



November 4, 2013

Members  
Review Committee for Nuclear Fueled Power Plants  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

attention: Ms. Shuka Rastegarpour  
*Via Email:* [rastegarpour@waterboards.ca.gov](mailto:rastegarpour@waterboards.ca.gov)

Re: Bechtel Once Through Cooling Report

Dear Members of the Review Committee:

Friends of the Earth has significant concerns regarding the Draft Bechtel Report on Alternative Cooling Technologies or Modifications to the Existing Once-Through Cooling System for the Diablo Canyon Power Plant that was released in October 2013 ("draft Bechtel report").

For decades, once-through cooling has contributed to the "overall degradation of the State's marine and estuarine environments."<sup>1</sup> The Diablo Canyon Nuclear Power Plant ("Diablo Canyon") withdraws far more water than any other once-through cooled plant currently operating in California<sup>2</sup>, and the impingement and entrainment impacts are particularly significant. To insure the State Water Resources Control Board's Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling ("OTC Policy") achieves the goal of protecting marine resources from the "ongoing, critical impact"<sup>3</sup> caused by once-through cooling, it is critical Diablo Canyon comply with the OTC Policy.

We have independent expert analysis underway that suggests that the draft Bechtel report makes serious errors in regard to its representation of the effectiveness of screen technologies, while significantly inflating both the cost and time required for construction of closed cycle technologies (cooling towers). Given these errors, we are concerned about a lack of transparency about the details that underlie the Bechtel report's analysis and concerned that Bechtel's longstanding relationship to PG&E and Diablo Canyon may pose a significant conflict of interest which would skew the outcome of the analysis presented.

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<sup>1</sup> CAL. STATE WATER RES. CONTROL BD., WATER QUALITY CONTROL POLICY ON THE USE OF COASTAL AND ESTUARINE WATERS FOR POWER PLANT COOLING, FINAL SUBSTITUTE ENVIRONMENTAL DOCUMENT 1 (2010).

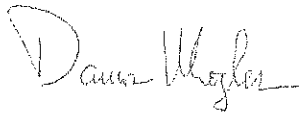
<sup>2</sup> *Id.* at 33, Table 2.

<sup>3</sup> *Id.* at 2.

Given that relationship, it is critical that there be independent peer review of the draft Bechtel report. We have arranged for such a review. With respect, we therefore request that the Committee schedule a full session at which independent expert analysts can provide substantive critique of and alternative conclusions to the draft Bechtel report. We believe that such a session would have significant bearing on whether or not this report in its current form deserves to be transmitted to the Water Resources Board.

We thank the Committee members for their work and consideration of our request in regard to this important issue.

Sincerely

A handwritten signature in cursive script that reads "Damon Moglen". The signature is written in dark ink and is positioned above the typed name.

Damon Moglen  
Senior Strategic Advisor  
Climate and Energy Program