meeting, dated February 26, 2024.

Dear Mr. Geesman:

Reference 1 requested PG&E provide responses to the questions below:

- (1) Has PG&E performed the deterministic evaluations recommended by the California Energy Commission's AB 1632 Report?
- (2) If not, why not?
- (3) If so, will PG&E make such evaluations available for public review?

PG&E completed deterministic evaluations of a San Simeon-type earthquake beneath the plant hosted by the Los Osos and San Luis Bay faults and documented the results in Chapter 6 of the 2011 Shoreline Fault Zone report. Fault parameters for the Los Osos fault were later updated in a deterministic sensitivity study and impact evaluation that incorporated findings from advanced seismic studies conducted in response to recommendations in the 2008 California Energy Commission AB-1632 report and documented in Chapter 13 of PG&E's 2014 Central California Coast Seismic Imaging Project (CCCSIP) report. The CCCSIP studies found that the 84th percentile deterministic ground motions for the Hosgri-San Simeon, Shoreline, Los Osos, and San Luis Bay faults are bounded by the 1977 Hosgri Earthquake (HE) and 1991 LTSP/SSER 34 spectrums for both the DCPD power block and turbine building. The CCCSIP report is publicly available [here](#)¹ on the PG&E website.

Please contact Thomas Jones at (805) 459-4530 or by email at tom.jones@pge.com if you have any questions or would like to discuss further.

Sincerely,



Maureen R. Zawalick

June 17, 2024

Date

¹ <https://www.pge.com/en/about/pge-systems/nuclear-power/seismic-safety-at-diablo-canyon.html#accordion-4419013034-item-7c819412cf>