

## CALIFORNIA COASTAL COMMISSION

45 FREMONT STREET, SUITE 2000 SAN FRANCISCO, CA 94105-2219 VOICE (415) 904-5200 FAX (415) 904-5400 TDD (415) 597-5885



November 2, 2017

Kristine Svinicki, Chair U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Rick Perry, Secretary U.S. Department of Energy 1000 Independence Ave., SW Washington, DC 20585

Re: Need for Permanent Storage Site for Nuclear Waste from California Coastal Nuclear Power Plants

Dear Chair Svinicki and Secretary Perry:

On behalf of the California Coastal Commission ("Coastal Commission"), I am writing to urge you to work with Congress to expedite the nation's efforts to identify and develop a safe, secure long-term storage facility for the spent nuclear fuel currently stored at nuclear power plant sites around the country. Action on finding a permanent waste repository or consolidated interim storage facility suitable for long-term storage has long been a vital national goal, and one which we wholeheartedly share. Meeting this goal is particularly urgent now, in order to alleviate the need for on-going storage at coastal power plant sites, which may be at risk from natural hazards such as earthquakes, erosion, flooding and sea level rise in the coming decades.

Because no permanent storage facility has yet been found, the Commission has had little choice but to issue coastal development permits for spent fuel dry storage facilities constructed at the three coastal nuclear power plants in California: Humboldt Bay Nuclear Power Plant, Diablo Canyon Nuclear Power Plant and San Onofre Nuclear Generating Station. It has been clear since the inception of the Commission's authority in 1973 that the on-going storage of radioactive waste at coastal power plants – and, in the case of San Onofre, in close proximity to major Southern California urban areas – presents serious risks to coastal uses and resources in the event of a radiation release into the environment.

The dry storage facilities and/or spent fuel pools at Humboldt, Diablo Canyon and San Onofre are each, to varying degrees, subject to natural hazards such as ground shaking from earthquakes, coastal erosion, and flooding from storms or tsunamis. Though the on-site storage facilities were sited and designed to withstand these hazards in the near term, they were never designed to store spent fuel in perpetuity. The risks presented by natural hazards, especially coastal erosion and flooding driven by sea level rise, to spent fuel storage at coastal sites, will only increase over time and render even more imperative the need to transfer of the spent fuel to a secure inland location.

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We greatly appreciate your consideration of our comments on these matters of significant statewide and national public concern. If you have any questions, please contact Alison Dettmer, Deputy Director of the Energy, Ocean Resources and Federal Consistency Division, at (415) 904-5240.

Sincerely,

## DAYNA BOCHCO

Chair

California Coastal Commission

cc: U.S. Senator Dianne Feinstein

U.S. Senator Kamala Harris

U.S. Senator Cory Gardner

U.S. Senator Joe Manchin III

U.S. Rep. Darrell Issa

U.S. Rep. Salud Carbajal

U.S. Rep. Jared Huffman

U.S. Rep. Fred Upton

U.S. Rep. Bobby L. Rush

CA Senator Mike McGuire

CA Senator Bill Monning

CA Senator Patricia Bates

CA Assemblyman Jim Wood

CA Assemblyman Jordan Cunningham

CA Assemblyman Rocky Chávez

Benjamin Friedman, Acting Administrator, NOAA

John Laird, California Natural Resources Agency