

DIABLO CANYON
INDEPENDENT SAFETY COMMITTEE (“DCISC”)
(www.dcisc.org)

Committee Members: Najmedin Meshkati
Per F. Peterson
Raluca O. Scarlat

Wednesday & Thursday
February 18-19, 2026
Avila Lighthouse Suites

Point San Luis Conference Room
First and San Francisco Streets
Avila Beach, California

PUBLIC MEETING AGENDA

This public meeting will be webcast in real time at:

http://www.slo-span.org/local_webcast/DCISC/stream_index.htm and through <http://www.dcisc.org>.

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PARTICIPATION

You may participate in the DCISC’s public meeting in person or in real-time by accessing the Zoom webinar meeting via the weblink and the webinar ID given above or by calling any of the phone numbers provided at the top of this agenda. Instructions on how to access, view and participate in remote meetings are also provided by visiting the DCISC’s home page at <http://www.dcisc.org>. Attendees can make oral comments or ask questions of the Committee Members during the webinar meeting by using the “Raise Your Hand” feature or by pressing *9 on your telephone keypad if joining by telephone only. If you are unable to participate in real-time, you may email to dcsafety@dcisc.org with the subject line “Public Comment Item#___” (insert the item number relevant to your comment) or “Public Comment – Non-Agenda Item.” Comments will be reviewed and distributed before the meeting if received by Noon on Tuesday, February 17, 2026. Comments received after that will be addressed during the item and/or at the end of the meeting. All comments received will be read into and become part of the record, subject to a time limit determined by the presiding officer. Subject to the requirements to publish an agenda in advance, the Committee will have the option to modify its actions on items based on comments received.

In accordance with the Bagley-Keene Open Meeting Act (CA Govt. Code §§11120 et seq.) and the Committee’s Policies, for each item on the Agenda the Committee reserves the right, at the discretion of the presiding officer, to limit the total amount of time allocated for public comment on particular issues and/or for each individual public commenter. A time limit for each public commenter will be announced during every session. For any public commenter(s) who previously requested and at the discretion of the presiding officer were granted additional time an announcement will be made at the beginning of the session. Public commenters will not be recognized more than once during public comments on matters not on the agenda or during consideration of an agenda item but may be called upon subsequently to respond to questions from the Committee. Public commenters may not cede time to other public commenters.

Morning Session – 02/18/2026 – 9:00 A.M.

I CALL TO ORDER - ROLL CALL

II INTRODUCTIONS AND COMMITTEE MEMBER COMMENTS

ADVISEMENT

The Committee may consider at any time requests to change the order of a listed agenda item. Information distributed to the Committee at a public meeting becomes part of the public record of the DCISC. A copy of written or electronic material, pictures, etc., must be provided to the Committee's Legal Counsel for this purpose. Those persons making public comments are requested and encouraged to provide copies of any prepared written materials or electronic media they intend to use in their remarks to the Legal Counsel's office prior to addressing remarks to the Committee and in sufficient time such that they may be distributed. Correspondence received and sent by the Committee is on file with the Office of the DCISC Legal Counsel and copies are available upon request. Devices for attendees who may be hearing impaired are available upon request. The meeting will be webcast in real time.

III PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. (The public may comment on any matter listed on the morning's Agenda immediately following the time the matter is considered by the Committee.) *There will be a time limit for each topic and/or speaker as designated by the presiding officer as announced at the beginning of this session. No action will be taken by the Committee on matters brought up under this item, but they may be referred to staff for further study, response or action.*

IV DISCUSSION, DIRECTION AND ACTION, AS APPROPRIATE, BY THE COMMITTEE, CONSULTANTS & COUNSEL

- A. Public Outreach, Site Visits to Diablo Canyon Power Plant (DCPP), Other Committee Activities; Scheduling and Confirmation of Future Fact-Finding Visits and Public Meetings; Documents Provided to the Committee.

V INFORMATION ITEMS BEFORE THE COMMITTEE

Informational Presentations Requested by the Committee of PG&E:

- 1) State of the Plant Update including Organizational Changes, Significant Past and Future Plant Activities, Power History, Results of Refueling Outage 2R25, Significant Equipment Issues Including Unit 1 Feedwater Heater Leak, Significant Human Performance Issues, and Other Station Activities since the DCISC's October 2025 Public Meeting.
- 2) Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Open Issues Raised by NRC Resident Inspectors, Status of Cross-Cutting Issues Matrix, Current and Future License Amendment Requests, and Other Significant Regulatory Issues/Requests.

VI TECHNICAL CONSULTANT REPORTS; RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT-FINDING REPORTS TO PG&E

- B. Consultant Richard McWhorter:
Fact-finding Topics; Report on and approval of
December 2-3, 2025 Fact Finding Report.

VII ADJOURN MORNING MEETING

Afternoon Session – 02/18/2026 – 1:15 P.M.

VIII RECONVENE FOR AFTERNOON MEETING

IX COMMITTEE MEMBER COMMENTS

X PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. (The public may comment on any matter listed on the afternoon's Agenda immediately following the time the matter is considered by the Committee.) *There will be a time limit for each topic and/or speaker as designated by the presiding officer as announced at the beginning of this session. No action will be taken by the Committee on matters brought up under this item, but they may be referred to staff for further study, response or action.*

XI INFORMATION ITEMS BEFORE THE COMMITTEE

Informational Presentations Requested by the Committee of PG&E:

- 3) Update on Planning for Extended Operations including Status of License Renewal, State and Local Permitting, Project Planning and Staffing.

XII TECHNICAL CONSULTANT REPORTS; RECEIVE, APPROVE
AND AUTHORIZE TRANSMITTAL OF FACT-FINDING REPORTS TO PG&E

- C. Consultant Lisa Darden:
Fact-finding Topics; Report on and approval of
December 15-16, 2025 Fact Finding Report.
- D. Consultant Richard McWhorter:
Fact-finding Topics; Report on and approval of
January 20-21, 2026 Fact Finding Report.

XIII ACCEPTANCE OF MINUTES

- E. Minutes of October 22-23, 2025 Public Meeting. Review/Accept

XIV ADJOURN AFTERNOON MEETING

Evening Session – 02/18/2026 – 5:00 P.M.

XV RECONVENE FOR EVENING MEETING

XVI COMMITTEE MEMBER COMMENTS

XVII INFORMATION ITEMS BEFORE THE COMMITTEE

Informational Presentations Requested by the Committee of PG&E:

- 4) PG&E Evaluations of and Response to Recommendations Made by the DCISC's Seismic Review Team Included as Recommendations P/SRT-1 through P/SRT-9 in the DCISC's 35th Annual Report.

XVIII PUBLIC COMMENTS AND COMMUNICATIONS

The public may comment on the matter listed on the evening's Agenda immediately following the time the matter is considered by the Committee. Anyone wishing to address the Committee on matters not appearing on the Agenda may do so following those comments. *There will be a time limit for each topic and/or speaker as designated by the presiding officer as announced after the presentation by the Committee. No action will be taken by the Committee on matters brought up under this item, but they may be referred to staff for further study, response or action.*

XIX ADJOURN EVENING MEETING

Morning Session – 02/19/2026 – 8:15 A.M.

XX RECONVENE FOR MORNING MEETING

XXI COMMITTEE MEMBER COMMENTS

XXII DISCUSSION, DIRECTION AND ACTION, AS APPROPRIATE, BY THE COMMITTEE, CONSULTANTS & COUNSEL (Cont'd.)

- F. Receive and Discuss PG&E's Response as Supplemented to DCISC 35th Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations: July 1, 2024 – June 30, 2025, Including a Discussion with the DCISC Seismic Review Team of PG&E's Response as Supplemented to Recommendations P/SRT-1 through P/SRT-9.
- G. Regulatory and Administrative Matters Including Funding for Committee's Current and Future Activities, and Consideration of Committee Policies on Committee Response to DCPD Emergencies and a Process Map for Committee Recommendations, Concerns, Conclusions and Observations, Ratification of Agreements for Consulting Services with Mr. Richard St. Onge and Dr. G. Kenneth Koves, and Other Committee Discussion.
- H. Review of the Open Items List and Status of Recommendations.

XXIII PUBLIC COMMENTS AND COMMUNICATIONS

The public may comment on the matter listed on the morning's Agenda immediately following the time the matter is considered by the Committee. Anyone wishing to address the Committee on matters not appearing on the Agenda may do so following those comments. *There will be a time limit for each topic and/or speaker as designated by the presiding officer as announced after the presentation by the Committee. No action will be taken by the Committee on matters brought up under this item, but they may be referred to staff for further study, response or action.*

XXIV CONCLUDING REMARKS & DISCUSSION BY COMMITTEE MEMBERS OF FUTURE DCISC ACTIVITIES

- I. Future Actions by the Committee.
- J. Further Information to Obtain/Review.
- K. Confirmation of Future Site Visits, and Public Meetings.

XXV **Public Tour - 02/19/2026 - 11:30 A.M.**

PUBLIC TOUR OF DIABLO CANYON NUCLEAR POWER PLANT TO
ASSEMBLE FOR REGISTRATION

PRESENTATIONS BY THE COMMITTEE AND PG&E: POINT SAN LUIS CONFERENCE ROOM
(Prior registration and security clearance required of all public tour participants)

The Members of the Independent Safety Committee accompanied by members of the public will conduct a tour of the power plant.

In the alternative if the tour must be cancelled for any reason the committee may convene an informal question and answer session.

XXVI ADJOURNMENT OF THE ONE HUNDRED AND THIRTEENTH PUBLIC MEETING

Upon conclusion of the tour.

The DCISC's policy is to schedule its public meetings in locations that are accessible to people with disabilities and to remain in compliance with state guidelines on communicable disease prevention. Hand sanitizers and face coverings are available in the meeting room. The Avila Lighthouse Suites Point San Luis Conference Room is a wheelchair accessible facility. A person who needs a disability-related accommodation or modification in order to participate in the meeting may make a request by contacting the DCISC office (in CA 800-439-4688 or by sending a written request to the DCISC office at P.O. Box 4523, Carmel-by-the-Sea, CA 93921-4523). Providing your request at least five business days before the meeting will help ensure availability of the requested accommodation.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	February 18, 2026
AGENDA ITEM:	IV-A
AGENDA TITLE:	Public Outreach, Site Visits, Scheduling of Future Meeting Dates, Documents Provided to the Committee.

CONSENT [☐] ACTION [☒] INFORMATION [☒]

Staff Summary: It is expected that the Committee Members will hold a discussion on their public outreach activities and site visits and will confirm and schedule future activities of the Committee during the remainder of 2026 and for 2027.

The Actual and Proposed DCISC Fact-Finding and Public Meeting Items, with Key Dates, prepared by Committee Consultant McWhorter is provided for your use in reviewing and planning Committee activities.

Attached for your information are copies of the transmittal memoranda which list the various documents provided to the Committee by PG&E since your last public meeting in June 2025.

RECOMMENDED COMMITTEE ACTION: As appropriate

2025 – 2026 (36th Annual Report)

July 21-22, 2025, Fact-finding Meeting (PFP, RFW) (AR Exhibit D.1)

1. Reactivity Management Program Update
2. Operating Experience Program Update
3. Maintenance Rule Functional Failures
4. Meeting with Nuclear Regulatory Commission Senior Resident Inspector
5. Auxiliary Building Ventilation System
6. Electronic Procedures
7. Reports on 2024 Radiation Releases and Radioactive Environmental Monitoring
8. Workplace Seismic Safety
9. Artificial Intelligence Program Update
10. Plant Update
11. Independent Spent Fuel Storage Installation (ISFSI) Update

August 12-13, 2025, Fact-finding Meeting (NM, RFW) (AR Exhibit D.2)

1. PG&E Board of Directors Safety and Nuclear Oversight (SNO) Committee
2. Meeting with Officers Paula Gerfen and Maureen Zawalick
3. Safety Conscious Work Environment
4. Beyond Design Basis Accident Mitigation Guidelines - FLEX
5. Meeting with NRC Resident Inspectors
6. Electronic Procedures
7. Artificial Intelligence Update
8. Observe Plant Health Committee Meeting
9. DCISC Recommendations to PG&E
10. Single Point Vulnerability Update
11. Emergency Diesel Generator Walkdown
12. Nuclear Instrumentation Update
13. Observe FLEX Diesel Pump Test
14. Simulator Alternate Shutdown Panel

September 16-17, 2025, Fact-finding Meeting (ROS, RJB, RDM) (AR Exhibit D.3)

1. Institute for Nuclear Power Operations Mid-Cycle Assessment
2. Unit 2 Power Reductions in Response to Area Wildfires
3. Single Point Vulnerability Program
4. Spent Fuel Canister Corrosion
5. Root Cause Evaluation for Auxiliary Saltwater Pump Motor Failure
6. Refueling Outage 2R25 Update and Safety Plan
7. Transmission Systems
8. Observe Readiness Review Board Meeting
9. Station Update
10. Discussion of Seismic Review Team Recommendations
11. Meet with DCPD Senior Director
12. Emergency Diesel Generators
13. Plant Tour

October 22-23, 2025, Public Meeting (AR Exhibit B.3)

1. Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Open Issues Raised by NRC Resident Inspectors, Status of Cross-Cutting Issues Matrix, Current and Future License Amendment Requests, and Other Significant Regulatory Issues/Requests
2. Current and Future Uses of Artificial Intelligence and Other Innovative Technologies at DCPD.
3. Committee Discussion of the Potential Relevance and Implications for DCPD of the Recent Passage and Approval of California Senate Bill 53: "Transparency in Frontier Artificial Intelligence Act."
4. Report on the Results of the Continuing Work of the Seismic Review Team in Reviewing Concerns Raised Regarding the Seismic Hazard at the DCPD Site and Environs Including by Dr. Peter Bird and by Others.
5. Update by the SLO County Emergency Services & Nuclear Power Plant Program Manager Ms. Kelly Van Buren on County Emergency Services Activities, Local Nuclear Emergency Planning, and the County's Relationship with DCPD.
6. State of the Plant Update including Organizational Changes, Significant Past and Future Plant Activities, Power History, Significant Equipment Issues, Significant Human Performance Issues, Status of Preparations for Refueling Outage 2R25, and Other Station Activities
7. Decisions Made and Their Bases for Reducing Unit 2 Power in Response to Area Wildfires in July and August 2025

December 2-3, 2025, (Previously November 18-19) Fact-finding Meeting (ROS, RDM, w/LAD Remote) (AR Exhibit D.4)

1. Emergency Diesel Generator Mission Times and Operability Determination
2. Aging Management Programs
3. Reactor Vessel Embrittlement Sample Capsule B Update
4. Meet with DCPD Officers
5. Steam Generator Health
6. Meet with Licensed and Non-Licensed Operators
7. Meet with San Luis Obispo County Department of Emergency Services
8. Auxiliary Saltwater System Discharge Arrangement and FLEX Program
9. Artificial Intelligence Uses at DCPD
10. Plant Tour Inside the Radiologically Controlled Area
11. Chemistry Department
12. Meet with Nuclear Regulatory Commission (NRC) Resident Inspectors
13. Public Engagement and Outreach Programs
14. Tour of Outside Equipment Areas
15. Observe Nuclear Safety Oversight Committee Meeting (Remote)

December 15-16, 2025, Fact-finding Meeting (PFP, LAD, RFW) (AR Exhibit D.5)

1. Maintenance Department Performance
2. Containment Structure Health and Inspections
3. Time-Based Surveillance Frequency / Online Monitoring
4. Observe Notification Review Team Meeting

5. Outage Performance Review
6. Online Maintenance
7. Radiation Protection Performance Post-Outage
8. Drone Activity At and Around DCPD
9. Meet with Nuclear Regulatory Commission Resident Inspectors
10. Meet with DCPD Officer
11. Spent Fuel Canister Corrosion Update
12. Spent Fuel Canister Corrosion –Industry Study Update
13. Probabilistic Risk Assessment Program Update
14. Station Update

January 20-21, 2026, (Previously January 13-14) Fact-finding Meeting (NM, RDM) (AR Exhibit D.6)

1. Unit 1 Feedwater Heater Leak and Shutdown for Repair
2. Plant Tour
3. Boric Acid Corrosion Control Program
4. Emergency Preparedness and Tour of Kendall Road Facilities
5. Artificial Intelligence Uses at DCPD
6. Corporate Employee Safety Culture
7. Staffing Update
8. Meet with DCPD Officers
9. Use of Common Cause Evaluations in the Corrective Action Program
10. Reactor Vessel Embrittlement Sample Capsule B Update
11. Station Update
12. Meet with Nuclear Regulatory Commission (NRC) Resident Inspectors
13. Safety-Security Interface
14. Quality Verification Program

February 18-19, 2026, Public Meeting (AR Exhibit B.6)

1. State of the Plant Update Including Organizational Changes, Significant Past and Future Plant Activities, Power History, Results of Refueling Outage 2R25, Significant Equipment Issues including Unit 1 Feedwater Heater Leak, Significant Human Performance Issues, and Other Station Activities since the DCISC's October 2025 Public Meeting.
2. Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Open Issues Raised by NRC Resident Inspectors, Status of Cross-Cutting Issues Matrix, Current and Future License Amendment Requests, and Other Significant Regulatory Issues/Requests.
3. Update on Planning for Extended Operations including Status of License Renewal, State and Local Permitting, Project Planning, and Staffing.
4. PG&E Evaluations of and Response to Recommendations Made by the DCISC's Seismic Review Team Included as Recommendations SRT-1 through SRT-9 in the DCISC's 35th Annual Report.
5. Committee Discussion on PG&E's Response to DCISC 35th Annual Report on the Safety of Diablo Canyon Operations; July 1, 2024 – June 30, 2025, including a discussion with

the DCISC Seismic Review Team of PG&E's response to Recommendations SRT-1 through SRT-9.

March 18-19, 2026, (Previously March 11-12) Fact-finding Meeting (ROS, LAD) (AR Exhibit D.7)

April 13-14, 2026, (Previously April 22-23) Fact-finding Meeting (NM, RDM) (AR Exhibit D.8)

May 6-7, 2026, Fact-finding Meeting (PFP, LAD) (AR Exhibit D.9)

June 16-17, 2026, Public Meeting (AR Exhibit B.9)

2026 – 2027 (37th Annual Report)

July 7-8, 2026, (Previously July 14-15) Fact-finding Meeting (PFP, RDM) (AR Exhibit D.1)

July 28-29, 2026, (Previously August 11-12) Fact-finding Meeting (NM, LAD, RFW) (AR Exhibit D.2) *includes observation of Emergency Preparedness Exercise (unevaluated)*

September 1-2, 2026, (Previously September 15-16) Fact-finding Meeting (ROS, RDM) (AR Exhibit D.3) *includes observation of Emergency Preparedness Exercise (evaluated)*

October 20-21, 2026, Public Meeting (AR Exhibit B.3)

December 2-3, 2026, (Previously November) Fact-finding Meeting (ROS, LAD) (AR Exhibit D.4)

December 8-9, 2026, Fact-finding Meeting (PFP, RDM) (AR Exhibit D.5)

January 20-21, 2027, Fact-finding Meeting (NM, LAD) (AR Exhibit D.6)

February 17-18, 2027, Public Meeting (AR Exhibit B.6)

March TBD, 2027, Fact-finding Meeting (ROS, RDM) (AR Exhibit D.7)

April TBD, 2027, Fact-finding Meeting (NM, LAD) (AR Exhibit D.8)

May TBD, 2027, Fact-finding Meeting (PFP, RDM) (AR Exhibit D.9)

June TBD, 2027, Public Meeting (AR Exhibit B.9)

DCPP Key Dates

NSOC Meetings (DCISC invited only to the two-hour exit meeting on the final days below)

- December 8, 2025 (Exit Mtg: 12/11/25) – *ROS observed as part of 12/2/25 FFM*

- February 23, 2026 (Exit Mtg: 2/26/26) – *NM to observe as part of 4/22/26 FFM*
- July 13, 2026 (Exit Mtg: 7/16/26) – *PFP to observe as part of 7/8/26 FFM*
- November 30, 2026 (Exit Mtg: 12/3/26) – *ROS to observe as part of 12/3/26 FFM*

Refueling Outages

- 2R25 – October 2025 (complete)
- 1R26 – Fall 2026
- 2R26 – Spring 2027

Emergency Preparedness Exercise

- July 29, 2026 (State Participation Exercise, Unevaluated) – *NM to observe as part of 7/28/26 FFM*
- September 2, 2026 (State Participation Exercise, Evaluated) – *ROS to observe as part of 9/1/26 FFM*

Abbreviations

Members: PFP=Per Peterson, NM=Najmedin Meshkati, ROS=Raluca Scarlat
 Technical Consultants: RFW=Ferman Wardell, RDM=Rick McWhorter, LAD=Lisa Darden

September
List of Documents Transmitted Electronically

2025

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
9/3/2025	DCL-25-073	Nuclear Material Transaction Report for New Fuel, shipment 7n8
9/10/2025	DCL-25-075	Nuclear Material Transaction Report for New Fuel, shipment 9
9/10/2025	DCL-25-070	Owner's Activity Report for Unit 1 Twenty-Fifth Refueling Outage
9/10/2025	DIL-25-004	Submittal of Diablo Canyon Independent Spent Fuel Storage Installation Updated Final Safety Analysis Report, Revision 11
9/24/2025	DCL-25-076, DIL-25-005	Annual Review of the Emergency Action Levels, County
9/24/2025	DCL-25-077, DIL-25-006	Annual Review of the Emergency Action Levels, State
9/25/2025	DCL-25-062	Supplement to Revised Steam Generator Tube Inspection Report for Diablo Canyon Power Plant Unit 2 Twenty-First Refueling Outage

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
9/15/2025	20250915, DCPD - FIRE PROTECTION TEAM INSPECTION REPORT 05000275_2025010 AND 05000323_2025010
9/29/2025	DCPD U1 and U2 ACCEPTANCE OF REQUESTED LICENSING ACTION RE: ADOPTION OF EMERGENCY ACTION LEVEL SCHEME PURSUANT TO NEI 99-01, REVISION 7, DEVELOPMENT OF EMERGENCY ACTION LEVELS FOR NON-PASSIVE REACTORS" (EPID L-2025-LLA-0139)

D. NSOC/PSRC Documents (NSOC/PSRC Minutes)

Date	Doc. No.	Title
8/21/2025		Nuclear Safety Oversight Committee Field Notes Diablo Canyon NSOC Meeting 2025-02
8/21/2025		Nuclear Safety Oversight Committee Chairman's Report Diablo Canyon NSOC Meeting 2025-02
9/9/2025	2025-013	PSRC Meeting No. 2025-013
9/23/2025	2025-014	PSRC Meeting No. 2025-014
9/29/2025	2025-015	Special PSRC Meeting No. 2025-015

September
List of Documents Transmitted Electronically

2025

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
1 WGE	SAPN	
2 WGE	51227069	DA-DUNC C-9/P-9 TS B3.3.1 Discrepancy
2 WGE	51234539	DA-Track Alternative Measure to 73.55(i)
2 WGE	51277137	DA- E-2 will not shut down (42X-1H-48)
2 WGE	51296532	DA-Ann. Gamma Spec. Printouts not Comple
2 WGE	51288238	DA-QAAF - Vulnerability Evaluations
Eff. Eval		
9/30/2025		Significance Level 1 and 2 Work Group Evaluations Created 09-01-2025 –09-30-2025
09/30/2025		List of DN 5.1 and 5.2 Created 09-01-2025 – 09-30-2025
09/30/2025		DCPP 1 WGE and 2 WGE Notifications Completed 09-01-2025 – 09-30-2025
09/02/2025		20 Oldest Non-LTCA DA Notifications as of 09-02-2025
9/2/2025		DCPP CAP Station Index as of 09-02-2025

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
9/3/2025		Nuclear Quality Digest, September 2025
9/8/2025		Quality Verification Assessment 2025-AS-4 Review of the PTLR Update
9/8/2025		Quality Verification Assessment 2025-AS-8 Review of the COLR for Unit 1, Cycle 26
9/15/2025		Quality Verification Assessment 2025-AS-6 Review of Owner Acceptance of Design Products

September
List of Documents Transmitted Electronically

2025

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel Report for this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
10/11/2025	BNHI51271996	Benchmark FRP TAC Meeting Winter 2025
10/02/2025	FSA51241323	Self Assessment IER-17-9 - Maintenance
10/03/2025	QHSA51297858	QHSA - Work Verification Program
10/09/2025	BNHI51292315	Benchmarking License Renewal Task Force
10/11/2025	BNHI51251345	ILT Supervisor conference benchmarking
10/11/2025	FSA51285455	Rad Effluents Formal Self Assessment
10/11/2025	BNHI51277895	Benchmark 2025 NIRMA Symposium
10/11/2025	BNHI51288356	2025 CMBG Benchmarking
10/11/2025	QHSA51254161	QHSA: Operations Clearance and Tagging
10/11/2025	QHSA51276206	QHSA for Rigging Program
10/11/2025	BNHI51271098	CONTE Benchmarking Report

I. Performance Information (PPIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
12/12/2024		2025 Nuclear Generation, Roadmap to Generating Excellence
12/12/2024		2025-2030 Strategic Plan Nuclear Generation
Station Initiative		There are no new Station Initiatives for this month.

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODM		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

September
List of Documents Transmitted Electronically

2025

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

N. Miscellaneous

Date	Title
	There are no miscellaneous documents for this month.

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	Week 2025XX	T+1 Performance Critique
	Week 202534	T+1 Performance Critique
	Week 202535	T+1 Performance Critique
	Week 202536	T+1 Performance Critique
	Week 202537	T+1 Performance Critique
	Week 202538	T+1 Performance Critique
	August	T+1 Monthly Performance Critique 2531-2535

October
List of Documents Transmitted Electronically

2025

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
9/29/2025	2025-001	DCPP Load Rejection

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
10/7/2025	DCL-25-082	Material Status Report for Period Ending August 31, 2025
10/15/2025	DCL-25-085	Diablo Canyon Units 1 and 2 - 3Q2025 - PI Data Elements (QR)

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title

D. PSRC Documents (NSOC/PSRC Minutes)

Date	Doc. No.	Title
10/28/2025		Plant Staff Review Committee, PSRC Members/Alternates
10/14/2025	2025-016	- E-Plan Section 5 Rev 5.02 - E-Plan Section 7 Rev. 5.05
10/31/2025	2025-017	- PRA 25-06, Rev 0 - Ready for Restart

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
1 WGE	SAPN	
2 WGE	51305017	DA-Eng Procedure Use and Adherence Trend
2 WGE	51289615	DA-System 17B (ASW) - U1 MR Goal Setting
2 WGE	51279233	DA-QAAF – CGD at Installation
2 WGE	51294652	DA-Trend Cyber CAP Performance
Eff. Eval	51196367	Effectiveness Eval Ops OJT in Trng Labs
10/31/2025		Significance Level 1 and 2 Work Group Evaluations Created 10-01-2025 – 10-31-2025
10/31/2025		List of DN 5.1 and 5.2 Created 10-01-2025 – 10-31-2025
10/31/2025		DCPP 1 WGE and 2 WGE Notifications Completed 10-01-2025 – 10-31-2025
11/10/2025		20 Oldest Non-LTCA DA Notifications as of 11-10-2025
11/10/2025		DCPP CAP Station Index as of 11-10-2025

October
List of Documents Transmitted Electronically

2025

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
10/01/2025		Nuclear Quality Digest, October Edition 2025

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel Report for this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
	QHSA-51276208	QHSA for Coatings Special Processes
	BNHI-51306247	Benchmark - PVNGS SRO Audit Exam Perf
	BNHI-51275975	Vogtle Informal Benchmark
	BNHI-51277978	EPRI TSUG 25 Benchmarking (Transformer)
	BNHI-51289638	Benchmark - St. Lucie STP ISFSI
	BNHI-51295016	Benchmarking - NITSL 2025 Conference
	BNHI-51277927	Benchmark 2025 PPA Conference
	BNHI-51292916	Informal Benchmark - DWC NPUG
	QHSA-51299019	Quick Hit Self-Assessment on PSEMS
	QHSA-51174473	2025 DFMP Self Assessment per DF1.ID1

I. Performance Information (PPIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
12/12/2024		2025 Nuclear Generation, Roadmap to Generating Excellence
12/12/2024		2025-2030 Strategic Plan Nuclear Generation
10/31/2025		October 2025 PI Status Summary
Station Initiative		There are no new Station Initiatives for this month.

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODM		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

October
List of Documents Transmitted Electronically

2025

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

N. Miscellaneous

Date	Title
	There are no miscellaneous documents for this month.

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	Week 202539	T+1 Performance Critique
	Week 202540	T+1 Performance Critique
	Week 202541	T+1 Performance Critique
	Week 202542	T+1 Performance Critique
	Week 202543	T+1 Performance Critique
	Week 202544	T+1 Performance Critique
	September	T+1 Monthly Performance Critique 2536-2539
	October	T+1 Monthly Performance Critique 2540-2543

November
List of Documents Transmitted Electronically

2025

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
11/5/2025	DCL-25-086	Proposed Revision to the Quality Assurance Program
11/26/2025	DCL-25-078	Supplement to License Amendment Request 24-05 Revision to Technical Specifications to Adopt Risk-Informed Completion Times TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b"

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title

D. NSOC/PSRC Documents (NSOC/PSRC Minutes)

Date	Doc. No.	Title
11/19/2025		Response to Site Visit Report, June 23 – June 26, 2025
11/20/2025	2025-019	PSRC Meeting Minutes 2025-019

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
1 WGE	SAPN	
2 WGE	51305877	DA-JW Pumps not Replaced per ENG.8
2 WGE	51293786	DA-12kV U2 Relay MP Deactivated Incorre
2 WGE	51287842	DA-QAAF - CSIR Training
2 WGE	51232777	DA-STP M-3B Pre-conditioning
Eff. Eval		
11/30/2025		Significance Level 1 and 2 Work Group Evaluations Created 11/01/2025-11/30/2025
11/30/2025		List of DN 5.1 and 5.2 Created 11/01/2025-11/30/2025
11/30/2025		DCPP 1 WGE and 2 WGE Notifications Completed 11/01/2025-11/30/2025
12/02/2025		Open LTCA DA Notifications Station Significance 3 as of 12/02/2025
12/02/2025		Open RCEs as of 12/02/2025
12/02/2025		Open LTCA DA Notifications Station Significance 1 & 2

November
List of Documents Transmitted Electronically

2025

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
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G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel Report for this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
	BNHI-51254199	Assess ESP Mentor Qual Requirements
	BNHI-51272591	Everbridge OE

I. Performance Information (PPIR, Operating Plan, Station Initiatives)

Date	Doc. No.	Title
12/12/2024		2025 Nuclear Generation, Roadmap to Generating Excellence
12/12/2024		2025-2030 Strategic Plan Nuclear Generation
11/30/2025		Final Status Summary November 2025
Station Initiative		There are no new Station Initiatives for this month.

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODM		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

N. Miscellaneous

Date	Title
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November
List of Documents Transmitted Electronically

2025

	There are no miscellaneous documents for this month.
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O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	Week 202545	T+1 Performance Critique
	Week 202546	T+1 Performance Critique
	Week 202547	T+1 Performance Critique
	Week 202548	T+1 Performance Critique
	November	T+1 Monthly Performance Critique 2544-2448

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**AGENDA TRANSMITTAL FORM****MEETING DATE:**

February 18, 2026

AGENDA ITEMS:

VI-N & XII-C, D

AGENDA TITLE:

Consultant Reports; Receive, Approve and Authorize Transmittal of Fact Finding Reports.

CONSENT []**ACTION [X]****INFORMATION [X]**

Staff Summary: It is expected that oral and written reports will be presented at the meeting by Technical Consultants Mr. McWhorter, Ms. Darden and Mr. Wardell. These reports may be received by the Committee, approved as to form and content and be authorized for transmittal to PG&E for its consideration and response. The Committee reserves the right to revise any fact finding report prior to its inclusion in an Annual Report. Fact finding reports in their final “as approved form” become a part of the DCISC’s next Annual Report. These reports will be included in the DCISC’s 36th Annual Report for the period July 1, 2025 - June 30, 2026.

Fact Finding Reports are posted on the Committee’s website at www.dcisc.org prior to a public meeting and made available for public inspection immediately following their approval by the Committee at a public meeting

RECOMMENDED COMMITTEE ACTION:

Receive and approve reports by Consultants and Members and approve resolutions certifying approval concerning fact-finding conducted on December 2-3 and December 15-16, 2025 and January 20-21, 2026 [Resolutions 2026-01 through 2026-3].

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	February 18, 2026
AGENDA ITEM:	XIII
AGENDA TITLE:	Minutes of October 22-23, 2025 Public Meeting
CONSENT [] ACCEPTANCE [X] INFORMATION []	

Staff Summary: Attached are the Minutes which have been prepared from the Committee's one hundred and twelfth public meeting held on October 22-23, 2025, in Avila Beach, CA and as a Zoom webinar.

(Each session was also webcast live in real time and is available for subsequent viewing, archived to the meeting agenda, by visiting the links on the Committee's website at www.disc.org or at www.slospan.org. Meetings are videotaped for later broadcast on Channel 21 in the San Luis Obispo, CA area, the governmental access television channel.)

RECOMMENDED COMMITTEE ACTION: Review and accept the Minutes by motion.

MINUTES
of the
DIABLO CANYON INDEPENDENT SAFETY COMMITTEE'S
OCTOBER 22-23, 2025, PUBLIC MEETING
[For Approval at the February 18-19, 2026, Public Meeting.]

Wednesday & Thursday
October 22-23, 2025
Avila Beach, California
Also conducted as a Zoom Webinar

Notice of Meeting.

A legal notice of the public meeting was published in the San Luis Obispo Tribune and a display advertisement was published in the New Times, both local newspapers of general circulation, and mailed and emailed to the media and those persons on the Committee's mailing list. The meeting agenda and the complete agenda packet for the meeting and the informational presentations made during the meeting together with the fact finding reports and reports of the Seismic Review Team to be considered for approval were posted on the Committee's website at www.dcisc.org prior to the meeting. The meeting agenda contained information on how to access the webinar using a computer or cellphone/telephone. This in-person meeting was also produced as a Zoom webinar by AGP Video, Inc. and was webcast live on SLO-SPAN at <http://www.slo-span.org> and through <http://www.dcisc.org> and was subsequently broadcast on San Luis Obispo, California, local government access television Channel 21. A supply of hand sanitizers and face coverings was available in the meeting room.

I CALL TO ORDER - ROLL CALL

The October 22, 2025, public meeting of the Diablo Canyon Independent Safety Committee (DCISC), the one hundred and twelfth public meeting of the Committee, was called to order by Committee Chair Dr. Per F. Peterson at 9:00 a.m. Dr. Peterson briefly reviewed the professional backgrounds and appointment to the DCISC for each of his fellow Members, Dr. Najmedin Meshkati, the appointee of the Chair of the California Energy Commission and Professor of Civil Environmental Engineering, Industrial and Systems Engineering and International Relations at the University of Southern California encompassing risk reduction, reliability enhancement and human factors, and Dr. Raluca O. Scarlat, a new member of the Committee and a Professor of Nuclear Engineering with research area in chemistry and reactor safety at the University of California at Berkeley, the appointee of the California Attorney General. Dr. Peterson serves on the DCISC as the appointee of the Governor and is a Professor at the University of California at Berkeley in the Department of Nuclear Engineering, holding the William and Jean McCallum Floyd Chair in the Department, and Dr. Peterson is the Chief Nuclear Officer and co-founder of Kairos Power, an American nuclear energy company that develops fluoride salt-cooled high temperature reactors, also known as molten-salt reactors, a type of small modular reactor.

Present: Committee Member Najmedin Meshkati
Committee Member Per F. Peterson
Committee Member Raluca O. Scarlat

Absent: None

II INTRODUCTIONS

Dr. Peterson introduced and briefly reviewed the professional backgrounds of the Committee's Technical Consultants and Assistant Legal Counsel present: Technical Consultants Mr. R. Ferman Wardell, P.E, Mr. Richard D. McWhorter Jr., Ms. Lisa A. Darden who is attending her first public meeting as a Technical Consultant and he reported Ms. Darden has spent 35 years in the nuclear power industry working at Dominion Energy at Dominion's Surrey and North Anna Power Stations, most recently as Site Vice President at Surrey, and DCISC Assistant Legal Counsel Mr. Robert W. Rathie.

Dr. Peterson remarked that much of the recent work of the Committee has been monitored and observed by the California Department of Water Resources (DWR) and he recognized the presence in the audience of Ms. Delphine Hou, Deputy Director for Statewide Energy, and Ms. Harpreet Bhalla, Senior Control Engineer Supervisor at DWR.

Dr. Peterson then introduced Mr. Tom Jones, PG&E Senior Director of Strategic Initiatives and Senior Director for Regulatory, Environmental and Repurposing, Ms. Brandy Lopez, Strategic Initiatives Licensing Principal, and Ms. Carina Corral, Strategic Initiatives Manager. Dr. Peterson reported that all three perform key roles on behalf of PG&E and Diablo Canyon Power Plant (DCPP or sometimes the Plant) as the principal liaisons with the DCISC in coordinating the Committee's activities, providing information, and facilitating the Committee's public meetings and the frequent fact-finding visits conducted by a single member and one of the technical consultants.

Dr. Peterson recognized the presence for this meeting of Dr. Robert J. Budnitz, who served as a member of the Committee for 18 years as the appointee of the California Attorney General, and Dr. Thomas H. Jordan who has led and participated in the work of the Committee's Seismic Review Team.

Dr. Peterson recognized the presence of the technicians from AGP Video, Messrs. Ray Sanchez, James McRoberts and Nate Brennen, and Mr. Rathie reported this meeting is being livestreamed and broadcast on the internet and he welcomed the technicians for AGP Video who provide this component of the Committee's public meetings.

III PUBLIC COMMENTS AND COMMUNICATIONS

Dr. Peterson requested Mr. Rathie to review the guidance on making public comments to the Committee. Mr. Rathie reminded the members and consultants of the importance of exercising discipline in making and responding to comments so that an accurate transcript may

be produced. He then reviewed the rules adopted to entertain public comment during each session of this meeting on an equitable basis for all as follows:

- Speakers should come to the podium and identify themselves.
- Speakers will be recognized by the Chair in order, first from among those present in the room and then from among those attending virtually.
- Remarks will be limited to four minutes, but this may be varied for each session,
- Comments from public officials may be taken before those of members of the general public.
- Speakers may not cede their time to other speakers.
- Groups may be asked to appoint a spokesperson.
- Each speaker may only address the Committee once under either time for items not on the agenda, but within the Committee's subject matter jurisdiction (i.e., the operational safety of DCPD) or when a matter listed on the agenda is heard.
- The DCISC Chair reserves the right to stop any speaker if he or she believes the speaker is out of order.
- The Committee reserved the right to modify the rules in the interest of conducting an effective meeting including granting extra time to certain speakers upon request,
- Writings used in conjunction with remarks should be provided to the Committee's Legal Counsel.
- Email comments received will be read into the record subject to a time limit.

The Chair invited the members of the public who wished to address remarks to the Committee on items not appearing on the agenda for the public meeting to do so at this time.

Dr. Gene Nelson, President and Senior Legal Researcher for Californians for Green Nuclear Power (Californians for Green Nuclear Power) was recognized. Dr. Nelson requested the inclusion in the records of the Committee of Californians for Green Nuclear Power's October 20, 2025 filing with the California Public Utilities Commission (CPUC) and an article by Californians for Green Nuclear Power of August 14, 2025, both which were provided to the Committee previously by email.

Dr. Nelson reported relative to an item on the Committee's Open Items List on the potential adverse effect on the Plant of a blackout affecting offsite power supply. He stated DCPD's 230kV power supply must pass through the Morro Bay switchyard, but the 500kV lines which normally carry DCPD power output provide three redundant pathways which can also be used to bring offsite power to DCPD. Dr. Nelson reported during the local Gifford Fire as a consequence of soot and smoke two of the three 500kV lines were out of service for some time period, but as the one remaining line, which usually transmits 33% of DCPD power output, did not traverse the burn area it was able to safely transmit approximately 73% of DCPD power output. Mr. McWhorter commented these topics would be addressed later during this meeting.

Ms. Jane Swanson a spokesperson for San Luis Obispo Mothers for Peace was recognized. Ms. Swanson stated her group would welcome the opportunity for representatives of the Mothers for Peace Board of Directors to meet informally with Dr. Scarlat to discuss their

concerns and to understand Mothers for Peace’s advocacy for shutting down DCP. Dr. Scarlet stated she would welcome a meeting as suggested by Ms. Swanson.

IV A. Public Outreach, Site Visits other Committee Activities, Scheduling and Confirmation of Future Fact Finding Visits and Public Meetings.

Mr. McWhorter reported there are several proposed changes to the scheduling and assignments made at the June 2025 public meeting and these include proposing a rotation of all three consultants such that each will have one fact finding between public meetings and a rotation which will allow each technical consultant to conduct a fact finding with a different member. Members and consultants then discussed and confirmed future public meetings of the DCISC for: February 18-19, 2026, June 16-17, 2026, October 20-21, 2026, and the members and consultants then scheduled a public meeting for February 17-18, 2027.

Fact-finding visits were then confirmed, subject to confirmation by DCP that the plant can support visits on the selected dates, and scheduled as follows¹:

[2025] December 2-3 – remote NSOC exit meeting on December 11 [previously November 18-19] (ROS, RDM, LAD) December 15-16 (PFP/LAD/RFW); and for

[2026] January 20-21 [previously January 13-14] (NM/RDM), March 18-19 [previously March 11-12 and 10-11] (ROS/LAD), April 13-14 (NM/RDM) [previously April 14-15 and April 22-23], May 6-7 (PFP/LAD), July 7-8 [Previously July 14-15] (PFP/RDM), July 28-29 – observer unevaluated Emergency Exercise [previously August 11-12] (NM/LAD), September 1-2 – observe evaluated Emergency Preparedness Exercise on September 2 [previously September 15-16] (ROS/RDM), December 2-3 observe NSOC exit meeting [previously November 30 – December 1] (ROS/LAD), December 8-9 (PFP/RDM)

[2027] January 20-21 (NM/LAD).

V A. INFORMATION PRESENTATIONS REQUESTED BY THE COMMITTEE OF PG&E.

DCP Director Mr. Tom Jones introduced DCP Director of Risk and Compliance Mr. Jordan Tyman for an update on DCP regulatory performance. Mr. Jones reported the Mr. Tyman is responsible for oversight of the nuclear regulatory and compliance program, enterprise and operational risk management, innovation, nuclear cyber security and emergency planning. Mr. Tyman has been employed by PG&E for nine years and spent ten years prior to coming to PG&E at Westinghouse Electric Corporation in support of the development of Westinghouse’s AP1000 pressurized water reactor and with a number of Westinghouse’s subsidiaries. Mr. Jones reported that Mr. Tyman has various academic partnerships and holds memberships on numerous industry committees and a Degree in Mechanical Engineering from the University of Massachusetts.

¹ (Lisa A. Darden (LAD), Najmedin Meshkati (NM), Per F. Peterson (PFP), Richard D. McWhorter (RDM), R. Ferman Wardell (RFW), Raluca O. Scarlet (ROS). Meeting dates have been updated to include changes made after the October public meeting.

Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Open Issues Raised by NRC Resident Inspectors, Status of Cross-Cutting Issues Matrix, Current and Future License Amendment Requests, and Other Significant Regulatory Issues/Requests.

Mr. Tyman reported that since the last meeting of the DCISC in June 2025, the oversight of DCPD by the federal Nuclear Regulatory Commission (NRC) has included approximately 2,000 hours of inspection time including by the two full-time resident inspection team. During this period DCPD received no violations. He reported DCPD continues to remain in the highest performance categories measured against the NRC's sixteen identified Performance Indicators with all indicators in Green status². During this period DCPD did not initiate any Licensee Event Reports (LERs). Mr. Tyman reported the NRC inspection to support the Operator License Exam program is the single NRC inspection remaining for 2025.

Mr. Tyman reported the NRC has been reviewing several License Amendment Requests (LARs) and has approved LARs for online monitoring to enable the use of Analysis and Measurement Services Corporation's methodology to inform time-based surveillance frequency requirements, calibrations for channels and reviewing frequency requirements based on performance and data gathered, and for optimized zero fuel cladding. Dr. Peterson observed online monitoring can relate directly to operational safety and he directed that this topic be scheduled for a future fact finding. Mr. Tyman stated DCPD has submitted a number of LARs to review Technical Specification³ (TS) requirements including TS completion time for the Auxiliary Building Ventilation System, as well as an LAR to refine Emergency Action Levels (EAL) in accordance with Nuclear Energy Institute (NEI) publication NEI-99-01 Rev 7. In response to Mr. McWhorter's questions Mr. Tyman described NEI-99-01 Rev 7 as having a streamlining effect by changing and consolidating EAL and the EAL process to make it more effective and easier for operators to use. Mr. Tyman reported that future LARs are planned for updates to the E Plan [Radiological Emergency Preparedness Plan?] to bring it up to current industry and NRC standards using NUREG-0654 Rev. 2 guidance⁴ which is Federal Emergency Management Agency (FEMA) approved.

In response to Dr. Meshkati's inquiry Mr. Tyman reported the meeting previously scheduled with the Advisory Committee on Reactor Safeguards (ACRS) was cancelled by the federal government and the federal government has not yet completed its review, and a license extension for DCPD is currently awaiting state action by the California Coastal Commission and the Regional Water Quality Control Board which when complete will close the environmental

² The safety significance characterizations used for the Performance Indicators as either Green (very low), qualifies for Baseline inspection; White (low to moderate), requires additional NRC oversight; Yellow (substantial), requires more NRC oversight; or Red (high), requires most NRC oversight. A Green non-cited violation indicates very low safety significance, with no impact to public health and safety.

³ As part of an NRC license authorizing operation of a nuclear facility, Technical Specifications establish requirements for items such as safety limits, limiting safety system settings, limiting control settings, limiting conditions for operation, surveillance requirements, design features, and administrative controls.

⁴ The NRC's NUREG-series publications consist of reports or brochures on regulatory decisions, results of research, results of incident investigations, and other technical and administrative information.

track for the license extension. He stated DCPD expects the NRC to act within 90 days of the completion of state action. Concerning the government shutdown, in response to Consultant McWhorter's query Mr. Tyman reported that the NRC resident inspection team remains active and onsite to conduct oversight and inspections and the upcoming license examination remains supported by the NRC, but some actions by NRC headquarters such as those concerning LARs have been paused.

A short break followed.

Mr. Jones stated that Mr. Tyman would continue with the next presentation on the topic of artificial intelligence as Mr. Tyman in his role supervising cyber security has oversight of DCPD's integration of innovative technology for regulatory compliance and operations.

Current and Future Uses of Artificial Intelligence and Other Innovative Technologies at DCPD.

Mr. Tyman reported DCPD has now partnered with the Atomic Canyon, an artificial intelligence (AI) firm located in San Luis Obispo focused on the use of AI in the nuclear industry and has implemented Atomic Canyon's Neutron search tool which has been trained on nuclear documentation including through the NRC's ADAMS database.⁵ He described Neutron search as essentially an enhanced Google-type search engine that allows users to find information quickly and to integrate with more than eight document management systems in use at DCPD. This allows engineers and other plant staff more time to focus on technical problem solving, innovation, and improving safety and reliability. Mr. Tyman confirmed Dr. Peterson's observation that the training data for Neutron search is limited to ADAMS documentation, plant documentation, and other types of nuclear information which would normally be searched in the absence of AI and does not interface with the internet and therefore does not "hallucinate"⁶ based on extraneous information.

Mr. Tyman confirmed Dr. Meshkati's observation that Neutron search is an augmented search function enabling a search of 5,000,000 pages of documents. He stated that anchoring AI in regulatory and station documents ensures that high quality generative or augmented summaries are available to engineers. In response to Dr. Scarlat's question Mr. Tyman reported Neutron search is used by plant staff across the station for gathering documents for tasks such as design changes, design documents, work packages, and to inform decision making but it is not used to make decisions and he concurred with Dr. Scarlat that this use follows the general engineering practices of accessing source data and making sure a decision is supported by primary not secondary data. In response to Dr. Scarlat's question as to training, Mr. Tyman

⁵ The Agencywide Documents Access and Management System (ADAMS) is the official recordkeeping system, through which the U.S. Nuclear Regulatory Commission (NRC) provides access to the following "libraries" or collections of publicly available documents.

⁶ AI hallucination occurs when a generative AI produces false, nonsensical, or fabricated information that seems plausible but isn't grounded in reality, including making up facts, sources, or events, often stemming from patterns in its training data rather than factual understanding, posing risks in high-stakes areas like nuclear. This can happen due to data biases, overfitting, or simply the model generating statistically likely but factually incorrect sequences, requiring careful human fact-checking and critical evaluation of AI outputs.

reported the augmented summaries are very simplistic and insufficient to make an engineering decision, but they are sufficient to know if there is a document that provides value for further evaluation.

Mr. Tyman reported training was provided to all users to reinforce the foundations of the AI tool and also its limitation and he reported administrative controls have not changed and all regulatory requirements are being followed. In response to Dr. Scarlat's question Mr. Tyman replied that while use of available AI tools is not required, their use allows personnel to use their time to focus on moving from administrative tasks to problem solving, field work, health system reports, and design changes. He acknowledged the existence of generational capabilities and that some personnel will continue to follow existing processes. In response to Dr. Peterson's query as to the interface between DCPD AI tools and others which might be available to DCPD or PG&E in general Mr. Tyman replied that Neutron search is a stand-alone product not interconnected with Co-Pilot, Microsoft's AI application used at PG&E. Mr. Jones mentioned AI-supported cameras have been widely employed by PG&E and have proven useful in identifying transmission irregularities including from wildfire. Dr. Peterson observed that having the AI tools related to nuclear safety compartmentalized makes sense, but it is important for PG&E to find how to use these tools more broadly for applications. Mr. Tyman reported at DCPD the use of AI is subject to robust IT and cyber security controls and follows all NRC regulatory guidance and industry standards and all decision making remains with humans.

Mr. Tyman reported that DCPD is focused on learning how to use Neutron search including development of forms to support procedure changes or training and gathering information, but none of this has been deployed or developed at the site. **Dr. Peterson reported the Committee is considering how additional opportunities could be identified where the application of AI could affect the goal of improved operational safety and it would be good for the Committee to identify future use cases, as in the future the DCISC is likely to recommend that PG&E pursue certain of them as there is an opportunity cost not to proceed expeditiously.**

Dr. Budnitz stated development work on AI in the nuclear industry has been ongoing for some years and he called the attention of the Committee to the International Atomic Energy Agency's (IAEA) report "Consideration for Deploying AI in the Nuclear Industry" which Dr. Budnitz stated identified both opportunities and real problems. Dr. Meshkati commented that the Committee has received the report cited by Dr. Budnitz, as well as several others and he has reviewed the experience of AI applications in other industries and has some concerns.

Mr. Tyman stated with respect to electronic procedures, referred to as Dynamic Instructions (DI), DCPD has been and is currently pursuing transitioning procedures from paper with detailed work steps into DI which he described as a workflow based model. He remarked that this is intended to streamline procedures and reduce or prevent human error and to guide in proceeding from one procedural step to the next. He reported DI allows reference documents to be electronically accessed in the field and uploaded and integrated into procedures and allows for a more efficient use of procedures and processing through the records management system. He reported implementation of DI is still in the pilot project stage, confined so far to use on

operator's rounds, and DCPD is benchmarking⁷ this initiative with other NRC licensees. He reported the next steps include growing the scope of procedures to be translated into DI and development of DI work packages.

Dr. Peterson observed the implementation of DI relates to a specific DCISC recommendation and he observed electronic procedures will introduce new ways for errors to occur and in the way DCPD approaches this pilot project it is important to identify these at an early stage. He remarked that the overall implications of DI are highly positive. In response to Dr. Meshkati's request Mr. Tyman reported initial training and classroom use of the tool involving frontline plant staff and has incorporated their feedback. He reported at this time the DI packages are mainly dialog-based, that is, without animation or visualization aspects. He reported DCPD is exploring connecting training videos into the DI packages. At this time in the field both paper and DI procedures are being used and post review feedback is conducted which he stated has been largely positive. In response to Consultant McWhorter's question Mr. Tyman stated DI procedures can be used without WiFi but having WiFi provides added value including the ability to geofence around equipment and he reported DCPD is evaluating the ability to enhance its WiFi capabilities in the plant.

Dr. Peterson remarked that as data is available in DI packages, AI will be a useful benefit in finding similar instances and he mused that all the ways one could modify electronic procedures make it difficult to pick between them. Mr. Tyman replied that procedures have been prioritized as to best value and from a human performance error reduction perspective and these are mainly the procedures that are used in the field and functionalities continue to be built into the pilot program which will involve flexibility and the evolution of new controls, tools, automations and human performance tools. Dr. Peterson remarked experienced plant operators can sometimes sense when something is amiss with equipment and Mr. Tyman stated an Operating Experience (OE) report is included now in non DI procedures and it is planned to be integrated into DI procedures.

In response to Dr. Scarlat's question as to the process required to change a procedure and how that might change with DI procedures, Mr. Tyman replied that as DI is a workflow and, like now, experienced plant staff will continue to review [procedural changes] but as developing DI workflow differs from dialogue-based workflow, enhanced training around the development and a separate qualification for the DI process is being developed. In response to Dr. Peterson's comment about the value of virtual reality tools Mr. Tyman reported that some in the nuclear industry have tested incorporating hands-free applications such as Google Glass and this might be something in the future for DCPD.

Dr. Meshkati commented that the nuclear industry, like the aviation industry, is vulnerable to maintenance-related error and he urged Mr. Tyman to explore in context of DI the lessons learned on the issue of human error reduction in maintenance in other domains. Mr. Tyman reported DCPD does look outside the nuclear industry in the context identified and he stated that he agreed with Dr. Meshkati's recommendation and DCPD shares information on

⁷ Benchmarking is the practice of comparing business processes and performance metrics to industry bests and best practices from other organizations.

NextAxiom, one of the vendor software platforms, with other nuclear plants. **In response to Consultant McWhorter’s observation about use of a video for a pre-job briefing on the tedious task of setting the actual thrust preload on an auxiliary saltwater pump motor, Mr. Tyman commented DCPD maintains a library of videos that are used not only in the routine training of operators, but also for maintenance technicians and he offered to review their use at a future fact finding.** In response to Dr. Scarlat’s inquiry as to whether DI provides a benefit in updating instructions to the workflow process Mr. Tyman replied this benefit has not yet been seen as the program is still in the pilot phase, but he observed that this is an expected result and has been observed in benchmarking. He reported that operators will have the ability to issue a Notification to make changes to the process directly through the DI program and Dr. Scarlat observed having the ability to see what a previous operators accessed concerning work under DI would likely be a likely benefit. In response to Consultant Kadak’s observation, Mr. Tyman reported DCPD is reviewing use of AI in connection with the Corrective Action Program.

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. In response to Dr. Nelson’s inquiry as to whether an audit trail is used to document use of Neutron search over time Mr. Tyman replied that the Plant’s Software Quality Assurance Program requires that when software platforms are used and are integrated with other software, the process, system, and procedure relative to that integration be documented.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman stated he attended a webinar conducted by the American Nuclear Society which identified generation of hallucinations as a principal concern with the use of AI. Mr. Jones observed the AI phenomenon known as hallucinations is not a factor for Neutron search as employed at DCPD due to the unique source of information and that the system is locked down, so as not to be able to hunt and blend different universes of information.

Dr. Ken Koves was recognized. In response to Dr. Koves’ question concerning use of Microsoft’s Copilot application Mr. Tyman reported Copilot is applied in the corporate enterprise environment and has the benefit of the IT and cyber controls and protection afforded within PG&E’s Information Technology System and is not itself a part of the nuclear system and does not have a connection to the external internet.

VI INFORMATION ITEM PRESENTED BY THE COMMITTEE

Dr. Peterson introduced Dr. Yolanda Gil, a Fellow at the Information Sciences Institute at the University of Southern California (USC) where Dr. Gil also serves as Senior Director of AI and Data Science Initiatives and Director of the Center on Artificial Intelligence.

Presentation by Dr. Yolanda Gil on Artificial Intelligence Safety Efforts in the U.S., and Committee Discussion with Dr. Gil of the Potential Relevance and Implications for DCPD of the Recent Passage and Governor’s Approval of California Senate Bill 53: “Transparency in Frontier Artificial Intelligence Act.”

Dr. Gil stated that based upon her 40-year career working in the AI field she would describe some of the considerations regarding AI safety and the recent passage of California

Senate Bill 53 (SB 53). Dr. Gil stated AI applications have been available for some time now and the different applications for which it is now available for use have been advancing rapidly. She described some of these applications:

- Decision Making – such as with bank loans, where AI is given rules and simply reasons using those rules, learns from data and gives a recommendation and a final decision is then made by a human.
- Cyberphysical Systems – such as autonomous-driving vehicles, where AI controls the operation but based on the level of autonomy a human can override the AI function. Dr. Gil observed this application requires a great amount of data.
- Foundation Models – consisting of large language/image models which learn from large amounts of data on the internet and the AI optimizes the likelihood of the generated output through very sophisticated mathematical formulas and AI in this context cannot give guarantees of its liability or quality.
- Sociotechnical Systems – such as social media sites which use AI algorithms⁸ where the algorithms decide what information is seen but the AI is not tracking the harmful network effects.

Dr. Gil reported that USC has done pioneering work in AI ethics including considering early on the safety, errors, and risks as well as the legal, ethical and societal aspects of AI systems. Over a number of years there have been many documents and reports, both narrative and quantitative addressing ethics principles for AI guidance for safety and responsible AI transparency including privacy and preserving human rights, dignity, and trust. Dr. Gil reported on her involvement with the AI Index which is published annually and is based on data concerning AI-related legislation on the regulation of AI in different states and contains an AI incident database that shows an increasing trend in reports received. She stated in 2023 the federal government created an AI Safety Institute under the National Institute of Science and Technology (NIST) to develop metrics and a framework to evaluate AI that could inform policy, which is now the Center for AI Standards and Innovation (CAISI).

Concerning the legislative mandates, Dr. Gil reported there is legislation in terms of the use of AI for decision-making and cyberphysical systems, which is mostly at the state level. For the use of AI in context of foundational models, SB 53 is the first state legislation to address requiring large model developers to report on their framework for developing the models and for an annual published review of how that framework and internal governance considers and assesses the mitigation of catastrophic risk which is provided to the Governor's Office of Emergency Services (Cal OES). In addition, she reported that there is protection in SB 53 for whistleblowers and Dr. Gil described SB 53 as flexible and stated she hopes it will be effective in terms of regulating and understanding AI and safety. She reported that most of the legislation to date has been focused on sociotechnical AI systems in terms of protecting minors.

⁸ An algorithm is a set of instructions designed to accomplish a task.

Dr. Gil stated an important point for the Committee's attention is that AI needs to be incorporated into safety engineering practices and there are methodologies and lessons learned from medical, aviation and nuclear technology in this regard. It is important to consider AI as a technology to build systems that will incorporate practices and be integrated into safety engineering practices. Dr. Gil observed AI is different and poses new challenges that safety engineering may not have considered to date, including that AI may change its behaviors due to contemporaneous learning and AI technology advances very rapidly. She stated there is a recently released consensus study by the National Academies of Sciences, Engineering, and Medicine on machine learning for safety critical applications which focuses on cyberphysical systems and identified a key paradigm⁹ shift needed to fit machine learning for safety applications using algorithms to better quantify uncertainty and to provide justifications and explanations to understand when a system is operating out of boundaries so that AI will be able to control some physical systems. A second observation from that report is the performance of foundation models falls short of safety standards.

Dr. Gil stated her recommendation and preference would be to take guidance from the NIST AI risk management framework published in 2023 which is very much focused on safety as seen in safety critical systems, identifying this in context of most importantly how the AI system is governed, then the need to map the AI into a operational context, to identify metrics measure and identify and track the risk and potential risks associated with operation, and then to manage the risk taking into account the consequences of those risks. Dr. Gil summarized by stating it is important to incorporate AI systems into existing safety engineering processes and extend that ability when needed while not necessarily waiting for AI regulation and policy. She stated it was her understanding that the NRC has a strategy for AI that incorporates the NIST AI risk management framework.

In concluding her remarks Dr. Gil stated her recommendations are to adopt and adapt the NIST AI risk management framework, to develop metrics and measures for AI systems in an operational context, to consider a combined readiness level ratings that evaluate technical systems and their maturity, and to incorporate human readiness level assessments that focus on the operator's ability to use a system so that the entire system behaves and risks are being managed as desired.

Dr. Peterson then thanked Dr. Gil for a very interesting presentation and stated he agreed on the need to review this rapidly revolving topic on a frequent basis, that is, every two or three months. Dr. Meshkati also thanked Dr. Gil and he observed that with the advance of AI technology it is impossible for any regulatory agency to keep pace. Dr. Gil acknowledged Dr. Meshkati's comment on the rapid evolution of AI and stated documentation of the different considerations identified by a monitoring body is important in that respect, as well as in the recognition that safety must be the first order of concern and bringing in safety engineering experts in the case of safety critical systems is important. Dr. Gil observed that the biomedical field has kept up with AI in terms of regulation as methodologies are available to do clinical trials and evaluation of medical devices and it is worth exploring those practices in other fields.

⁹ That is, a typical example or pattern of something.

Dr. Scarlet commented that when associations being made among data, it is important to understand the reason for those associations because they may be empirical associations that should not be there and that is another type of failure mechanism that AI tools can exhibit. She stated it is an interesting question as to how the safety culture of the AI industry will meet the safety culture of the nuclear industry. She observed that when there are instances of AI hallucination they need to be recognized and a response made. Dr. Scarlet remarked it is not that the goal is for a perfect technology, but for one for which we understand the failure modes so that a human can be prepared to respond. She observed that there is also a question of reversibility within the work processes should AI become unavailable for a period of time due to the need to address a newly discovered failure mode. Dr. Gil replied and stated that AI technology is very broad and learns from prior data on the operation of the system and those technologies can be measured in terms of their accuracy and performance against their predicted behavior of the system. Dr. Gil remarked AI is not perfect and neither are humans. AI is a technology based on experience and the term “hallucinations” is one that is used frequently for the large language models and in those cases the difficult piece is to design the workflow where the AI systems are going to operate which may include a series of AI systems and human interventions and she remarked it is those workflows that are not well understood in general in commercial organizations in the industry, but she remarked having the ability to have reversibility and to change the workflow as needed is very much the way the industry works.

Concerning SB 53, Dr. Gil stated the DCISC should be aware of and keep up to date on the reports coming from the foundation model companies about any kind of catastrophic risk. She remarked it would also be important to track how Neutron search is being used and to convey any safety concerns to the developer of the model.

Dr. Budnitz expressed his view that the manner in which DCPD uses Neutron search, that is, by searching documentation does not create a significant danger or safety hazard, but should that use expand to supporting decisions there is a potential for the dangers as described by Dr. Gil that will need to be assessed by the Plant and the NRC and also by the DCISC. He commented regarding the large language models they are based on a huge amount of information and that search area is essentially unreviewable. **He identified a second problem he termed sycophancy related to the generation of results again and again and AI gives the user what the user wants to get rather than what the user should get as a result of the AI using only a subset of information which can create an incomplete or even erroneous results. He stated he believed the ability to review those new AI failure modes is an ability the Committee does not possess and how that will be reviewed is a challenge of great importance for the DCISC.** Dr. Scarlet observed incompleteness represents a new failure mode, but with every failure mode there is a management strategy that can be developed but the starting point is to identify the different failure modes.

Dr. Peterson thanked Dr. Gil.

VII ADJOURN MORNING MEETING

The Chair adjourned the morning meeting of the DCISC at 12:03 p.m.

VIII RECONVENE FOR AFTERNOON MEETING

The afternoon meeting of the DCISC was convened by the Chair at 1:30 p.m.

IX COMMITTEE MEMBER COMMENTS

There were no comments by any members at this time.

X PUBLIC COMMENTS AND COMMUNICATIONS

XI CONSULTANT REPORT & RECEIVE, APPROVE, AND AUTHORIZE TRANSMITTAL OF A FACT FINDING REPORT TO PG&E

A. The Chair requested Consultant Mr. McWhorter to provide a summary report on the September 16-17, 2025, fact-finding visit conducted with Dr. Budnitz and Dr. Scarlet. Mr. McWhorter reported as this fact finding followed shortly after Dr. Scarlet's appointment to the DCISC, Dr. Scarlet participated remotely in a portion of this fact finding. He reviewed the topics discussed with PG&E during the September 2025 visit as follows:

➤ Institute of Nuclear Power Operations (INPO) Mid-Cycle Assessment – Consultant McWhorter reported the DCISC reviews the formal site evaluations conducted by both INPO and the World Association of Nuclear Operators (WANO) which are conducted every two years. For DCPD the last evaluation was in August 2024 by WANO. He reported WANO evaluations include international members on the reviewing teams. Mr. McWhorter stated these team evaluations will move from a two-year to a four-year cycle and will include a continuum assessment to perform continuous evaluation of a site using performance indicators and monitoring by a designated INPO representative with a formal small evaluation at the two-year interval between each four-year evaluation. Mr. McWhorter reported that between those two evaluations DCPD performs a self-assessment, one of which was recently completed to assess the status of follow-up actions and he reported two new concerns were opened during this self-assessment. Mr. McWhorter stated information resulting from INPO and WANO evaluations and the resulting self-assessments is held in strict confidence by the DCISC to ensure the independence and objectivity of the process, but the DCISC does review the information in context of the Committee's understanding of Plant performance. He reported that the DCISC Fact Finding Team (FFT) found the station satisfactorily completed the mid-cycle assessment and there were no new issues requiring follow-up by the Committee.

➤ Unit 2 Power Reductions in Response to Area Wildfires – Mr. McWhorter reported during the recent wildfires in the local area Unit 2 twice reduced power. He reported two of the 500kV lines coming into DCPD to transmit power from DCPD to the grid come from south of the Plant from the Midway Substation while one 500kV line comes from the north from the Gates Substation. Either the 500kV or the 230kV lines can transmit power to the station. He reported that a part of the transmission system is a Special Protection System (SPS) to address an analyzed condition in that grid instability could result if there were only a single 500kV line available and both units then tripped from full power. He reported that the SPS is configured such that it will not allow the station to operate on only one 500kV line with power generation

greater than 1,700MW to the grid. He reported when separate two wildfire events occurred on July 4 and August 4, 2025 respectively which threatened and in one case eventually resulted in deenergizing of the two 500kV lines from the Midway Station. Unit 2 power was reduced over a period of several hours to less than 47% to generate less than 1,600MW such that if both 500kV lines were lost neither DCP unit would trip¹⁰ automatically. Mr. McWhorter reported the decision to reduce power was made in concert with the PG&E Grid Control Center and the PG&E Transmission organization which has a Hazard Awareness Warning Center and there will be a presentation later on this topic at this meeting. Mr. McWhorter reported there were no issues in power reduction or power ascension for Unit 2. The FFT concluded the station twice took action to reduce Unit 2 power levels to reduce the possibility of an automatic trip initiated by the SPS and concluded that these decisions were proactive and reflective of a conservative approach.

➤ Single Point Vulnerability Program – Mr. McWhorter reported in 2017 an industry-wide effort was made to identify single point vulnerabilities (SPV), that is, components where a single failure could cause a reactor trip or other similar disturbance at a station. He reported components representing a SPV are identified in the SAP¹¹ system. Efforts continue to address the issue presented by SPVs under the INPO Industry Event Report of 2014 and WANO's Significant Operating Event Report of 2015 as well as by benchmarking with other plants. The FFT concluded the SPV Program was being well managed and it is now considered to be part of the Equipment Reliability Program.

➤ Spent Fuel Canister Corrosion – Consultant McWhorter reported that the Committee received an inquiry from a member of the public with specific technical questions related to the inspection of the multi-purpose spent fuel storage canisters (MPCs) located at the Independent Spent Fuel Storage Installation (ISFSI). He reported the inspection results are publicly available as Appendix E to the License Renewal Application for the ISFSI and have been reviewed by the DCISC. The questions from the member of the public were reviewed by PG&E and responses were provided. **The FFT met with and requested additional information and is included as Enclosure 1 to the Fact Finding Report. The FFT concluded responses were received to questions and the additional information received should be reviewed during future fact-finding in December 2025 and a recommendation to the Committee was made in the Fact Finding Report .**

➤ Root Cause Evaluation for Auxiliary Saltwater Pump Motor Failure – Mr. McWhorter commented that this topic has been discussed on several occasions and concerns a repeat of the failure of Auxiliary Saltwater Pump 2-2 motor bearing in 2018 and again in 2023. In 2018 a root cause evaluation (RCE) was completed which should have prevented recurrence in 2023. The DCISC has reviewed this matter on several occasions and concluded procedural changes should be effective to prevent a third occurrence, but the questions remained why the 2018 procedural

¹⁰ A reactor trip, also known as a scram, is the rapid and automatic or manual shutdown of a nuclear reactor. This is achieved by inserting control rods into the reactor core, which absorbs neutrons and halts the nuclear fission chain reaction. It is a safety mechanism to prevent damage to the reactor and its components.

¹¹ SAP (Systems, Applications, and Products) is a leading German software company and provider of enterprise resource planning (ERP) software.

changes were not effective. He reported that there were options in the 2018 maintenance procedure changes following the 2018 failure that were not effective to ensure the actual reload was correctly set up due to there being insufficient closure between the plant staff developing the subsequent procedural changes and the personnel who had conducting the 2018 RCE.

Consultant McWhorter reported the Corrective Action Program has been changed such that in the future when procedural changes are driven by a RCE they will be reviewed by and agreed to by a RCE evaluation team member to ensure the intent of the RCE evaluation team is met by the change. The FFT concluded the evaluations were complete as to why the procedural changes were ineffective in 2018 to prevent a recurrence in 2023 and effective corrective actions are now in place. Mr. McWhorter reported that the Recommendation to PG&E on this issue is recommended by the FFT for closure.

➤ Refueling Outage 2R25 Update and Safety Plan – Mr. McWhorter stated this visit was for an update on the scope of the outage and the schedule, including refurbishment of the High Pressure Turbine. He reported the scope of 2R25 is essentially the same as for 1R25 without the work for the vessel in-service inspection and reactor vessel surveillance capsule removal. The safety schedule uses a defense in depth, risk-informed deterministic approach to ensure equipment remains available to maintain water in the core. A designation of N+1 represents that all the needed equipment for redundancy plus one additional piece of equipment is available. Mr. McWhorter reported during 2R25 defense in depth windows are all to be maintained in Green¹² status with the exception of three Yellow windows, with no Orange or Red windows which Mr. McWhorter remarked was typical for a DCPD refueling outage. He reported there is one infrequently performed activity planned which is to take all 230kV lines out of service for switchyard upgrades, thereby leaving the station back-fed from the 500kV lines and this work is covered by the Outage Safety Plan. The FFT concluded the preparations for 2R25 are progressing well and the work is covered by the Safety Plan.

➤ Transmission Systems – Mr. McWhorter reported that the FFT found the 230kV and 500kV Systems in good health. There are some minor issues with the glass insulators on the 500kV System due to cracking and breakage, but the total stack is well above the minimum required and the failure rate is not atypical. Insulators will be repaired as lines are taken out of service. The analog relays on the 500kV System will be replaced in phases during the outage with digital relays in the switchyard. The current 230kV switchyard breakers will be replaced with new breakers containing gas installed for improved reliability. Consultant McWhorter reported DCPD grid stability and inertia has been good and the station has not seen any issues of concern with voltage or frequency variation on the 500kV System and he stated issues with the 230kV System would be addressed by reconfiguration from the grid control center as necessary. For low voltage situations on the 230kV System there are capacitor banks in the switchyard that can be switched in and out. **Mr. McWhorter remarked concerning grid inertia, a topic raised during public meetings by Dr. Gene Nelson, it is an issue that the Committee should follow as there is a potential for an effect on safety, but it is not a current issue affecting DCPD.** The issue involves large amounts of renewables on a grid system with at the same time a low

¹² Color-coded windows in Green, Yellow, Orange and Red are used and for a typical outage there might be a reduced number of Yellow windows where defense-in-depth is reduced to N+1.

number of rotating generators such as those at DCP. This tends to produce a frequency in voltage generated by inverters and rectifiers without the physical kinetic energy produced by rotating generators being present to dampen out oscillation on the grid system. Mr. McWhorter observed grid inertia has more to do with failure modes on the wider grid system and how that system can endure a failure such as the loss of a large generating resource. The FFT concluded both the 500kV and 230kV Systems were in good health with no major issues and there are projects underway to upgrade breakers and relays in both switchyards.

- Observe Readiness Review Board Meeting – Consultant McWhorter reported this meeting was oriented toward outage readiness. Specifically, the responsibilities assigned for the defense in depth windows when the Plant is shut down and offline and how the windows are sequenced with regard to the secondary systems¹³ taken out of service at the beginning of the schedule. The FFT found the meeting was well facilitated and the discussions open and effective.
- Station Update – Mr. McWhorter reported that with Dr. Scarlat and representatives of the DWR attending remotely, the FFT met with the Maintenance Director and reviewed recently completed maintenance outage windows on all six emergency diesel generators (EDGs), with one having been completed in 2024 and five in 2025. He stated the update was informative with no new issues identified.
- Discussion of Seismic Review Team Recommendations – Mr. McWhorter reported there now have been three separate meetings, two of which involved the DCISC Seismic Review Team,¹⁴ including a field trip to observe rock formations in the Santa Maria Basin and the second a meeting between the PG&E Geoscience staff and the SRT accompanied in person by Dr. Meshkati and remotely by Consultants McWhorter and Kadak to provide PG&E an opportunity to ask questions concerning the nine recommendations made in the SRT’s “Review of the Bird Critique.” During this third meeting Mr. McWhorter and Dr. Budnitz met with PG&E Geoscience staff to provide an opportunity for Dr. Budnitz to discuss and review the questions posed by PG&E and the potential significance of the nine recommendations made by the SRT, which focused primarily on faults within the Southwest Boundary Zone and around the Irish Hills, located behind the Plant. Consultant McWhorter reported that it is unlikely that any of the nine recommendations will result in a significant change to the overall seismic hazard to the Plant which is based on the Hosgri Fault as presently understood. He reported that the FFT concluded, based on the work of the SRT, there is no immediate safety concern. The FFT concluded the information gathered will inform the Committee’s decision on how to disposition the work of the SRT and the nine recommendations to be made as proposed in the next Annual Report and PG&E’s future response. Dr. Budnitz commented that PG&E has consistently committed to taking all the recommendations seriously and soon would be making some changes

¹³ Primary and secondary side refer, respectively, to the Reactor Coolant System which is used to remove heat from the nuclear reactor (Primary side) and to the Main Steam and Feedwater Systems which provide cooling to the steam generators and generate and provide steam to the turbines (secondary side).

¹⁴ During 2024 and early 2025, in several venues including before the DCISC Dr. Peter Bird contended that the seismic hazard at DCP has been underestimated by PG&E. At its February 2024 public meeting the DCISC engaged the Seismic Review Team (SRT) to conduct a peer review of Dr. Bird’s contentions. The SRT members are Drs. Thomas H. Jordan, Micheal E. Oskin and Scott T. Marshall.

to their Long Term Seismic Program (LTSP) to address and imbed the recommendations in the LTSP. PG&E also indicated that all the recommendations in PG&E's view do not have equal weight and PG&E would accordingly be developing priorities and plans for their implementation and be available to discuss priorities with the DCISC, the SRT and the CPUC Independent Peer Review Panel (IPRP) [for seismic studies of the DCPD Plant site and its environs].

➤ Meet with DCPD Senior Director – the FFT met with Senior Director Tom Jones and Mr. McWhorter reported the meeting was productive and the discussion focused on items on the FFT's agenda.

➤ Emergency Diesel Generators – Consultant McWhorter reported the FFT, with Dr. Scarlat and representatives of the DWR attending remotely, met with the system engineer for the EDGs and received a report that all three EDGs on each unit were in Green¹⁵ health status and the EDGs reliability has been good over the last two year period without a failed diesel start in many years and no issues of significant unplanned unavailability. He reported there are several reliability improvement programs underway to address issues with the fuel oil day tank level switches and alarm relay panels. Mr. McWhorter reported there were two failures that occurred during testing when EDG 2-3 tripped on overspeed following the maintenance window which was caused by the governor linkage when a cotter pin caught on a stop bolt. It was found that the stop bolt was only present on EDG 2-3 and was not present on the other EDGs. The linkage operability was quickly restored and long term corrective actions were assessed which may include removing the stop bolt since it is not present on the other five EDGs, EDG 2-3 having been acquired separately from the other EDGs. A second testing issue occurred on EDG 2-2 when the jacket water pump seal was found to leak at the rate of 1/3 gallon per minute only during operation. **An operability determination based on mission time was performed and EDG 2-2 was returned to operability without the leak being repaired with repair scheduled for the next maintenance window. The FFT found the EDGs had no major equipment issues, two equipment failures being addressed in the Corrective Action Program and the FFT made a recommendation for follow up concerning the operability determination/mission time documentation at a future fact finding.**

➤ Plant Tour – the FFT toured the Plant including the EDG areas and visited the site of both the seal leak on the jacket water pump on EDG 2-2 and the bolt-cotter pin linkage interaction of EDG 2-2.

Following Mr. McWhorter's report Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson stated concerning the issue of grid inertia that while there could be good frequency and voltage control at DCPD, under conditions of high penetration of renewables such as seen in Spain at locations away from their nuclear power plants, the results can be a "bristled grid" with essentially no means to inter-convert mechanical rotational kinetic energy into electricity or vice versa. He stated in accord with his correspondence to the DCISC earlier that day he wanted to clarify that the issue is not maintaining frequency and voltage at

¹⁵ An assessment of Green means there is no equipment out of service or some other compromise to safety that would make the relative risk higher than the probabilistic risk assessment baseline for normal operation and maintenance activity and accordingly trigger a classification, in descending order, of White, Yellow or Red.

DCPP and DCPP provides a kind of governor to the grid. He identified the date of May 4, 2025, during a Unit 1 outage at midday as a problem date and he stated he inquired concerning the grid conditions on that date with the California Independent System Operator (CAISO),¹⁶ but has not received a response. Consultant McWhorter observed from the Committee's perspective the issue involves two aspects, the first being how it affects and creates a direct safety concern at DCPP during routine operations and the second being whether the grid is having statewide regular voltage problems which he acknowledged could be a safety problem for DCPP. But Mr. McWhorter stated that the issue is broader than its effect on nuclear safety. Dr. Scarlet observed and Mr. McWhorter agreed that the issue is likely addressed within the context of loss of offsite power and is within the Plant's design basis analyses which has been reviewed extensively by the DCISC.

In response to Dr. Meshkati's query Mr. McWhorter confirmed the six EDG are the primary source of alternate power and a seven day supply of fuel is maintained on the site, with FLEX¹⁷ strategies involving portable generators, which are tested and maintained serving as backup to the EDGs. Dr. Budnitz observed that the nuclear industry also maintains emergency equipment, including generators engineered and available to be connected, at two locations, Memphis Tennessee and Phoenix Arizona, which equipment could be onsite at DCPP within 24 hours. In response to Dr. Scarlet's question as to what is acceptable regarding the frequency of a station blackout Mr. McWhorter reported that question might be addressed through probabilistic risk assessment analysis. Dr. Peterson observed the probability of the risk of loss of onsite power in addition to offsite power is low and likely acceptable due to the redundancy of the EDGs, and loss of circulating water and a shutdown without the ability to vent steam to the condensers creates conditions for one of the more severe shutdown transient¹⁸ a plant can be subjected to, and loss of all offsite power would likely result in that type of severe shutdown transient for both units.

Ms. Shannon Chu, a member of the public, was recognized. Mr. Chu stated her comments and questions [posed on an enclosure with the Fact Finding Report] concerned spent fuel canister corrosion. She framed her inquiries based on her reading of the enclosure: (a) Question 2 – concerns whether the new tool is capable of observing stress corrosion cracks if they are present. (b) Question 3 - concerns pitting corrosion rates which are indicated by rust and the resulting potential for stress corrosion cracking in welds. (c) Question 4 - concerns PG&E projected growth rate for stress corrosion cracking of 0.06 inches in five years, which would mean through-wall cracking in 42 years. (d) Question 5 – concerns whether PG&E will collect surface temperature measurements to confirm surface temperatures are high enough to preclude

¹⁶ The CAISO manages the flow of electricity across high-voltage, long-distance power lines, operates a competitive wholesale energy market, and oversees transmission planning.

¹⁷ FLEX is not an acronym but describes a strategy developed by the nuclear industry to provide diverse and flexible coping strategies to address the loss of safety-related systems due to certain beyond design basis events. It is a group of supplemental components, many of them portable, which are seismically stored, and can be made available for timely attachment to permanent plant systems for accident mitigation.

¹⁸ A transient is a change in the reactor coolant system temperature, pressure, or both, attributed to a change in the reactor's power output. Transients can be caused by (1) adding or removing neutron poisons, (2) increasing or decreasing electrical load on the turbine generator, or (3) accident conditions.

deliquescence¹⁹. (e) whether PG&E is confident, and if so the basis for that confidence, in the accuracy of the depth measurement tool for features with high aspect ratios where depth is significantly deeper than the opening. (f) whether PG&E has demonstrated, and if so how, the tools applied to evaluate the inspection results meet acceptance criteria in the License Renewal Application and are capable of observing chloride stress corrosion cracking. **Dr. Peterson observed Ms. Chu's comments were consistent with written questions she submitted earlier and the DCISC will take an action to follow up on her questions.**

On a motion made by Dr. Peterson, seconded by Dr. Meshkati, the September 16-17, 2025, Fact Finding Report was unanimously approved.

B. The Chair requested Consultant Mr. Wardell to provide a summary report on the July 21-22, 2025, fact-finding visit with Dr. Peterson. Mr. Wardell reviewed the topics discussed with PG&E during the July 2025 visit as follows:

➤ Reactivity Management Update – Consultant Wardell stated the Reactivity Management Program is an important safety program which measures reactivity, that is it measures neutron activity generated by the fission process in the nuclear core. The neutron activity is controlled through the use of control rods and by chemicals in the core coolant. He reported reactivity is the fractional change in the neutron population from one neutron generation to the next such that it measures departure from criticality, which is a steady state of neutron production, and thereby the potential of the nuclear core to increase or decrease the chain reaction or the rate of power change. Mr. Wardell reported operators are initially responsible for directly controlling reactivity and the Plant has a Reactivity Management Leadership Team consisting of representatives from the Operations, Maintenance, Engineering, Learning Services and Corrective Action organizations. The Reactivity Management Leadership Team reviews each reactivity event and action is taken as appropriate using scaled levels of significance. Mr. Wardell reported DCPD has an effective Reactivity Management Program and closely follows procedures including for assessing program health and trends. He reported that the DCPD compares very favorably to the nuclear industry and the FFT found the Reactivity Program to be very healthy.

➤ Operating Experience Program Update – Mr. Wardell reported the Operating Experience Program reviews information received principally from INPO and the NRC on events at other nuclear power plants. He stated every nuclear power plant participates in this exchange and at DCPD the program is staffed by a single Operating Experience Coordinator with the assistance of an assigned backup. DCPD receives 15 to 20 event reports each week and the program Coordinator reviews these reports with a subject matter expert on the plant staff to evaluate the report and determine if it is applicable to DCPD. If so, the subject matter expert creates a Notification²⁰ in the Corrective Action Program which is used to track and follow subsequent

¹⁹ Deliquescence is the process where certain substances absorb so much moisture from the air that they dissolve in it, turning from a solid into a liquid solution, often occurring at specific relative humidity levels. This phenomenon involves a phase change from solid to solution, common in highly soluble salts like calcium chloride or potassium hydroxide.

²⁰ The notification process creates an input called a Notification into the Corrective Action Program whenever a deficiency is identified and those Notifications then go through multiple reviews.

actions. The FFT concluded that the Operating Experience Program is healthy and is functioning effectively.

➤ Maintenance Rule Functional Failures – Consultant Wardell reported the Maintenance Rule was generated by the NRC to assess maintenance plans against risk-informed performance based criteria. If the criteria are not met for a maintenance deficiency a functional failure under the Maintenance Rule may be assessed as the deficiency could have been prevented by performance of appropriate maintenance. Mr. Wardell reported DCPD has a good record regarding the number of Maintenance Rule functional failures and the Maintenance Rule is being appropriately and effectively implemented at DCPD.

➤ Meeting with NRC Resident Inspectors – the FFT met with Senior Resident Inspector Mr. Mahdi Hayes. During the meeting the FFT reviewed DCPD operating history since the last DCISC fact-finding visit and the preparations for the upcoming refueling outage from the NRC's perspective.

➤ Auxiliary Building Ventilation – Consultant Wardell reported the Auxiliary Building Ventilation System consists of fans, dampers, filters, and air handling units to supply heat and cooling to safety-related equipment in the Auxiliary Building and the system consists of two trains²¹ which are used alternately every other two week period. Mr. Wardell stated that because of the potential for radioactive particulates and gases to enter the system it is equipped with radiation monitors which close dampers and other components in the case of a radioactive surge. The system has charcoal filters to control radioactive iodine which may enter the system.

➤ Electronic Procedures – Consultant Wardell reported that a program initiated in 2023 at DCPD to implement the use of electronic procedures was not successful. Following benchmarking efforts DCPD is now initiating another effort relative to the use of electronic procedures using Apple iPads, beginning with Operations procedures using the Next Axiom firm's platform which integrates well with the Plant's SAP data management system. The iPads allow data to be logged in the SAP system and to track trends. Mr. Wardell stated the Committee has and continues to support DCPD's use of electronic procedures as it improves documentation of work and can significantly contribute to a reduction in human error and operational safety. He reported a Recommendation (P12/24FF3.2) to PG&E was previously made to expand the use of electronic procedure-type applications subject to proper human systems integration.

➤ Reports to NRC on 2024 Radiation Releases and Radioactive Environmental Monitoring- Mr. Wardell reported these publicly available reports are produced every year to report to the NRC on measured radiation releases and radioactive environmental monitoring and provide information on direct radiation and radioactive liquid and gaseous releases. He reported at DCPD the primary sources for direct radiation are the ISFSI and the Old Steam Generator Storage Facility. For 2024, from those sources total radiation was 6.7 millirem. For liquid effluent,

²¹ Train in this context means a series of parts or elements that together constitute a system or produce a result.

mainly tritium, the releases are mixed and diluted with water discharges from the Plant. For 2024 for liquid releases the calculated radiation dose was 0.000285 millirem which was 0.0095% per the Offsite Dose Calculation Manual (ODCM). For gaseous releases the calculated radiation dose was 0.000549 millirem which was 0.000366% per the ODCM. Mr. Wardell and Dr. Scarlet observed these data represent very small fractions of the allowable limits, in the case of liquid releases they are four orders of magnitude less than the allowable limit. Dr. Budnitz agreed and stated these percentages are so small as to essentially mean nothing in terms of radiation protection and he commented they are less than what one would experience in flying in an aircraft for five hours from the west coast to the east coast. Dr. Scarlet commented 0.1% if the risk from all other technological risks was defined by the NRC with public input as acceptable risk, so in principle our society has defined what is acceptable and unacceptable risk and it is quantified by that limit and Dr. Scarlet commented the results of these reports were reassuring to her.

➤ Workplace Seismic Safety – Consultant Wardell reported this is an effort by the DCISC to ensure DCPD personnel safety and accessibility in a seismic event. The FFT toured the Plant to assess whether there are unbraced or unsecured cabinets or other furnishing. In December 2024 a cabinet in the Chief Nuclear Officer's office, for which relocation was planned prior to the FFT visit, was found to be unbraced. Mr. Wardell stated in the past the DCISC has found DCPD was not implementing its Workplace Seismic safety Program consistently, however, a team has now been assigned by the Plant to that program and more attention is now focused on the program. **Mr. Wardell reported a Recommendation (P12/24-3.8) has been made to PG&E to review why an extent of condition for an unbraced cabinet found in July 2024 did not prevent a similar condition identified by the DCISC in December 2024. He reported this Recommendation was subsequently completed and closed.**

➤ Artificial Intelligence Program Update – the FFT reviewed this issue on which the Committee received a report earlier at this public meeting.

➤ Plant Update since May 2025 Fact finding – the FFT discussed the results of the Unit 1 refueling outage and the INPO and NRC inspections.

➤ The ISFSI – Mr. Wardell reported the FFT reviewed with PG&E the highly technical questions received from a member of the public concerning regarding stress corrosion cracking of the spent fuel Multipurpose Canisters. He commented that these questions were also addressed in the report on the September 2025 fact finding by Consultant McWhorter.

On a motion made by Dr. Meshkati, seconded by Dr. Peterson, the July 21-22, 2025, Fact Finding Report was approved with Dr. Scarlet abstaining.

A short break followed.

C. The Chair requested Consultant Mr. Wardell to provide a summary report on the August 12-13, 2025, fact-finding visit with Dr. Meshkati. Mr. Wardell reviewed the topics discussed with PG&E during the August 2025 visit as follows:

➤ PG&E Board of Directors Safety and Nuclear Oversight (SNO) Committee – Dr. Meshkati reviewed his meeting with two members of the SNO Committee, made up of certain members of the PG&E Board of Directors, with SNO meetings being scheduled six times each year. He stated the meeting had gone well and in the Fact Finding Report recommendations were proposed to both the Committee and to PG&E to facilitate a further semi-annual dialog with the SNO. He observed that the DCISC has attended meetings of the PG&E-appointed Nuclear Safety Oversight Committee (NSOC) both in person and remotely for some time now and commented interactions with the SNO could be similarly structured. Dr. Meshkati commented that all the information he has now obtained concerning the responsibilities and composition of the SNO is in the public domain. He remarked he seeks a cordial, collegiate dialogue with the SNO Committee to exchange information and he would welcome attendance remotely or in person of SNO Committee members at the DCISC's public meetings and he expects reciprocity on behalf of the SNO to share information and improve the safety of the Plant. He characterized the recommendations made in the draft Fact Finding Report as benign and cooperative. Dr. Meshkati stated in his professional experience he has seen the very important role that a corporate board of directors can play in the safety of the operation of an organization. He remarked on the opinion of a court after two accidents involving Boeing aircraft that found that the role of a corporation's board of directions is mission critical in terms of safety and he commented this was the principal reason for his interest. He reviewed the text of the two recommendations made in the draft Fact Finding Report to learn about and coordinate with the SNO Committee's strategic issues affecting the Plant's systems and occupational personal safety. Dr. Budnitz, speaking as a Committee Consultant, suggested that wording concerning the effect of the Plant's public health and safety might replace the reference to system safety as Dr. Budnitz stated he was unsure of the meaning of that term.

Following conclusion of Mr. Wardell' report on the August 2025 fact-finding, the Members resumed their discussion of the proposed recommendations. Dr. Meshkati reported the concept of system safety as opposed to occupational safety became prominent after the accidents and through the accident investigations of both the British Petroleum Texas City Refinery in 2005 and later the Deepwater Horizon accident on which Mr. Meshkati reported he served on both the accident investigations boards. Dr. Meshkati commented he has also served as an advisor and consultant to the U.S. Chemical Safety Board. In response to Dr. Scarlat's query about the need for specificity in the recommendations, Dr. Meshkati stated he believes the SNO Committee's decisions affect plant equipment, plant systems, plant personnel, and public safety. He stated his belief that human operators are the first and last layer of defense for the public and their safety is affected by system safety and equipment safety and the decision made at the Board level. Dr. Meshkati stated he hopes the SNO Committee will share the agendas for their meetings redacting financial information as necessary, and he stated he does not see issues of confidentiality or transparency concerning this matter. However, Dr. Meshkati stated that if the SNO Committee declines to share that information at least it should enter into a dialogue with the DCISC either remotely or in person not less than twice each year.

Dr. Peterson observed the DCISC protects confidentiality in context of its interactions with INPO and the NSOC, but he remarked he questions specifying a frequency for these meetings as other Committee inquiries are conducted on an as-needed basis guided by the Open Items List. Dr. Scarlat suggested although a meeting between the SNO Committee and DCISC might be

beneficial she disagrees with making such a prescriptive recommendation and that before considering or making any recommendation to PG&E the DCISC should seek to hear from representatives of the SNO Committee on the appropriate frequency. Dr. Meshkati stated he does not believe this matter can be left up to PG&E as he stated the DCISC is an independent committee of the State of California and he commented it was not an easy task to get PG&E to arrange this first meeting of 55 minutes duration with the two representatives of the SNO Committee and in the future he would prefer more time for meeting with the SNO Committee.

PG&E Director Tom Jones stated the mandate of the SNO Committee and the subject matter of its meetings are much broader than nuclear-related issues as they include responsibility for the safety of PG&E's gas, transmission, and electrical distribution systems. Mr. Jones stated PG&E will receive the Committee's recommendation and respond. Mr. Jones remarked the SNO Committee members often travel separately and the recommendation as proposed seeks a meeting with the full Committee. Dr. Scarlat commented the timing of the recommendation appears rushed and more input from the SNO Committee and PG&E on a productive scope for and frequency of the meetings should be sought. Dr. Meshkati remarked that the SNO Committee is charged with responsibility for administrative oversight of safety-related goals and priorities and that meeting with two leading members of the SNO Committee designated by PG&E would be acceptable to him, and if the SNO Committee does not want to meet with the DCISC then meetings will not take place. Dr. Peterson observed it may not be realistic to expect to meet with the full SNO Committee and there is a question of how the meetings should be organized, that is, akin to DCISC's INPO inquiries, where the DCISC receives a briefing on what happened during the meeting or akin to the DCISC's attendance in person or remotely at the NSOC's exit meetings. Dr. Peterson stated that he supported gathering more information and knowledge concerning the function of the SNO Committee and working on this matter to have a final recommendation draft for consideration at the February 2026 public meeting. In response to Dr. Meshkati's query Dr. Peterson stated he agrees with Dr. Meshkati on the need to meet with the SNO Committee, but Dr. Peterson there is a question whether the format should be what is employed with INPO where the DCISC is briefed on INPO findings and recommendations but does not meet with INPO, or the format the Committee employs with the NSOC where the DCISC representatives listen to the NSOC exit meetings. Dr. Peterson stated at this time he does not know enough about the SNO Committee to know which approach would be best, but he remarked from the Plant's perspective that it is easier to have someone brief the DCISC on what is covered by the SNO Committee discussions. Dr. Meshkati referred to the important role played by the SNO Committee which after the San Bruno PG&E gas line accident in 2009 is now composed of members with safety backgrounds.

Dr. Peterson noted the Committee would be challenged to complete its afternoon agenda and with the concurrence of the other two members this issue was tabled until the following day.

DCISC Consultant Dr. Kadak was recognized. Dr. Kadak stated the initial rationale for meeting with the SNO Committee was to assess the safety-related issues being reviewed by both the DCISC and the SNO Committee. Dr. Kadak stated he was pleased to see the DCISC will continue its effort to meet again with the SNO Committee. Dr. Meshkati thanked Dr. Kadak and reported Dr. Kadak had greatly assisted with the preparation of the agenda for the DCISC's first meeting with the SNO Committee.

Dr. G. Kenneth Koves was recognized. Dr. Koves stated his opinion that the largest and most influential variable in a nuclear power Plant's safety culture is the management and the management team, while the second most important variable is the corporate team and therefore regular communication at the corporate level is important. He stated that in context of system safety there is also a component included of management systems and management safety systems. Dr. Meshkati thanked Dr. Koves and he reported Dr. Koves previously worked for both INPO and WANO and is considered to be the most responsible person concerning the INPO document "Traits of Healthy Nuclear Safety Culture."

Dr. Peterson observed there is a strong consensus that the SNO Committee needs to engage with the DCISC to enable the DCISC to maintain awareness of the topics under review by the SNO Committee.

➤ Meeting with Chief Nuclear Officer Ms. Paula Gerfen and PG&E Vice President for Business and Technical Services. Maureen Zawalick – the FFT discussed with the PG&E officers the agenda for the fact-finding visit and issues related to nuclear safety culture and about Dr. Meshkati's meeting with the SNO Committee.

➤ Safety Conscious Work Environment – Consultant Wardell reported nuclear safety culture is one of the most important attributes of a nuclear power plant and is periodically reviewed by the DCISC, the NRC, and by INPO. He reported DCPD has a strong nuclear safety culture and the FFT reviewed a recent report to the Chief Nuclear Officer by the Safety Culture Leadership Team which concluded DCPD has a healthy safety culture and leadership and staff behaviors were in line with the INPO documents "Traits of a Healthy Nuclear Safety Culture" and "Leadership Team Effectiveness Attributes." Mr. Wardell reported neither the NRC nor INPO have raised concerns regarding nuclear safety culture through their inspections and none have been raised recently through the DCPD Employee Concern Program.

➤ Beyond Design Basis Accident Mitigation Guidelines – FLEX – Mr. Wardell reported based upon the beyond design basis accidents at Three Mile Island Nuclear Generating Station in Pennsylvania, the Chernobyl Nuclear Power Plant in the Ukraine, and Fukushima Daiichi Nuclear Power Plant in Japan, the industry developed actions response including the development of Extensive Damage Mitigation Guidelines (EDMGs). EDMGs provide, among other mitigation measures including measures addressing extra water supplies and power to operate pumps. Mr. Wardell reported EDMGs are activated when command and control cannot be established from the Control Room or from the hot shutdown panel, or when damage occurs to a spent fuel pool. **Dr. Peterson commented that in this context the DCISC has made a Recommendation to add entry points from post-earthquake procedures into the EDMGs and FLEX** and Dr. Peterson remarked one of the reasons for having FLEX capabilities is to address damage from an earthquake which is outside the Plant's design basis and this represents a third reason for entering into EDMGs.

➤ Meeting with NRC Resident Inspectors – Consultant McWhorter reported the FFT met with Senior Resident Inspector Mr. Mahdi Hayes and Resident Inspector Eli Garcia to discuss

the agenda for the fact-finding visit, the situation with the California wildfires and the power reduction in response.

➤ **Electronic Procedures – Mr. Wardell reported DCPD is moving ahead, starting with the Operations organization, with implementing use of electronic procedures and he stated this is an area the DCISC has been following closely as a good way to improve human reliability and plant safety and has endorsed and made a Recommendation supporting the Plant's plans for the use of electronic procedures.** The FFT received a video presentation demonstrating the use of electronic procedures.

➤ Artificial Intelligence.

➤ **Observe Plant Health Committee Meeting –** Consultant Wardell stated the FFT observed a meeting of the Plant Health Committee and this is a regular item for a fact finding when the opportunity presents. The Plant Health Committee is made up of most of the plant leadership including the Station Director and meets periodically to assure plant and equipment health and to review short and long-term plans. He reported that the Plant Health Committee meets frequently with equipment engineers and reviews equipment reports. Mr. Wardell reported that the Plant Health Committee maintains a Top Ten Equipment List which at the present time identifies the feedwater moisture separator reheater steam leaks, the EDGs, and obsolescent local control panel alarms as the top items to be addressed. He stated the Plant Health Committee addresses procuring equipment based upon the equipment engineer's recommendations. In response to Dr. Scarlat's question Mr. Wardell replied that the reference in his report relative to the top ten list to the 480 volt switchgear warm terminal refers to the remote monitoring and trending of the heat produced by a terminal, possibly due to corrosion or a loose terminal. Dr. Meshkati remarked that this was his first observation of a Plant Health Committee meeting and he believes the Committee does good due diligence in terms of looking at all anomalies, reducing the number of anomalies, and establishing thresholds for performance and Dr. Meshkati stated it was his impression that the Plant Health Committee does a good job in monitoring the Plant based upon the data it gets from the systems.

➤ DCISC Recommendations to PG&E.

➤ Single Point Vulnerability Update.

➤ **Emergency Diesel Generator Walkdown-** The FFT toured the EDG room and found the area clean with no leaks observed.

➤ **Nuclear Instrumentation Update –** Mr. Wardell reported the FFT met with the system engineer for Nuclear Instrumentation. He stated nuclear instrumentation at DCPD consists of a fixed, Ex-core Instrumentation System to detect activity around the reactor pressure vessel and a Movable In-core Detection System (MIDS) installed through tubes that go up into the vessel from under the reactor pressure vessel to the bottom of the fuel and those detectors can be moved

to measure neutron levels and the balance in the core. Mr. Wardell stated both systems were found to be working well.

- Observe FLEX Diesel Pump Test – Mr. Wardell reported the FFT observed a successful test at the raw water storage reservoirs located above and behind the Plant of a diesel-driven FLEX pump performed to ensure the pump would start and circulate water.
- Simulator Alternate Shutdown Panel – Consultant Wardell reported the FFT visited the Control Room Simulator to inspect the Simulator hot shutdown panel.

Based on the discussion of the wording of a Recommendation to the DCISC and to PG&E concerning future meetings between representatives of the SNO Committee and the DCISC [see above] the Members opted to defer consideration of the approval of the August 12-13, 2025 Fact Finding Report to the following day.

Dr. David Weisman representing the Alliance for Nuclear Responsibility was recognized. Mr. Weisman commented during a previous discussion there was mention of obsolescence of parts for the Annunciator System and he commented the American Nuclear Society recently published a paper concerning the extended life operations of reactors and expressed concern over the availability of original equipment manufacturer (OEM) parts for aging reactors. He commented there is concern that newer parts may not be designed or be robust enough to meet the standards for older plants. **He stated that given this situation there may be more emerging issues under 10 CFR 50.59²² and he remarked this may be an issue for the DCISC to address through the Open Items List. Mr. McWhorter commented that out of the list [of Plant Health Committee top ten items] perhaps four or five items had obsolescence concerns identified and projects, including the Annunciator System, are planned. Mr. Weisman observed in some cases parts will likely simply need to be replaced for reasons other than obsolescence and he asked what would happen if there were no OEM replacements available. Dr. Peterson remarked that Mr. Weisman raised a valid point and the issue should be added to the Open Items List in context of the DCISC review of DCP's 10 CFR 50.59 Program.**

XII ACCEPTANCE OF MINUTES

This item concerned review and acceptance of the Minutes of the Committee's June 10-11, 2025, public meeting conducted in Avila Beach and as a Zoom Webinar. A draft of the June 2025 Minutes was included in the public agenda packet for this meeting. Mr. Rathie reported that he was greatly assisted by Ms. Denise Righetti who prepared the Transcript from which the Minutes were compiled. Dr. Peterson remarked that the use of **bold** text in the Minutes is important as it captures and describes some action or commitment on the part of the Committee

²² 10 CFR 50.59 establishes the conditions under which licensees may make changes to the facility or procedures and conduct tests or experiments without prior NRC approval. Proposed changes, tests and experiments (hereafter referred to collectively as activities) that satisfy the definitions and one or more of the criteria in the rule must be reviewed and approved by the NRC before implementation.

which is then included on the Committee’s Open Items List. The Members and Consultants reviewed the Minutes and provided corrections and substantive changes to certain sections of the Minutes which will be included in the final version of the June 2025 Minutes. The Members and Technical Consultants also conducted a page-by-page review of the June 2025 Minutes and discussed some of the follow-up actions to be taken, provided clarification concerning typographical errors and the accuracy of certain statements in the Minutes, and made editorial comments and changes concerning the draft of the June 2025 Minutes all of which were provided to Assistant Legal Counsel Rathie.

On a motion made by Dr. Peterson, seconded by Dr. Meshkati, with Dr. Scarlat abstaining as she was not at the June 2025 meeting, the Minutes of the June 10-11, 2025, public meeting were approved as revised by the discussion. The Minutes in their final approved version will become a part of the Committee’s 35th Annual Report.

XIII ADJOURN AFTERNOON MEETING

The Chair adjourned the afternoon session of the DCISC at 4:55 p.m.

XIV RECONVENE FOR EVENING MEETING

Dr. Peterson reconvened the evening meeting of the DCISC at 5:00 p.m.

XV COMMITTEE MEMBER COMMENTS

There were no comments by Committee Members at this time.

XVI INFORMATION ITEMS PRESENTED BY THE COMMITTEE

Dr. Peterson requested Dr. Meshkati to introduce the next presentation. Dr. Meshkati stated that starting in October 2024 Dr. Peter Bird, a distinguished emeritus professor at the University of California Los Angeles (UCLA), raised several contentions challenging PG&E’s assessment of the seismic risk at DCPD on behalf of the San Luis Obispo Mothers for Peace. [Dr. Bird filed contentions with the CPUC in January 2023 and his summary report to the DCISC was submitted on October 30, 2024.] Dr. Bird’s contentions were raised as well with the NRC. At the February 2025 public meeting the DCISC took action to engage individuals with very specific expertise in seismology, neotectonics, and geodesy and entered into contracts with Dr. Thomas Jordan, Dr. Michael Oskin, and Dr. Scott Marshall to constitute the Committee’s Seismic Review Team (SRT).

Dr. Meshkati reported Dr. Jordan is a colleague at USC and has served as the Director of the Southern California Earthquake Center [now known as the Statewide California Earthquake Center] and is a member of the National Academy of Sciences. Dr. Jordan led the SRT efforts on an assignment from the Committee to review Dr. Bird’s contentions. Dr. Meshkati reported the SRT has worked independently of the DCISC and finalized and presented its report entitled “Review of the Bird Critique” at the Committee’s June 2025 public meeting. In that report, the SRT proffered nine recommendations to PG&E which the DCISC accepted and directed that they be included in the Committee’s 35th Annual Report. Since the June 2025 public meeting further communications have been received from Dr. Bird on behalf of Mothers for Peace and the NRC also issued its evaluation of Dr. Bird’s contentions. The SRT reviewed and has

provided responses to both filings, and Dr. Meshkati reported all the relevant documents in connection with this matter have been posted to and are available on the Committee's website. On behalf of the Committee Dr. Meshkati expressed his appreciation to each of the members of the SRT and particularly to Dr. Jordan for his having traveled from the East Coast for this meeting.

Report on the Results and the Continuing Work of the Seismic Review Team, Consultants Dr. Thomas Jordan, Dr. Scott Marshall and Dr. Michael Oskin, to Review Matters Concerning the Seismic Hazard at the DCPD Site and Environs Including by Dr. Peter Bird and by Others.

Dr. Jordan introduced Dr. Michael Oskin, Professor of Geology at the University of California at Davis, an expert in neotectonics and earthquake geology, and Dr. Scott Marshall, Professor at Appalachian State University, an expert in computational models of faulting, satellite geodesy and geophysics. Both Dr. Oskin and Dr. Marshall attended the meeting remotely via the Zoom webinar.

Dr. Jordan stated the SRT was formed by the DCISC to respond to a series of filings by Dr. Peter Bird, Professor Emeritus at the UCLA, regarding Dr. Bird's assessment of the seismic hazard at DCPD and its environs and his belief that the seismic hazard from one or more of the thrust faults beneath the Plant has been underestimated by PG&E. The SRT completed its report entitled "Review of the Bird Critique" and presented this review at the June 2025 DCISC public meeting, Dr. Bird responded orally and in writing. His June 6th written response is entitled "Technical Response to the Review of the Bird Critique, with Recommendations for Further Actions." The SRT was subsequently asked by the DCISC to review that document and also the letter of June 26, 2025, from San Luis Obispo Mothers for Peace Attorney Ms. Diane Curran and Dr. Bird. Dr. Jordan stated that the SRT has produced reports on both communications, and they are available on the DCISC website.

Dr. Jordan began with a quick review of the scientific issues. In his critique, Dr. Bird has asserted four main claims, and each has been assessed by the SRT.

- His first claim states that removing the four false assumptions made by PG&E would increase the rate of faulting, the potency rate, and the moment-release rate, all by large factors. Dr. Jordan noted the SRT has looked at this claim very carefully and found that removing those assumptions in the manner suggested by Dr. Bird has little or no impact on PG&E's hazard estimates.
- Dr. Bird's second claim was that three independent analytical methods give a range of slip on the shallow dipping thrust faults beneath the Irish Hills of 2.0 to 2.8 millimeters per year. The SRT's reanalysis of the slip rate data yielded a best estimate of 0.29 millimeters $\pm$ 0.07 millimeters per year, which is an order of magnitude less than Dr. Bird's estimate and relatively consistent with the currently accepted estimates.
- Dr. Bird's third claim identified the Noto 2024 earthquake as a suitable analog for a characteristic earthquake on a thrust fault beneath the Irish Hills. The SRT found that the Noto 2024 earthquake is unsuitable as an analog event owing to its extreme length, high stress drop, and large-scale block tilting.

- Dr. Bird's fourth claim was his estimation that the recurrence interval for a Noto 2024-type earthquake beneath the Irish Hills is 715 to 1,000 years, which, if correct, would pose an unacceptable risk to the Plant. Dr. Jordan reported that the Noto 2024 earthquake does not qualify as an acceptable analog event, but if it were nevertheless adopted as a characteristic event for the Irish Hills, the estimated recurrence interval would be twenty to thirty times longer than Dr. Bird's estimates.

Dr. Jordan concluded that, based on the SRT analyses, the best available science does not support the four main assertions of Dr. Bird's critique.

Dr. Jordan summarized a set of nine recommendations made in the SRT June 2025 Report that could further elucidate the hazards associated with reverse faulting beneath the Irish Hills. The first four concerned neotectonic studies. The SRT noted that PG&E does not have a geometric model of faulting of the Irish Hills that kinematically reproduces observed folding of the Irish Hills since 5 Ma. Fault-bend fold theory provides a framework to refine existing source model geometries and reveal possible sources outside of those considered in the PG&E model. The SRT derived a plausible, though preliminary, fault-bend fold model for the Southwest Boundary Zone (SWBZ, the main source of thrust-faulting hazard), and it recommended further work to develop kinematically constrained structural models that more thoroughly explore the possible configurations of reverse faults beneath the Irish Hills.

A second set of four recommendations concerned geodetic modeling. The SRT recommended that PG&E follow up the SRT's preliminary geodetic analysis with a more complete study of the GPS data to include the examination of cross-structural profiles, strain-rate inversions, and the development of regional models that can accurately correct the GPS velocities for the interseismic deformation due to faults with known geometries and slip rates. The SRT further recommended that the fault-slip models that underlie the DCPD SSC be developed into kinematic and mechanical models that can be directly tested against the GPS data. The ninth SRT recommendation was the overarching recommendation that PG&E should conduct modeling experiments to ascertain the sensitivity of DCPD hazard to the model modifications recommended by the SRT.

In reviewing the Technical Response by Dr. Bird to the SRT June report, Dr. Jordan stated the first aspect is that Dr. Bird believes that active faulting must explain not just the uplift rate of the Irish Hills, which is about 0.2 millimeters per year, but also a crustal thickening rate that is approximately six times larger. Dr. Bird assumes a type of isostatic compensation called Airy compensation²³ where the local topographic height is balanced by the local Moho depth.²⁴ Airy compensation implies a crustal thickening rate approximately six times the crustal uplift

²³ Airy compensation, or Airy isostasy, is a geological model explaining how Earth's topography (mountains, plains, ocean basins) stays in balance, like floating icebergs, by varying the thickness of a crust at a deep level (the Moho). Higher mountains have deeper "roots" extending into the denser mantle, while ocean basins have "anti-roots," maintaining equal pressure at depth, with compensation occurring through vertical crustal changes rather than density shifts.

²⁴ Seismic Moho depth refers to the varying depth of the Mohorovičić discontinuity, the boundary between Earth's crust and mantle, revealed by seismic waves; it is shallow (5-10 km) under oceans, deeper (20-90 km, average ~35 km) under continents, and varies greatly with topography, tectonic activity (thicker under mountains, thinner in basins), showing crustal thickness changes.

rate, however, Dr. Jordan stated Airy isostasy cannot be applied in this case because the load of the Irish Hills is very small compared to the characteristic wavelength of the regional compensation. Dr. Jordan stated the SRT believes regional compensation, where loads are partially supported by the rigidity of the lithosphere,²⁵ is a much better model for describing compensation in this region and that model would involve an effective elastic thickness of approximately 10 kilometers, which is approximately the thickness of the seismogenic layer.²⁶ Dr. Jordan reported that, if one uses that elastic thickness, one finds a flexural wavelength of about 200 kilometers for the horizontal loading. Airy isostasy requires the load dimension to be much greater than 200 kilometers, whereas the characteristic horizontal dimension of the Irish Hills is only 15-20 kilometers, about an order of magnitude smaller than that characteristic wavelength; for that reason, Airy isostasy is not applicable in this case.

Dr. Jordan reported that, in his Technical Response, Dr. Bird challenged the regional compensation proposed by the SRT. He argued that the statement that the elastic plate thickness approximates the thickness of the seismogenic zone does not properly account for the frictional plasticity associated with the yielding of the crust. Dr. Jordan quoted Dr. Bird's assessment that no existing model properly includes this frictional plasticity and noted that this statement is incorrect; frictional plasticity models are well developed and routinely used in regional compensation analysis, and they support the SRT's assertions about the characteristic dimensions. He referred to a model by Ellis & Wang published in 2022, which proposes a frictional plastic model consistent with Dr. Bird's requirements and the SRT's conclusions.

Dr. Jordan then requested Dr. Oskin to continue the presentation and discuss the fault system analysis. Dr. Oskin stated the concerns he would address all have to do with the cross-section constructed as one potential model for the geometry of the Southwest Boundary Zone at depth and there were several rebuttals by Dr. Bird which he would present.

Dr. Oskin stated the first rebuttal involved the position of the Obispo formation offshore relative to the uplifted hanging wall of the Southwest Boundary Zone. In the SRT's June Report he stated it is discussed how some of the relative differences in elevation and preservation of the Obispo Formation might be explained by an earlier phase of normal faulting prior to the current compression across the region. He remarked that Dr. Bird objects to this and maintains that any such fault would have to dip to the south and no such normal fault has ever been mapped. Dr. Oskin then showed a cross-sectional diagram introduced in the SRT's rebuttal report and he commented that the position of the light blue rock shown on the cross-section represents the Obispo Formation, with the sea floor outcrop noted offshore, and folded into the Pismo Syncline underneath the Irish Hills. He noted that the Obispo Formation is truncated against the north-dipping Miguelito fault, a normal fault later reactivated with a lesser amount reverse slip as part

²⁵ The lithosphere is the rigid, outermost shell of the Earth, comprising the crust and the brittle upper mantle, extending about 50-200km deep. Divided into tectonic plates, it floats on the ductile asthenosphere, driving geological activity like earthquakes, volcanoes, and mountain building. It exists in two main types: continental and oceanic.

²⁶ In geophysics and seismology, the seismogenic layer or seismogenic zone covers the range of depths within the crust or lithosphere in which most earthquakes originate. The thickness is heavily dependent on location.

of the SWBZ. He stated when folding of the Pismo Syncline is undone it reveals that the region now uplifted as the Irish Hills was formerly a rift basin, actually quite symmetric, with normal faults on both sides that accommodated crustal thinning by rifting, which happened over a wide region of coastal California more than five million years ago. He further noted that this crustal thinning caused subsidence within the basin and flexural uplift of adjacent areas, leading to gentle tilting that could explain the relative position of the Obispo Formation offshore and the omission of the Obispo formation by erosion or non-deposition immediately adjacent to the Miguelito fault. Hence, Dr. Oskin observed, there is no need to appeal to a fault that dips to the south as opposed to the present set of north dipping faults to explain the present outcrop configuration of the Obispo Formation.

Dr. Oskin reported that the SRT found that the 1.8 ± 0.2 km length of the south limb of the Pismo Syncline provides a robust measure of reverse slip on the Miguelito fault within a kinematically constrained fault model. Dr. Bird's objection is that during Miocene age normal faulting, the northside outcrops would have been displaced down relative to the south side outcrops and therefore the net throw, or fault slip, would have to be larger than Dr. Bird assumed and therefore this thrust slip rate is also greater with no upper limit. Dr. Oskin stated that this is incorrect as the reverse slip on the Southwest Boundary Zone could be constrained from outcrop relationships. Near the surface, slip on the SWBZ is expressed on two faults, the Miguelito Fault with early normal slip and later reverse slip, and the San Luis Bay Fault which he characterized as a footwall shortcut that bypassed the steeply-dipping Miguelito fault for a more direct path towards the surface, close to the present coastline. The slip on the Miguelito Fault must be less than the prior normal slip because the net fault offset is still hangingwall-side down, so it is a more normal slip than reverse slip, so the absolute upper limit of slip on this fault is less than the thickness of the adjacent basin, which is about two and a half kilometers. Dr. Oskin further remarked that slip on both the Miguelito fault and San Luis Bay fault is limited by the presence of deposits of the Upper Pismo Formation, which drapes the hanging wall of the San Luis Bay Fault and exhibits very little displacement across the Miguelito fault. This outcrop relationship would not be preserved if there was a large amount of over-thrusting and erosional removal of material from the hangingwall of the San Luis Bay fault, so these two things combined limit the amount of slip on the SWBZ.

Dr. Oskin reported that the SRT found that both the dip of the south limb of the Pismo Syncline and field observations together support a moderately dipping 40° thrust fault solution. Dr. Bird's contends that because reported fault outcrop dips range widely from 25° to 56° these cannot be reliable indicators of overall fault dip at depth. He also objects that thrust faults that rupture at the surface with gentle dips are preferentially modified by collapse of the unsupported hanging wall part of the fault, leaving rough scarps composed of rubble rather than a clean outcrop. Dr. Oskin showed a field photograph of the San Luis Bay fault from the vicinity of Avila Beach and stated the SRT's contention that the Southwest Boundary Zone dips about 40° is supported both by such field outcrops and by the structural model necessary to produce folding. A more gently inclined 25° dipping fault would produce an untenable geometry at depth. He observed the fault outcrop is actually quite clear at Avila Beach and that measurements of this outcrop from prior work by Hanson and others (1994) fits the model shown in the SRT report. The picture further shows that this fault exposure is within an intact Franciscan Formation bedrock, not collapsed scarp material, and he stated that none of the collated outcrop fault-dip

measurements is less than 25°, contrary to the expectation if these measured from collapsed scarps formed by low-angle fault slip.

Finally, Dr. Oskin rebutted Dr. Bird's contention that the SRT's model contradicts PG&E's assumption that the Pismo Syncline had stopped forming and that the crust between the Southwest Boundary Zone and the Los Osos thrust fault trace is behaving as a rigid block. Dr. Oskin described that the cross-section proposed by the SRT is a two-stage model which explains both the folding and the block-like marine-terrace uplift. Stage one is reverse slip on the San Miguelito fault accompanied by buckling and folding of the Pismo Syncline. This is followed by stage two, reverse slip on the San Luis Bay fault, which because the fault is coplanar with the SWBZ at depth does not buckle the hanging wall, yielding block-like uplift that is consistent with the marine-terrace uplift pattern seen fringing the Irish Hills.

Dr. Jordan asked Dr. Marshall to continue the presentation with emphasis on the geodetic analysis.

Dr. Marshall remarked that Dr. Bird raised a number of objections in his response to the SRT reports that involved geodetic data. He stated there are some differences in reference frame issues regarding GPS velocities, but he pointed out that the SRT and Dr. Bird both use the same geodetic dataset. There are also questions about whether rotation should be removed or not and both the SRT and Dr. Bird agree that the calculated strain rates are independent of the rotation rates, and accordingly, he would not refer further to those matters in his comments. However, Dr. Marshall stated that in the SRT report they discussed why removing the rotation from Global Positioning System (GPS) data is unwise: because this results in very slow motions across the fast-slipping San Andreas Fault which is geologically untenable.

Dr. Marshall stated that in his rebuttal Dr. Bird referred to the original assertion in his critique that the deformation that is seen along the referenced GPS stations that are permanently installed in the Irish Hills show about 1.8 millimeters per year of shortening. Dr. Marshall stated in his presentation he would review why that result is not reliable. He clarified that not all motions recorded by GPS are tectonic in nature but emphasized that, despite this, GPS data does provide useful constraints. He reviewed data from the SRT's computational model showing the Southwest Boundary Zone fault with parameters similar to what was hypothesized by Dr. Bird: a fault with shallow dip of 25°, a 2.5 millimeter per year slip rate, and a typical 15 kilometer locking depth. Dr. Marshall explained that the model results clearly show zones of both contraction (shortening) and extension (stretching). He stated that the SRT report discussed the model predicted velocities if this fault (commonly referred to as the Southwest Boundary Zone) were the only fault creating deformation or motion in the area. We can therefore use this model as a guide to compare the stations from the SRT's report to what Dr. Bird presented in his rebuttal.

Dr. Marshall reported that Dr. Bird referred to GPS stations DCAN [located atop a hill behind the Diablo Canyon Power Plant] and CHOR, and sometimes to station 2110 which he reported is farther to the northeast. The GPS data that Dr. Bird presented showed that the relative motion between these stations is around 2.0 millimeters per year, but the model of the Dr. Bird-type Southwest Boundary Zone fault (shallow dip and 2.0 millimeters of slip) only produces

motions at the surface of the Earth of approximately 0.5 millimeters per year or less between these stations. Dr. Marshall observed this is a large magnitude of difference suggesting the Dr. Bird-type model parameters are not correct.

Dr. Marshall then focused on the GPS velocity vector directions both as presented by Dr. Bird and those predicted by the SRT Southwest Boundary Zone model, and why one should not trust this 1.8 millimeters per year calculation. He observed that the GPS station velocities immediately to the northeast of station DCAN (i.e., stations DAPK and CHOR) in the Dr. Bird analysis (the left figure in the presentation) and in the Southwest Boundary Zone model (right figure in the presentation) both are moving towards station DCAN which indicates contraction (horizontal shortening) and at least some very general first order agreement between the GPS data and the Southwest Boundary Zone model. Dr. Marshall then points out that the similarities end there because in Dr. Bird's figure, stations CHOR and TESS show very different motions compared to the Southwest Boundary Zone model. Station CHOR is moving away from station TESS, which indicates extension of approximately 2.0 millimeters per year. 2.0 millimeters per year of extension right next to 2.0 millimeters per year of contraction is tectonically implausible. He stated that in comparison to what the model predicts, if this were due to faulting (along the Southwest Boundary Zone) alone what one would expect is that those stations should both be moving in the same direction and they should be contracting relative to each other. He stated that it is possible to handpick individual stations within this dataset and allege contraction, extension, or strike-slip motion and that this level of noise is very typical of GPS data in slowly converging areas. Dr. Marshall remarked that it is important to remember that GPS data shows how the ground is moving and the ground could be moving for several reasons: one of which might be due to faults, but the ground can also move due to water cycle effects caused by pumping water in and out of an aquifer or it could be due to seasonal effects. He stated there could also be errors or noise in the time series or other issues that the SRT has not attempted to model.

Dr. Marshall commented that given the large amount of scatter and the low spatial coherence (meaning stations are showing very different motions compared to their neighbors) one cannot simply look at two or three GPS stations and determine, with confidence, what is what motions are and are not tectonic. He therefore stated that something more robust and more regional in nature is required. He reported this is why in the SRT's report analyzed regional profiles in order to minimize the effects of any one station that may be doing something unusual and to focus on the regional trends in the Irish Hills region. He stated that the SRT also used this same GPS data to invert for what is termed strain rates, the overall contraction or extension, and there needs to be a technique used to smooth the data or interpolate it using a method to assist in eliminating unwanted noise in the data. Dr. Marshall credited a paper by Y. Zeng which presented the GPS used by both the SRT and Dr. Bird where Y. Zeng used a smoothing-based strain rate inversion technique for GPS data, similar to that used by the SRT. He described and showed a figure from Y. Zeng where he found similar results to the SRT (extension across the Irish Hills), but at a much lower resolution as that study's focus was the entire western United States. Dr. Marshall asserted that the presence of extension near DCP as one of the big takeaways of the SRT's report.

Dr. Marshall reported, due to the small scale of the Irish Hills, the SRT performed a similar analysis of strain rate inversion (similar to the Y. Zeng analysis) and he displayed a

figure showing the contraction and the extension derived from inverting the GPS velocities using a smoothing-based technique. The slide showed three maps of the predicted strain rates. The left figure used the data as it is in the Zeng dataset. He stated that what is seen are huge variations in the magnitudes of strain rates indicated by “blobs” of contraction and blobs of extension which is due to the data being “noisy” as there are other signals being recorded. Dr. Marshall remarked this does not appear to show a clear tectonic signature. He remarked this is not unusual for slowly deforming regions and it does not mean that geodetic data is not useful, it is just that the data needs smoothing and interpolation. He commented that Sandwell & Wessel have developed a tool called gpsgridded, which is designed to interpolate data for this very purpose.

In response to Dr. Peterson’s question, Dr. Marshall replied that when referring to the uncorrected data the reference is to the data as it is in the Zeng paper with no corrections applied and he reported the corrections in the SRT’s report remove the deformation related to the San Andreas and the Hosgri Faults.

Dr. Marshall explained that the gpsgridded inversion only interpolates signals that are elastically possible and earthquake deformation due to faults is assumed to be elastic, thus removing non-elastic and likely non-tectonic deformation. He commented that after interpolating with gpsgridded, strain rates throughout the Irish Hills are all extensional (indicating stretching) which was surprising because everything in the Irish Hills is believed to be reverse and strike-slip faults in overall contraction. He commented what SRT quickly recognized that this was happening because the data also shows movements related to the San Andreas Fault, and the San Andreas Fault is slipping at over 30 millimeters per year which is 15 to more than 30 times faster than the faults in the Irish Hills and it is drowning out all of the other signals. He reported what needs to be done is to simulate the San Andreas Fault related motion and then remove this contribution to “correct” the data. He reported that if the effects of the San Andreas and Hosgri Faults and some other faults that are farther away are removed, what remains is a very significant correction that completely changes deformation across the Irish Hills from extensional (stretching) to contractional (shortening). Dr. Marshall stated this contraction signature is what is driving the current earthquake deformation in the Irish Hills as the extension is clearly related to the transition from creeping to locked sections San Andreas fault.

Dr. Marshall stated Dr. Bird’s objection regarding the contraction in the Irish Hills is that the SRT’s correction for the San Andreas Fault was done incorrectly which the SRT does not agree with and Dr. Bird maintains that the SRT reduced the magnitude of the shortening by 50% to 70%. Dr. Marshall observed that in reviewing the figures if a correction is not made for the San Andreas Fault strain there is no contraction (after interpolating with gpsgridded), it is all extensional and Dr. Marshall stated he believes in that context Dr Bird has misread the SRT’s report. He commented that Dr. Bird raised several objections related to how the data was corrected and how the correction simulated the San Andreas and Hosgri Faults. Dr. Marshall reported the SRT used a model developed by Loveless & Meade. Dr. Bird stated that the SRT models are fundamentally flawed because of how they fit the GPS data by removing outliers and that because the model used by the SRT is missing faults, which Dr. Marshall stated if true, it will therefore overestimate the slip rates. Dr. Marshall displayed a depiction of the fault geometry used and the simulated deformation which was subtracted from the GPS data and he commented that Dr. Bird’s objections are not relevant because the SRT did not use the actual

Loveless & Meade model just its faults, their slip rates, and the locking depths. For example, he observed, the Hosgri Fault slip was recognized as being too rapid in that model, so it was simply changed to the Seismic Source Characterization average of 1.7 millimeters per year to make it appropriate for the problem at hand. Dr. Marshall reported that geologic rates have been estimated along the San Andreas fault as being between 24 and 34 millimeters per year along the area of interest which is consistent with the values estimated by Loveless and Meade. Dr. Marshall observed that the SRT could have used the geometry that Dr. Bird used in his models and applied geologic slip rates and he stated this would have produced nearly identical results.

Dr. Marshall now asked Dr. Jordan to continue the presentation.

Dr. Jordan stated that Dr. Marshall's discussion pointed out that geodetic data processing is quite complex, but he concluded that, although there's compression associated with the Irish Hills, the rate of compression is much less than Dr. Bird suggested in his analysis.

Dr. Jordan described the SRT's analysis of the Noto 2024 earthquake. He observed that this earthquake was a magnitude 7.5 event and was unusual in terms of its geometry and dynamical characteristics. He reported the Noto 2024 earthquake had a very long rupture length of about 150 kilometers, a very high stress drop, and involved a large-scale block tilting of the Noto Peninsula. He reported Dr. Bird recognized this in his Technical Response and agreed that the rupture is too long to be a good analog event, but Dr. Bird proposed to address the difference by cutting the fault into two sections and then using only the southwestern section (the "reduced" Noto2024 earthquake) as an analog event. Dr. Jordan stated that Dr. Bird further suggested that the earthquake need not be modeled, as it would suffice to simply take the ground motions from the stations to the southwest, sever the part that comes from further up the fault and use that input directly into the seismic probabilistic risk assessment.

Dr. Jordan stated the problem with Dr. Bird's position is that truncating the ruptured dimensions and masking ground motions as Dr. Bird suggests would produce an earthquake that has never been seen and is seismologically unacceptable. It would violate the scaling relation for earthquakes; moreover, there is no validated methodology for assimilating event-specific (deterministic) waveforms into the seismic probabilistic risk analysis. Dr. Jordan stated that in order to use observed data it must be done at the hazard modelling stage. He noted there is a very large effort worldwide to gather information from various earthquakes, including from the Noto 2024 earthquake, and to understand what that means in terms of the statistics of ground motion modelling. He concluded that this analysis should be done as part of the probabilistic seismic hazard analysis, not as part of the risk analysis.

Dr. Jordan then reviewed the SRT's response to comments in the letter sent by Ms. Diane Curran and Dr. Bird on June 26, 2025, as a follow up to the DCISC public meeting held on June 10, 2025. That letter states "Thus, PG&E's claims to have evaluated the active thrust beneath DCPD is seriously misleading, and Dr. Jordan's expression of confidence in the PG&E's work is unfounded." Dr. Jordan emphasized that the members of the SRT have not made any statements to the DCISC, or to the public at large, expressing confidence or lack of confidence in the PG&E model, and he noted that the SRT was not tasked with evaluating the PG&E model *per se*. Dr. Jordan observed that such an evaluation would require an elaborate set of tests that involve all

the faults modeled within the source characterization. Without such a study, the SRT cannot express confidence or lack of confidence in the PG&E model.

In their June 26 letter, Ms. Curran and Dr. Bird acknowledged that the PG&E model did include a thrust fault dipping beneath the Plant, but the letter asserted that the model suffers from four significant defects. The first is that PG&E kept the model fault trace as far as possible from DCPD so as to minimize the hazard, whereas Dr. Bird located his proposed inferred coastline thrust fault more realistically close to the Plant. Dr. Jordan observed that the PG&E and the Bird fault traces lie within about 2 kilometers of each other and both fall within the Southwest Boundary Zone system of faults. He commented that because neither of these fault traces has been observed it cannot be said that either is more realistic than the other. He noted that shifting the fault trace by a couple kilometers would make a negligible difference in the ground motions; according to published ground motion models, shifting it in the manner Ms. Curran and Dr. Bird suggest in their letter could potentially decrease the hazard.

The June 26, 2025 letter referred to PG&E's adoption of a steep dip for the fault (40° to 80°), which reduces both its potency and also keeps it away from DCPD at depth. Dr. Jordan observed that PG&E actually used a dip of 45° to 50° in their southwest-vergent model. As Dr. Oskin reported, the SRT obtained an average dip of $38^\circ \pm 3^\circ$ from available observations, which is marginally less than the range used by PG&E in its model. Dr. Jordan noted that the SRT has recommended that PG&E assess this difference and determine if there's a significant hazard change associated with this revised dip.

Additional points raised in the June 26, 2025 letter include PG&E's use of a low slip rate of 0.08 to 0.2 millimeters per year for the thrust fault and its ignoring of the isostatic factor of 6 caused by footwall sinking 5 millimeters for every 1 meter that the Irish Hills rise. Dr. Jordan reported that the rate PG&E actually used for the San Luis Bay Fault is 0.22 ± 0.08 millimeters per year, not what is claimed in the letter. This compares with the SRT rate of about 0.29 millimeters per year, but this is an order of magnitude less than the Bird rate of 2.0 to 2.8 millimeters per year. The difference between the PG&E rate and the SRT rate can be explained by the difference in the fault dip. He added that the claim that the footwall is sinking five times faster than the Irish Hills are rising is an incorrect inference that comes from the misapplication of Airy isostasy discussed earlier in the presentation.

Dr. Jordan discussed the next point from the June 26, 2025 letter in two parts. Part one is the letter's claim that PG&E only considered models in which the San Luis Bay Fault dips under DCPD in their Southwest Vergent model set, which has a logic weight of 40%, and that this is further divided in a way that gives the most realistic model a weight of no more than 10%. He stated that the 40% weight given to the Southwest-Vergent model is correct, but the 10% weight is not. In the PG&E model, there are actually ten sources associated with the Southwest-Vergent model, four of those ten involve failure of the San Luis Bay Fault and, in sum, produce a rate of $0.22, \pm 0.08$ millimeters per year, which is the target value of the observation. Part two, and the final point made in the letter, is that there should have been a sensitivity study in which the Southwest Vergent fault geometry was assigned 100% weight. Dr. Jordan reported PG&E in its 2015 Probabilistic Seismic Hazard Analysis report did include a sensitivity test that assigned full weight to the Southwest Vergent model. At the 5 Hertz (Hz) spectral frequency, 100% weighting

of the southwest model produced a negligible change in the DCPH hazard. Increasing the model's weight to a higher value, which the SRT has suggested, would not change the hazard very much.

In concluding his remarks, Dr. Jordan stated that Dr. Bird's responses to the SRT report have not dispelled the SRT's objections to Dr. Bird's estimates of the DCPH thrust faulting hazard. He concluded that the SRT has carefully reviewed Dr. Bird's responses and found no new observations or theoretical considerations that would justify changing the SRT's assessment or the recommendations made by the SRT in its June report. He further concluded that the assertions of the Bird critique are not supported by scientific evidence and should be discounted as arguments for high thrust faulting hazard at the Plant.

In response to Dr. Meshkati's question concerning the nine recommendations made in the SRT's Review of the Bird Critique (June Report) and the subsequent work of the SRT, Dr. Jordan stated the SRT has reviewed those recommendations and continues to stand by them.

Dr. Chris Madugo, earthquake geologist with PG&E, was recognized. Dr. Madugo asked Dr. Jordan to clarify the point about the fault location relative to the Plant and the impact on hazard. Dr. Jordan replied the issue was the so-called "hanging-wall effect", which accounts for the fact that the Plant is on the hanging wall of the thrust fault. The question is what is the effect if one moves the trace of the fault to the southwest, away from the Plant. He noted that ground motion modeling of the hanging-wall effect predicts that moving the trace of the fault away from the Plant by one or two kilometers would likely cause the ground motions go up, which is in the opposite direction suggested by the Curran/Bird letter.

Dr. Gordon Seitz, of the California Geological Survey and a Member of the CPUC Independent Peer Review Panel (IPPR) was recognized. He asked, what would be the geodetic correction if the slip rate on the Hosgri Fault was raised from 1.7 to 3 millimeters a year. Dr. Marshall replied that the SRT had tested a range of scenarios and found that the overall contraction pattern across the Irish Hills would change very little even if one were to double the slip rate on the Hosgri Fault. The contractional signal is controlled by the geometry and slip on the San Andreas Fault and is relatively insensitive to an increased rate on the Hosgri Fault. Dr. Marshall observed that the contraction of the Irish Hills is masked primarily by the transition of the San Andreas Fault from creeping to locked at Parkfield, California. Modeling by the SRT, and previously by Titus and others, shows that the Irish Hills are in the extensional quadrant of this San Andreas deformation signal.

Dr. Budnitz asked Dr. Marshall how sensitive the contraction and extension described by Dr. Marshall was to the work of subtracting out the San Andreas Fault, as when one looks at this little effect buried on top of this huge effect and whether what is seen now at the San Andreas Fault might be different a thousand years from now or may have been different a thousand years ago, or is the understanding of the San Andreas Fault sufficiently robust. Dr. Marshall stated the total amount of contraction observed by GPS across the Irish Hills depends on how one models the San Andreas Fault, but the San Andreas Fault has sufficiently well-known slip rates and geometry that he was comfortable in stating that any reasonable set of parameters for the San Andreas fault would produce extension in the Irish Hills, but because the San Andreas Fault is

some distance away, any details involving the slip on that fault system, the geometry of the fault, or the locking depth are going to make the most significant differences nearest to the San Andreas Fault. Dr. Marshall continued that far out where the Irish Hills are located any changes in the San Andreas parameters will produce effects that are reduced in magnitude and more spatially constant. Dr. Marshall stated as long as one has geologically appropriate slip rates and locking depth, if the work is performed by someone else using a slightly different model, they should get a very similar result. He reported that is one of the recommendations made to PG&E by the SRT, that is, this type of modeling could be updated with a new and detailed model of creep on the San Andreas Fault, but he stated that the SRT is confident that it has presented something that is robust, but again, the fine details could be modulated by new data. Dr. Marshall stated the slip rates on the San Andreas Fault are not 100% known, but they are known well enough and while the slip rates on the faults near the Plant are poorly constrained because often times there are no studies where trenches were dug across the faults (a method geologists use to estimate fault slip rates), the best estimate is the uplifted marine terrace which he stated is a very good marker. He remarked the San Andreas Fault has been studied many times and the rate is so much faster, and it is easier in context of geodesy to observe something that is moving 30 millimeters per year compared to something that's moving less than 1 millimeter per year. He observed that the uplifted marine terraces near DCPD are excellent constraints on the fault slip rate and it is rare in the sense of the geological record to have something that is that well-preserved.

Dr. Budnitz observed and Dr. Marshall confirmed that one of the SRT's recommendations goes to a more advanced modeling of the San Andreas Fault and geodetic data. Dr. Marshall stated the SRT's principal recommendation is that one cannot use two or three GPS stations and from that data sufficiently constrain how fast a fault or fault system is moving, but what PG&E could do is to look across the region and ensure that when a regional fault model is developed that a kinematic or mechanical based model is also developed that includes all the faults in the hazard model moving at the rates that they are supposed to move. The overall goal is to make sure that the model is not predicting more motion than what GPS data records. The sum of all the deformation of all potential earthquake sources should not exceed what the GPS has measured, and he stated that this is essentially the SRT's recommendation, that is, to take the entire source model, make it into a kinematic and/or mechanical model, and compare it directly to the GPS data.

XVII PUBLIC COMMENTS AND COMMUNICATIONS

Dr. Peterson invited members of the public to address the Committee

Ms. Jane Swanson of San Luis Obispo Mothers for Peace was recognized. Ms. Swanson expressed her understanding that all parties seem to agree that there is an active thrust fault directly beneath the Plant and that its capability has not been evaluated. She observed, in the light of the lack of any demonstrated need for the energy produced by Diablo Canyon including that this concession was made by a California Energy Commission official at the meeting of the Diablo Canyon Decommissioning Engagement Panel on September 24, 2025, it seems to her foolhardy to keep the Plant running without knowledge of the potential of that thrust fault.

Ms. Swanson continued her comments by stating the Trump administration has, through its highly promotional Executive Orders last May 2025 and its unprecedented firing of Nuclear Regulatory Commissioner Christopher Hanson in June 2025, left no doubt that California can no longer look to the NRC for independent expertise on seismic or other safety matters. The reliance on federal safety regulation that was written into California Senate Bill 846²⁷ therefore no longer holds and Californians are going to have to expect much more original and independent work from the DCISC than might have once been the case. The NRC, undermined by the current President, is not a credible source of safety standards. She stated the local community is counting on the DCISC to do very thorough and independent work.

Dr. Jordan responded to the first part of Ms. Swanson's comments about the characterization of the thrust fault. He concurred that there is a thrust fault beneath the Plant but he did not agree that there is no understanding of the seismic capability of that fault. He stated the best constraints on the slip rate of thrust faulting beneath the Irish Hills are the well-studied terrace data showing an uplift rate of about 0.2 millimeters per year; this constraint gives a slip rate about an order of magnitude less than what Dr. Bird has advocated in his critique.

Ms. Linda Seeley of the San Luis Obispo Mothers for Peace was recognized. She stated at the June 2025 DCISC public meeting Dr. Jordan made a statement that fault under the Plant has never been fully evaluated and he inferred that there was a certain known slip rate, but the SRT was not charged by the DCISC to fully evaluate that fault or faults. Ms. Seeley stated her belief that it would be prudent for the DCISC to have the SRT do a full evaluation of the fault in light of the fact that PG&E has not done so.

Ms. Seeley stated the San Andreas Fault is well known and studied, but she stated she believes and has read that the San Andreas Fault is capable of producing an 8.0 magnitude earthquake or even larger. She stated that with the Tohoku Earthquake in Japan the fault was further away from Fukushima Daiichi Nuclear Power Plant than DCPP is from the San Andreas Fault, although she stated she knows that Diablo Canyon does not have the back-up generators in the basement as did Fukushima, the Plant is 85 feet above sea level, and that DCPP is not Fukushima, but it does need cooling water to operate every day and it could be very damaged in a big earthquake. She stated she appreciates the work of the DCISC and is glad for the SRT's nine recommendations for PG&E, but she does not know if PG&E must abide by the Committee's recommendations and it is her hope that PG&E follows the SRT's recommendations.

Ms. Seeley commented relative to the Independent Peer Review Panel (IPRP) that it was her belief a report by the IPRP was to be forthcoming and Mothers for Peace has been waiting for a long time and it is her assumption the SRT would work with the IPRP and she wonders whose

²⁷ On September 2, 2022, Governor Newsom signed California Senate Bill 846, codified as Public Resources Code Sections 25233, 25233.2 and 25302.7, Public Utilities Code Sections 712.1 and 712.8, and Water Code Section 13193.5 which, together with the approval by the CPUC on December 14, 2023 of Decision 23-12-036, provides for the conditional extension of operations at Diablo Canyon beyond the current retirement date, up to five additional years, that is no later than October 31, 2029 for Unit 1 and October 31, 2030 for Unit 2, under specific conditions as provided by the legislation including approval by the NRC of extending the operating licenses for Diablo Canyon.

conclusions matters, who has authority to do anything about any of these reports and if necessary pause operation of DCP.

Dr. Jordan, at Dr. Peterson's request, replied and stated he agreed there are things not known about the fault beneath the Plant; more should be learned and some of the SRT recommendations are directed to that end. Concerning the San Andreas Fault, Dr. Jordan stated he was not so concerned with the San Andreas Fault and believes it is properly represented in the PG&E model. Concerning Ms. Seeley's comment on the Tohoku Earthquake he stated it should be remembered that the damage done to the Fukushima Daiichi plant was caused by a tsunami, which would not be generated by an event on the San Andreas Fault, and he is not concerned that the PG&E has mischaracterized the San Andreas Fault.

Dr. Peterson stated the Committee has endorsed the nine recommendations from the SRT report and will be learning from PG&E how they plan to respond to those recommendations. Beyond that the DCISC will continue its various monitoring activities and follow developments on seismic safety. Dr. Peterson observed that the Committee's motivation and its substantial investment and effort over this past year has significantly improved the Committee's understanding of the seismic hazard and he remarked that as a result a road map for additional research will be valuable and lead to a better understanding.

Dr. Meshkati thanked Ms. Swanson for her comments and observed at the June 2025 DCISC public meeting he had made similar comments in light of the recent executive orders on the erosion of NRC having unfortunately made the job of the DCISC even more serious. Dr. Meshkati commented on the discussion from the previous session about the need to reach out to the PG&E SNO Committee to learn more because the NRC is not going to do that. He observed the DCISC now has more responsibility than it did in May 2025 because of those four executive orders. He requested Ms. Seeley and those with similar concerns to come to the podium and voice their concerns.

Dr. Scarlat stated there are many independent entities that play a role in a balanced evaluation of how to ensure safety and the Committee and the public should not be absolving the NRC of that responsibility. Dr. Scarlat remarked that earlier in this meeting the results of the summary of NRC inspections were presented and those inspections are continuing, but she observed this does not lighten the responsibility of the Committee and she thanked the public for staying engaged.

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson stated he has been following this controversy for quite some time and he offered as a caution the need not to be so bound by the emotional responses, but to be rational and to carefully analyze what is occurring. He commented he strongly believes that the SRT has followed that focus in its careful analysis and the SRT has carefully answered all objections. He observed that Dr. Bird is very persistent in pursuing his views even though there are clear indications that he is stretching the truth, in particular concerning his view that slip rates are much greater than they actually are. He reiterated that the focus should remain on a rational analysis and he thinks the SRT is pointing the public in the right direction to do that rational analysis, but he asked those present to also please remember a point raised multiple times during the 17 years that he has attended

DCISC public meetings, and that is that the area beneath DCPD is probably the best characterized of any area around a nuclear power plant in the world. There have been very large numbers of studies and he knows that the opponents of the Plant want to instill fear because with fear rationality shuts down and he stated he strongly disagrees with such an approach.

Dr. Chris Madugo of PG&E was recognized. Dr. Madugo stated concerning the fault beneath the Plant that its existence has been known for decades and it has been studied for decades. He reported it was included in PG&E's seismic hazard assessments, most recently the 2024 Updated Seismic Hazard Assessment, and the 2015 Seismic Hazard Probabilistic Seismic Hazard Analysis, a Senior Seismic Hazard Analysis Committee (SSHAC) Level 3 seismic hazard assessment. It was also included in the sensitivity study for the 2014 AB 1632 studies and also included in the 2011 Shoreline Fault studies. He reported over this time more information has been gathered on this fault and the SRT has acknowledged that this is a known fault.

Dr. Madugo stated he also wanted to address the term "directly beneath the Plant." As was just discussed previously, he stated if the fault is located directly beneath the Plant that would reduce the hazard slightly. In terms of the PG&E response to the SRT he stated he would comment further on the following day during the Committee discussion of the SRT's reports.

Dr. Budnitz observed one of the members of the public in making comments stated that a belief that Dr. Bird was stretching the truth. Dr. Budnitz stated he believes that is an inappropriate characterization as Dr. Bird is struggling like all seismologists do with some very complex information, data and modeling and he has come to an interpretation that almost no one else in the seismic community agrees with. But Dr. Budnitz stated that this does not constitute stretching the truth rather it is the way science is advanced. Dr. Budnitz remarked that Dr. Bird may be wrong, but that is very different from stretching the truth.

Dr. Budnitz commented the other subject he wanted to address had to do with the Nuclear Regulatory Commission concerning which he also made comments at the June 2025 public meeting expressing grave concerns about the future of the Nuclear Regulatory Commission, especially regarding the Office of Research. He stated the administration has eliminated the federal Environment Protection Agency's Office of Research and he stated he fears that the NRC Office of Research could also be eliminated. He stated he has a reason to understand the ramifications of such an action that better than most because he was once the Director of that office. Dr. Budnitz stated that what the administration is trying to do with its executive orders is to expedite the licensing of advanced reactors and there is very little in the executive orders that deal with the way the NRC now licenses and regulates the approximately 100 operating U.S. commercial nuclear reactors. Dr. Budnitz stated it has been his observation that the NRC staff are continuing to do technically strong work including concerning reviewing Dr. Bird's contentions. Dr. Budnitz stated that although he has a grave concern about the NRC's long-term future, he does not have a short-term concern that the NRC is going to permit an operating plant to continue to operate when it should not do so.

Dr. Budnitz stated that as this will be his final meeting with the DCISC as a member he wanted to say that the contribution made to the Committee's deliberations by those opposed to DCPD's operation for reasons that they have explained has been entirely positive all this time. He stated

that very little of their arguments get the facts wrong and he remarked the disagreement lies in what the facts mean.

Dr. Scarlet stated she wanted to comment on one of the previous public comments concerning facts and emotion and she observed there is more to the discussions in which the DCISC engages, there is the matter of how to trust the interpretation of the data and independent review is part of that equation and the dialogue is part of that equation.

Mr. David Weisman representing the Alliance for Nuclear Responsibility was recognized. Mr. Weisman remarked the discussion related to SB 846 began several years ago and he remarked SB 846 includes provisions relevant to a loan covenant for a \$1.4 billion taxpayer funded loan to PG&E including the requirement that PG&E will perform an updated seismic analysis. Mr. Weisman stated that this legislation also provides for the DCISC to consult with and consider and take into its assessments the work of the IPRP. Mr. Weisman observed that in August 2024 the IPRP stated in its report on PG&E's Updated Seismic Assessment that the IPRP could not reach a conclusion until PG&E responded to a number of enumerated points in the IPRP's report. He remarked it has now been well over a year since then and the DCISC has conducted deliberations and made decisions on the seismic safety of the Plant absent having the IPRP's final analysis. He stated his question concerns when the focus will return to what is actually mandated by law, that is, the DCISC responding to the IPRP response to PG&E. He commented there are Department of Water Resources representative here today, and he wonders why taxpayers who have given PG&E \$1.4 billion in the form of a completely forgivable loan have not received an answer to the seismic questions that were articulated in SB 846. Mr. Weisman stated he is unsure where this responsibility lies and he wonders when the IPRP will be heard from because as it is left in the public record in IPRP Report No. 16 that the IPRP cannot reach a conclusion until they have had answers to their questions. He stated the DCISC may have made its conclusions, but the IPRP has not and perhaps the Department of Water Resources needs to investigate and see what the bureaucratic or administrative log jam may be preventing the public from getting answers.

Ms. Jill Zam Ek a resident of Arroyo Grande, California, was recognized. Ms. Zam Ek stated that the NRC has been captured by the current administration and in July of 2025, the Trump administration devastated the competence and independence of the NRC by elevating production of nuclear energy over safety, slashing staffing levels, and requiring reduction of regulations and also by firing the Commission's strongest safety advocate, former Commissioner Christopher Hanson. Ms. Zam Ek stated the NRC can no longer be trusted to provide a thorough unbiased assessment of the earthquake risk at Diablo Canyon as required by SB 846. She stated that as the DCPD reactors are built above a thrust fault, and Dr. Bird asserted there is a risk of a serious earthquake causing an accident at Diablo Canyon and that this is unacceptable and immediate shutdown of the Plant is warranted. She observed at the June 2025 DCISC public meeting Dr. Jordan stated the SRT agrees that there is an active thrust fault beneath the Plant and she stated the questions concern the capability of the fault, the recurrence interval for large earthquakes and how large could those earthquakes be and she stated that this assessment has not been done. Ms. Zam Ek stated her question for the Committee is why it has not been done and she queried how the DCISC could make its determination of the seismic safety without this information. She stated SB 846 also calls for a seismic assessment by the IPRP and her

understanding is that this report has been completed but not yet published and she asked if anyone can report on the status of the IPRP assessment.

Dr. Peterson thanked all the members of the Seismic Review Team for their efforts and he reported the Committee will discuss its next steps tomorrow. Dr. Peterson thanked all those present and announced that the Committee would reconvene at 9:00 a.m. the following day.

XVIII ADJOURN EVENING MEETING

The Chair adjourned the evening session of the DCISC at 6:40 p.m.

XIX RECONVENE FOR MORNING MEETING

The morning meeting of the DCISC was convened by the Chair at 9:00 a.m.

XX COMMITTEE MEMBER COMMENTS

There were no comments by Members at this time.

XXI DISCUSSION BY THE COMMITTEE

Dr. Peterson stated the Committee would once again take up discussion of the August 2025 Fact Finding Report concerning revising the wording of the recommendation contained in that report. Dr. Meshkati commented that the issue concerns the agreement of his fellow members on the importance of having periodic meetings with selected members of the PG&E Board of Director's Safety and Nuclear Oversight Committee (SNO). Dr. Meshkati remarked that his support of future meetings with the SNO Committee stems from his extensive experience with the importance of corporate board responsibility for, and oversight of, human factor and workforce safety-related issues while serving as an expert advisor and a member of a number of investigatory bodies and offering public testimony on those issues. Dr. Scarlat stated she strongly agrees with the points made by Dr. Meshkati on the importance of safety as a part of corporate governance. Dr. Peterson observed that it is his expectation that within the SNO Committee a certain subset of members would be focused on nuclear safety matters. Following this discussion, the following two recommendations were adopted by the Committee:

Recommendation to the Committee: "The DCISC should try to meet with members of the Safety and Nuclear Oversight Committee of the PG&E Board to review matters related to Nuclear Safety Culture at the corporate level." [This recommendation was subsequently closed during the discussion of the Open Items List.]

Recommendation to PG&E: "PG&E should support and facilitate regular meetings (in-person or remotely) between the DCISC and designated members of the Board of Directors' Safety and Nuclear Oversight Committee (SNO) to learn about the Board's safety-related goals, priorities, administrative oversight, and budgetary policies vis-à-vis DCPP, and to review and coordinate strategic issues affecting the Plant's equipment systems and occupational safety."

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson stated he strongly supports the Committee's initiative and has studied the fatal accident that occurred at the Arkansas Nuclear One Power Plant and commented that the accident report on that incident lacked clarity. Mr. McWhorter commented that the Arkansas Nuclear One accident was an industrial safety accident not a nuclear accident.

On a motion made by Dr. Peterson, seconded by Dr. Meshkati, with Dr. Scarlet abstaining, the August 12-13, 2025 Fact Finding Report was approved.

Discussion of Future DCISC Actions, Initiatives, or Recommendations Based on the Results and Continuing Work of the Seismic Review Team's Review of the Seismic Hazard at the DCPD Site and Environs.

Dr. Peterson reported the SRT in its reports made nine recommendations which the Committee endorsed at its June 2025 public meeting. Dr. Meshkati expressed his thanks to Drs. Jordan, Oskin, and Marshall for their excellent reports and he commended PG&E for its receptiveness to the recommendations. He commented as an unintended consequence of the SRT's interaction with PG&E that PG&E has extended invitations to Dr. Marshall and Dr. Oskin to consider engaging in further studies. Dr. Peterson read a quote by Dr. Gene Rochlin concerning high-reliability organizations which he commented is germane to how the Committee views seismic issues at DCPD in context of cultural safety as "a dynamic inter-subjectively constructed belief in the possibility of continued operational safety, instantiated by experience, with anticipation of events that could have led to serious errors, and complimented by the continuing expectation of future surprise. Rather than taking success as a basis for confidence, these operators and their managers maintain a self-conscious dialectic between collective learning from success, and the deep belief that no learning can be taken to be exhaustive, because the knowledge base for the complex and dangerous operations in question is inherently and permanently imperfect." Dr. Meshkati remarked Dr. Rochlin and his colleagues at U.C. Berkeley are considered to have given birth to the concepts related to high reliability organizations.

Dr. Peterson and Mr. Rathie reported that the DCISC's plan is to retain the SRT as a three-member body to enable the SRT to review the PG&E response to the Committee's 35th Annual Report and then to release Dr. Oskin and Dr. Marshall to pursue other research opportunities, possibly in connection with seismic research conducted by PG&E concerning DCPD or otherwise. Mr. Rathie reported that a resolution has been prepared on behalf of the Committee that commends the SRT for its contributions, accepts the SRT June 2025 Report and the SRT comments on the June 26, 2025 letter from Mothers for Peace, and directs inclusion of the nine SRT recommendations made in the June 2025 Report in the Committee's 35th Annual Report. On a motion by Dr. Peterson, seconded by Dr. Meshkati a motion was made to adopt Resolution 2025-12 and discussion followed,

Dr. Budnitz reviewed the steps to follow including PG&E's obligation under the DCISC Charter from the CPUC and Public Utilities Code §712.1 to respond to recommendations made by the DCISC in its Annual Reports. Dr. Budnitz remarked that after the DCISC sends its 35th

Annual Report to PG&E much of the further action by the SRT will depend upon these responses.

Dr. Chris Madugo of the PG&E Geosciences Department was recognized. Dr. Madugo stated he is in charge of seismic source characterization research for PG&E under the Long Term Seismic Program. Dr. Madugo thanked the SRT for its work. He stated the Long Term Seismic Program (LTSP) creates a venue to evaluate new data recommendations and the LTSP research program is prioritized each year. Dr. Madugo referred to the SRT recommendations and stated PG&E is in the process of understanding and evaluating them and will prepare and provide its official written response once the 35th Annual Report is received. He commented PG&E has met with the SRT to review each recommendation and is working on a simplified sensitivity model that could potentially be used to test the recommendations for their hazard and risk significance. He stated PG&E is also working on simplified kinematic models that support the three different geometry models for faulting in vicinity of DCP. He stated PG&E is also evaluating the recommendations in terms of hazard significance qualitatively to assess whether there is a potential for a significant impact on the hazard. He observed some of the SRT findings, unlike those of Dr. Bird, would have only a minimal impact on the hazard and he gave an example of the ground motion uncertainties in this context and he reported PG&E places most of its research budget on reducing uncertainties and he commented the SRT did not really touch on those items, focusing instead on the issues raised by Dr. Bird. Dr. Madugo stated work to address the recommendations will be based upon hazard significance and the feasibility of getting a meaningful answer with small enough uncertainties. He reported the SRT recommendation fall into two primary categories, with the first being the SRT's different interpretations of what could be going on beneath the Plant and the second being the geodetic work that helps to validate and test PG&E's models.

Dr. Peterson stated that once the DCISC receives PG&E's formal response, the prioritization of the work on the SRT's specific findings should be driven in large part by uncertainties related to hazard for the Plant. He commented that the SRT will then be in a good position to advise the Committee about PG&E's recommended priorities and the areas on which PG&E will focus going forward and the DCISC can use the SRT's expert advice to ultimately reach conclusions about those priorities. Dr. Madugo stated he wanted to provide some context on that specific item. He reported by the end of the year PG&E will have completed an uncertainty analysis for the model that was developed for the 2024 Updated Seismic Assessment [prepared in response to SB 846] and the uncertainty analysis will employ tornado plots²⁸ for all the source and ground motion parameters and this can show where the SRT recommendations fall on the plot in terms of hazard significance.

In response to Dr. Meshkati's question as to what the SRT expects to see when PG&E formally responds to the nine recommendations, Dr. Jordan replied that the work of the SRT was in a very limited sphere regarding the hazard and did not prioritize the recommendations. He stated that prioritization needs to occur in a larger context of the issues that control the hazard

²⁸ A tornado plot or diagram is a visual tool used to measure risk and impact. The tornado shape indicates how risky or impactful something is. The longer the bar on the tornado diagram, the more sensitive the outcome is to that variable.

and the uncertainties in the hazard and the approach described by Dr. Madugo is acceptable to the SRT.

Dr. Scarlet remarked that Dr. Madugo made references to budget priorities and she inquired whether PG&E has the resources available for its seismic effort. Dr. Madugo replied in the affirmative, but he stated in context of the seismic assessments there is a trade-off with follow-up from various review groups and determining the feasibility of doing follow-up and some resources are taken from hazard significant items for those assessments. Concerning the budget for the LTSP, at a high level it is divided between ground motion and seismic source characterization and he commented uncertainties for ground motion items are much larger than for the seismic source characterization items, due in part to the decades of work focused on studying the faults around the Plant. Dr. Madugo commented one of the SRT recommendations concerns the deformation rate of the San Luis Bay Fault which would require dating offshore marine platforms and he commented any work done offshore is very expensive. He commented the hazard impact of this work would likely be low and there may be an alternative by building out the model to consider the additional rate that could be occurring.

Dr. Budnitz remarked the NRC placed a licensing condition on DCPD in 1985 requiring PG&E to undertake and fund the LTSP and if funding for the LTSP were lacking this would be an issue the NRC would be required to address and accordingly he commented PG&E does not work in a vacuum concerning the LTSP as it is reviewed by the NRC, the DCISC and the IPRP.

Ms. Rochelle Becker of the Alliance for Nuclear Responsibility was recognized. In response to Ms. Becker's questions, PG&E's Mr. Jearl Strickland replied that it is his understanding that the CPUC has never denied funding for DCPD seismic studies. Mr. Strickland confirmed that substantial budget allocations have been provided for PG&E to continue maintaining a well-staffed Geosciences Department as well as to fund research contracts with state agencies and research groups.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman observed that SB 846 reserves a role for the IPRP in assessing the seismic hazard at DCPD and the DCISC is mandated by the state to take into account the work of the IPRP and to incorporate in its reports the work of the IPRP. He observed that neither the SRT nor Dr. Bird are addressed in the legislation and he commented he believes it is the IPRP's input that deserves much merit as the IPRP is the people's official representative.

Following this discussion, Resolution 2025-12 expressing appreciation to the SRT and taking actions regarding the SRT's reports and in connection with the future review activities of the SRT was unanimously adopted.

XXII INFORMATIONAL ITEM PRESENTED BY THE SAN LUIS OBISPO COUNTY OFFICE OF EMERGENCY SERVICES

Dr. Peterson introduced Ms. Kelly Van Buren, County Emergency Services and Nuclear Preparedness Manager.

Update by the San Luis Obispo County Emergency Services & Nuclear Power Preparation Manager Ms. Kelly Van Buren on County Emergency Services' Activities, Local Emergency Planning, and County's Relationship with DCP.

Ms. Van Buren remarked the role of the San Luis Obispo County Office of Emergency Services (OES) is often not well understood by the public as during nonemergency periods much of its activities are related to planning, drafting standard operating procedures, and equipment maintenance, but the organization transforms during emergencies to coordinate a response with other agencies. Dr. Peterson remarked the statistics for the consequences of natural disasters have greatly improved significantly over time and he attributed this to the development of highly competent emergency response capabilities and he stated society owes a debt to those individuals who choose to work in this field.

Ms. Van Buren reviewed the OES' office organization and reported it is designed to prioritize the nuclear power plant response planning and as the Nuclear Power Preparedness Manager she supervises a staff of four to five full-time individuals and she credited DCP for providing generous funding for the OES. She reported OES is also currently doing work on planning for tsunamis, fires and earthquakes and during the past summer was involved in responding to the two wildfires in San Luis Obispo County which were the biggest in California this past year.

Ms. Van Buren reported earlier in 2025, OES unveiled county-wide emergency Evacuation Zones which were similar in concept to nuclear plant Protective Action Zones, The Evacuation Zones enable OES to communicate quickly to the public concerning response to an emergency and in response to Dr. Peterson's query, she confirmed wildfire would likely be the most probable use of the Evacuation Zones. In response to Consultant McWhorter's comment Ms. Van Buren stated the Evacuation Zones were not coextensive with the Protective Action Zones and she acknowledged that the Evacuation Zones are used by many California counties, but San Luis Obispo County is the only county in California with nuclear Protective Action Zones there has been some confusion on the part of the public and the OES is working through communication challenges and there is no intention to change the Protective Action Zone designations.

Ms. Van Buren stated two alert notification systems have been added to OES capabilities for emergency planning. ALERTSLO is used for lower level emergencies and is a sign-up program, reverse 9-1-1 program which is used for emergencies that do not require protection action, and wireless emergency alerts which send an alert through cellphones and she commented that wireless emergency alerts will be incorporated into nuclear power plant planning. Ms. Van Buren reported OES also uses Non-weather Emergency Messages (NWEM) a system run by the National Weather Service which she stated is important because some people do not have cellphones and weather radios have better coverage in the area.

Ms. Van Buren reported the Emergency Operations Plan is being updated together with its 28 associated hazard-specific annexes of which 12 have been completed during 2025 and the project should be completed within 18 months. She reported a mass care facility has been established for sheltering up to 300 persons without the assistance of outside agencies.

Ms. Van Buren reported the OES Emergency Operations Center (EOC) is located on the first floor to PG&E's Emergency Operations Facility (EOF) but certain processes are separate while some are integrated and this proximity allows communication and coordination between the County and PG&E. She stated the Command Group, that is, the offsite decision makers operate as a unified team which is made up of San Luis Obispo County staff including the County Administrator, the Sheriff, the County Health Officer and the Fire Chief and a DCPD advisor is assigned to the Command Group. She reported corrective action decisions are reached by an integrated process while the field monitoring teams are County-DCPD joint teams and the unified dose assessment teams are unified with the participation of the DCPD, the County, and state and federal officials. The operations in the Joint Information Center are under DCPD and the County and allow participation by state, federal, cities, and special districts.

In response to Dr. Scarlat's questions, including as to the planning for evacuation of prisons, Ms. Van Buren responded there are no prison facilities within ten-mile²⁹ Protective Action Zones and concerning the California Men's Colony, a high security prison, the state bears responsibility and she stated the plan is to shelter in place and the state has a supply of potassium iodine stockpiled as there is nowhere else in the local community able to house those prisoners.

Ms. Van Buren reported schools have the authority to make evacuation decisions and OES would communicate with the schools at the alert level and detailed plans are in place for moving students and relocating schools in advance of any protection action decision. Schools have been provided with training and with radios and satellite phones to facilitate communication with the EOC. Information on the County's assessment of school preparedness may be found in the formal exercise evaluations.

In response to Dr. Scarlat's observation that the California Department of Health's nuclear response planning provides at the alert level for the closing of beaches and parks and the relocation of students in schools and lockdown of prisons, Ms. Van Buren reported at the alert level the evacuation schools is not an automatic action as that decision would be dependent on the nature of the alert she stated schools do not stockpile potassium iodine and its distribution to children is complex and is one of the reasons for relocation earlier in an emergency. Ms. Van Buren stated the County EOC is staffed by a County Agriculture representative at the Unified Dose Assessment Center and there is a process for preventative agriculture measures in advance of protective actions and she stated there is a balance in having agricultural producers take preventative actions to reduce potential contamination while a decisions on protective actions may be pending and OES conducts exercise involving County Agriculture and works with the California Highway Patrol and local law enforcement to ensure until a release is issued that a hold is placed on agricultural products. She reported compensation for economic losses is coordinated through the federal government but it is not a quick process. In response to Dr. Scarlat's query Ms. Van Buren stated that there were no formally recognized indigenous tribes

²⁹ The first emergency planning zone is a plume exposure pathway extending about 10 miles in radius around the reactor site. Protective action plans within this area are designed to avoid or reduce dose from potential exposures such as inhaling radioactive particles. These actions include sheltering, evacuation, and the use of potassium iodide pills where appropriate.

within any Protective Action Zones and she did not believe the areas included within Santa Barbara County included tribal areas.

Ms. Van Buren reported evaluated emergency exercises are rotated on an eight-year cycle with different exercises conducted with differing frequencies and she reported the Northern Evacuee Monitoring and Decontamination and the French Hospital Medical Exercises were conducted recently in 2025. For 2026 a Plume Pathway and another hospital drill with the Marian Medical Services are planned, and for 2027 an Emergency Worker Monitoring and Decontamination Exercise is planned.

Ms. Van Buren reported on aspects of the Nuclear Power Plant Program that have been recently updated. A household pet response component has been added and incorporated into the monitoring and decontamination response plan and two exercises, one for people and another for pets, have been conducted in cooperation with the County Animal Shelter and the exercise went well, passed federal regulation review, and new software has been purchased to allow OES to track where pets are being sheltered. Ms. Van Buren stated the field monitoring teams now have new larger vehicles and communications have been switched to satellite internet with tablets to be able to provide real-time updates with field measurements to the decision makers at the EOC.

Ms. Van Buren reported that the County has built a new co-located dispatch center for the Sheriff and Fire Departments and while the activation of the siren system will remain within the EOC, it will also be with the watch commander in North County and accordingly DCPD has moved the North County siren activation system to a different location. Software updates have been made to Incident Management System and she commented because the County makes decisions for all the Evacuation Zones the cities located within the zones have given up authority to the County to make decisions and she stated it is important that information be shared with the cities and the new software allows the cities to receive status updates in real-time and the entire system has been upgraded and rebuilt to provide that capability. Ms. Van Buren reported that a new command and supply trailer has been purchased and is being equipped to be used solely in connection with a hostile action based response. Regarding information management a Geographic Information System (GIS) technician is now part of OES staff to do mapping, data analysis, as well as demographic analysis and evacuation timing. **In response to Dr. Peterson's query Ms. Van Buren reported OES has not incorporated AI with respect to DCPD emergency response, but OES is open to doing so and expects to review the issue in the future. Dr. Peterson stated the DCISC should follow OES' progress with implementing AI solutions in context of its review of a wide array of different AI applications which could affect DCPD operational safety.** She reported OES is in the process now of upgrading the Notification System design report and stated traditionally back-up to the emergency siren system was provided by route alerting, OES has now incorporated wireless emergency alerts through cellphones in the event of a protective action being taken. In response to Consultant McWhorter's question Ms. Van Buren replied the wireless emergency alert system is a specific element of IPAWS [Integrated Public Alert and Warning System].

In context of the relationship between County OES and DCPD Ms. Van Buren reported OES and DCPD are highly integrated in a valued reciprocal partnership which is constantly evolving and remains much of her fulltime focus and responsibilities. She reported agreements

are in place to define respective contributions and roles and she observed that DCPD is extremely supportive of the OES and San Luis Obispo County and the financial support provided allows OES to be creative and innovative. Ms. Van Buren stated DCPD includes OES in its quality verification process and this has led to the resolution of some issues over the years.

Dr. Meshkati stated there are lessons on emergency response planning to be learned from the Maui fire and from the recent fires in the Los Angeles area and he commended the McChrystal Group Report on the Los Angeles fires to Ms. Van Buren's attention and Dr. Meshkati offered to provide her with a copy. Ms. Van Buren stated OES is following very closely after action reports from Los Angeles County and had expressed concern about the software that Los Angeles County was using in advance of its use and she stated OES is aware of some of the challenges faced and she is confident OES would not have similar challenges. She remarked San Luis Obispo County benefits from the very strict federal requirements for alert notification systems and from OES' extensive experience with 64 Nuclear Power Plant Standard Operating Procedures now on file.

Dr. Meshkati asked if Ms. Van Buren had seen the draft DCISC policy "Response to Diablo Canyon Power Plant Emergencies" and she confirmed she has seen the draft policy and Dr. Meshkati requested Ms. Van Buren's feedback on the policy. Dr. Meshkati remarked he has an issue with the access provisions [to the EOC]. Dr. Scarlat commended Ms. Van Buren for OES going above and beyond regulatory requirements and seeking continuous improvement in emergency response and she observed this has broader benefits for the community and the public. Ms. Van Buren stated in its public presentations OES stresses that most of OES' equipment, systems and facilities have been indirectly paid for by DCPD and the taxpayers of San Luis Obispo County have benefitted from not having had to pay for much of the emergency planning over the years.

In response to Consultant Lisa Darden's inquiry concerning the short-term effect associated with the federal shutdown and whether agreements establishing priorities are in place Ms. Van Buren stated the primary federal resource OES relies upon is for federal radiological monitoring assistance and this has continued to function and to be staffed and Federal Emergency Management Agency's radiological emergency preparedness assets are exempt from the shutdown. Ms. Van Buren remarked that OES maintains a wide variety of redundant options for information including paper copies, radios and generators on all its buildings.

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson stated he was an amateur radio operator and has worked with San Luis Obispo County in the past through the San Luis Obispo Emergency Communications Council and had worked with Ms. Van Buren when she was employed at DCPD. He commented she brings an incredible foundation to deliver high quality preparations. He stated he also works with the Red Cross and he supported OES establishing a mass care facility. Dr. Nelson stated he faults OES for not properly informing County officials relative to the probability, relative risk, and the realistic accident scenarios connected with an event including that in the event of a radiological event any release would most likely be confined to within Containment or the Plant boundaries.

Ms. Rochelle Becker of the Alliance for Nuclear Responsibility was recognized. Ms. Becker commented that a radioactive release would scare a lot of people because one cannot taste, feel or smell a radioactive release. She asked Ms. Van Buren if schoolchildren are to be evacuated in an emergency, what keeps plant personnel from using cellphones and calling their families and what keeps neighbors from calling and causing traffic problems and what is OES plan when information spreads faster than intended. Ms. Van Buren acknowledged that the issues identified by Ms. Becker have become more challenging with cellphone communication. She stated OES’s message is the quickest way to reunite families with their children who have been evacuated is to meet them at the relocation centers, but she acknowledged this is going to cause traffic concerns. In response to Mr. Rathie’s question on the use of large automated roadside signs to provide advice Ms. Van Buren stated those types of signs are generally not available in the local area other than by manually deploying smaller stand-up mobile message signs. In response to Dr. Scarlat’s question Mr. Van Buren stated the local schools are hesitant to conduct mock evacuations beyond practicing the loading of buses and she remarked OES works directly with the schools and the schools proactively provide information in packets that go out to parents at the beginning of each school year, but information is not solicited directly from parents. She reported the schools now have additional communication capabilities that they did not have years ago allowing both public and private schools to provide real time communication with parents.

XXIII DISCUSSION, DIRECTION AN ACTION, AS APPROPRIATE, BY THE COMMITTEE, CONSULTANTS AND COUNSEL

I. Discussion of Issues on Open Items List.

Dr. Peterson requested Consultant McWhorter lead a review of items on the Open Items List, which Dr. Peterson described as an important tool used by the Committee to set priorities, track and to follow issues, concerns, information requests and activities identified for subsequent action or receipt during fact-finding or public meetings. Mr. McWhorter reported newly added or changed items since the June 2025 public meeting were shown in *red italics* while items for which follow up was scheduled at the next three fact finding meetings prior to the February 2026 public meeting were shown in *yellow*, and items which were deleted or changed were shown in ~~strike-out~~ on the version of the Open Items List included with the agenda packet and certain items on the list were identified for closure. He reported the Open Items List now consists of four sections: open items, public meeting follow-up items, recommendations to the Committee, and recommendations to PG&E.

Items discussed or concerning which action was taken included the following:

<u>Open Items List</u> ³⁰		
<u>Item</u>	<u>Re:</u>	<u>Action Taken/Next Action</u>
EP-2	Observe Emergency Drills & Exercises	7/26FF NM/LAD

³⁰ Key to the abbreviations used: Fact-finding (FF), Public Meeting (PM), Quarter (Q), Nuclear Oversight Committee (NSOC), to be determined (TBD), Najmedin Meshkati (NM), Per F. Peterson (PFP), Raluca O. Scarlat (ROS), Lisa A. Darden (LAD), R. Ferman Wardell (RFW), Richard D. McWhorter Jr. (RDM), Mark Kirk (MK).

REVISED AGENDA PACKET DRAFT – FEBRUARY 8, 2026

NS-5 Monitor NSOC Exit Meetings	9/26FF ROS/RDM
SE-39 Inspect Concrete Repairs at Intake Structure	12/25FF ROS/RDM
SEC-3 Interaction of Security & Operations, Engineering, Maintenance and Emergency Preparedness & Nuclear Safety	12/25FF ROS/NM FF TBD
NR-5 Review Presidential Executive Orders re NRC DCPP-Reg.Srvcs./NRC-Reg.4/UCS-E. Lyman Impact on Operating Plants-Allocation of Resources	12/25FF & 2/26PM (Now 6/26PM)
EMB-3 U-1 RPV Compliance/Capsule B Characterization Plan After Capsule B Results Rec'd	12/25FF ROS/RDM ROS/MK Update- TBD
2/25 PM-5 Process Map (Recommendations)	2/26PM
6/25PM-4 SER for License Extension	12/25FF NM/RDM
Review RPV Embrittlement Section 4.2 of SER	MK/TBD
6/25PM-6 Implementation of AI by Engineering	Close to PI-3 or D12/24FF-3.4
6/25PM-10 U-1 RPV Embrittlement	Close to 12/25FF & EMB-3 & MK review
6/25PM-23 SRT Recommendations – Seismic Hazard Assessment	6/26PM
6/25PM-33 ASW Pump Repair & Common Cause Evaluation	1/26FF NM/RDM
D/1/25FF-3.8 Meet with SNO Committee	Close to P/8/25FF 3.1 & NS-11
P/8/25FF-3.1 Revise PG&E SNO Recommendation per 10/25PM	2/26 PM

New Item PI-4? AI Impact on Training

ROS/TBD

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson commented there was no closure indicated for the item related to a loss of offsite power and he stated he hopes to bring more information to the DCISC after he makes inquiry of CAISO on what happened on May 4, 2025.

Ms. Linda Seeley was recognized. Ms. Seeley stated it was her understanding that during the period of government shut down the NRC had suspended normal operations including routine licensing and inspections. Dr. Peterson replied that the NRC's essential functions including the Resident Inspection Program are continuing and Mr. Rathie referred Ms. Seeley to an NRC Publication dated October 1, 2025 confirming the continued oversight at nuclear power plants and fuel cycle facilities by resident inspectors.

XXIV PUBLIC COMMENTS AND COMMUNICATIONS

Dr. Peterson invited members of the public to address the Committee on matters not on the agenda for this meeting.

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson stated he previously provided the Committee with a copy of an informational sheet produced by *Comite de Energia Nuclear* (CEN) a Spanish organization as a suggestion for a **form of**

improved public outreach regarding DCPD operational status and plant health and his stated his belief this falls within the public outreach mission of the DCISC and he suggested a joint PG&E/DCISC effort. He stated Californians for Green Nuclear Power are working on legislation to extend DCPD operations beyond 2030 and he believes public outreach should be one component of this legislative package. Dr. Peterson suggested the DCISC should follow up on opportunities to provide more information on the status of the Plant.

XXV CLOSED SESSION – Personnel Matters (Govt. Code §11126)

XXVI DISCUSSION, DIRECTION AND ACTION, AS APPROPRIATE, BY THE COMMITTEE, CONSULTANTS AND COUNSEL

XXVII ADJOURN MORNING MEETING

The Chair adjourned the morning meeting of the DCISC at Noon.

XXVIII RECONVENE FOR AFTERNOON MEETING

The afternoon meeting of the DCISC was convened by the Chair at 1:30 p.m.

XXIX COMMITTEE MEMBER COMMENTS

There were no comments from members at this time.

Mr. Rathie reported the Committee Members met this morning in closed session on the item listed on the agenda and received information and provided direction. One reportable action was taken to approve entering into an Agreement for Consultant Services with Ms. Lisa A. Darden.

XXX PUBLIC COMMENTS

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson commented he learned from Dr. Peterson that some of Dr. Peterson's students at the U.C. Berkeley Nuclear Engineering Department were watching this session of the public meeting and he expressed his strong endorsement of the students' participation. Dr. Scarlat encouraged the students to engage their communities and the non-nuclear engineering students to attend the meetings of the DCISC.

XXXI INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

Dr. Peterson requested Ms. Corral to continue with the final informational presentations requested by the Committee from PG&E for this public meeting.

Ms. Corral introduced DCPD Station Director Mr. Justin Rogers to make the next presentation and Ms. Corral reported that Mr. Rogers leads a team of more than 650 nuclear professionals in the Operations, Maintenance, Chemistry, Radiation Protection organizations and in other safety organizations. Mr. Rogers began his career at DCPD in 2013, received a Senior

Reactor Operator License in 2016 and worked in increasing positions of responsibility in the Training and Outage Management organizations. Mr. Rogers is a veteran of the U.S. Navy and holds a Bachelor of Science Degree in Nuclear Energy Engineering Technology from Thomas Edison State University.

State of the Plant Update Including Organizational Changes, Significant Past and Future Plant Activities, Power History, Significant Equipment Issues, Significant Human Performance Issues, Status of Preparations for Refueling Outage 2R25, and Other Station Activities since the DCISC's June 2025 Public Meeting.

Mr. Rogers reported Unit 1 was presently operating at 100% power and Unit 2 was now on day 19 of a refueling outage. He reported all NRC Performance Indicators are in Green status.³¹ He reported Unit-1 has been operating at 100% power since exiting refueling outage 1R25 in May 2025. Power reductions for Unit-2 have taken place for tunnel cleaning and in response to wildfire activity for both the Madre and the Giffords files.

Mr. Rogers stated the NRC Biennial Requalification Inspection, a written examination for licensed operators, has been completed and the PG&E Nuclear Safety Oversight Committee (NSOC) has visited the Plant with no challenges or concerns with nuclear safety identified. He reported maintenance outage windows (MOWs) for Unit-2 emergency diesel generators (EDGs) occurred prior to the current refueling outage for all three Unit-2 EDGs. He reported an initial licensing examination will soon take place for 20 individuals.

Mr. Rogers reported Unit-2 was presently in its 25th refueling outage (2R25) which is now expected to complete in early November 2025. He stated lessons that learned during 1R25 have been incorporated and 2R25 performance is improving in comparison to 1R25. In response to Consultant McWhorter's question Mr. Rogers stated the Unit-2 High Pressure Turbine refurbishment is proceeding on schedule with the same vendor and personnel who performed refurbishment of the Unit-1 High Pressure Turbine during 1R25 having again been engaged for the work. He reported continuous milestones for schedule scoping and duration of the turbine refurbishment have been established and the project is benefitting from the work during 1R25 and for 2R25 the turbine refurbishment work was not treated as a contingency. In response to Dr. Meshkati's inquiry Mr. Rogers stated with reference to the accident which occurred to a contracted worker during 1R25, the review of that accident determined there was another way to perform the activity that resulted in the injury and actions were taken concerning briefings and requirements when contract workers are brought on to the site for outage or other work. He confirmed a cause evaluation on the incident during 1R25 was performed to look at what other hazards might be eliminated and he stated the cause evaluation would be provided to the DCISC.

Dr. Peterson questioned whether the work to replace the breakers in the 230kV switchyard, and the need to take the switchyard out of service to do the replacement, constituted a signal point vulnerability as being work that could only be performed during an outage. Dr.

³¹ The safety significance characterizations used for the Performance Indicators as either Green (very low) calling for Baseline inspection, White (low to moderate), calling for additional NRC oversight, Yellow (substantial), requiring more NRC oversight, or Red (high), requiring the most NRC oversight. A Green non-cited violation indicates very low safety significance, with no impact to public health and safety.

Peterson contrasted this with work on the EDGs where sufficient redundancy exists to allow maintenance to be performed online. Mr. Rogers replied that the work on both the EDGs and for the 230kV breaker replacement were governed by certain time durations, but the work for the offsite power circuits is much shorter, 72 hours, than for the EDGs which duration can vary but is usually 14 days. Accordingly, the extent of the work being performed at the 230kV switchyard requires more than 72 hours and can only be performed during an outage.

Mr. Rogers reported the NSOC will visit DCPD again for the third time this year. He reported Ms. Maureen Zawalick has been promoted to PG&E Senior Vice President and Chief Risk Officer, Mr. Blair Jones will be taking over Ms. Zawalick's role as Vice President of Business and Technical Services with responsibility for the Regulatory, Fuels, Finance and the non-line support organizations at DCPD. Mr. Al Bates will be taking over as Projects Director and Mr. Philippe Soenen will take over Mr. Blair Jones prior responsibilities. Mr. Mark Sciacca will be the Feedwater Heater Project Director. Mr. Rogers stated DCPD takes the matter of succession planning seriously and he confirmed Dr. Peterson's observation that these are all internal promotions. Dr. Meshkati offered his congratulations to all the recently promoted individuals and commended PG&E for promoting Ms. Zawalick .

Ms. Corral requested Mr. Rogers to continue with the final informational presentation.

Decisions Made and Their Bases for Reducing Unit 2 Power in Response to Area Wildfires in July and August 2025.

Mr. Rogers stated this was the first time in his experience a fire resulted in ramping down a DCPD unit. He stated DCPD's electrical generation goes out from the Plant through three 500kV lines, one of which goes north to the Gates Substation and two of which go south to the Midway Substation. Any two of these lines are independently capable of carrying the full output of both Unit-1 and Unit-2. In 2006 DCPD implemented a Special Protection System (SPS) that would separate a single unit from the grid in the event of the loss of two of the 500kV lines to protect the other unit and the grid.³² When the SPS is in service DCPD power output must be less than 1,700 MW combined output and with two lines out of service output is required to be less than 1,600 MW.

Mr. Rogers reported that in July 2025 during the Madre Fire in advanced coordination with the PG&E Grid Control Center DCPD coordinated to reduce Unit-2 output to 55% as the fire was impinging on and threatening the two southern 500kV lines in order that neither unit would be challenged by the SPS. Unit-2 was selected to ramp down based on time in core life between Unit-1 and Unit-2, as Unit-1 had just come online and was within the first 100 days following 1R25. A power coast-down was already planned for Unit-2 and that plan was used in connection with the Madre Fire. Following the Madre Fire a comprehensive critique was performed and a standardized meeting cadence for similar events was developed with internal

³² The California electric grid is a complex network of power plants, transmission lines, and distribution systems that provide electricity to the residents and businesses in the state. At its fundamental level, energy is generated by energy providers, bought and sold on the CAISO, and delivered to customers by the utilities.

communication strategies and dedicated points of contacts to improve the decision-making model.

Mr. Rogers stated the improvements in the decision-making model were then seen in action in connection with the Gifford Fire in August 2025 when the lines had to be de-energized and Unit-2 power was reduced to approximately 46%. He commented that the 55% power reduction for the Madre Fire was to get below the SPS setpoint of 1,700MW and with the Gifford Fire power was reduced to approximately 46% because DCPD did lose the needed lines. PG&E Director Tom Jones reported the lines were not destroyed, but rather it was the threat of smoke and arcing creating loss of the lines that caused them to be shut down. Prior to being re-energized the lines were inspected and prior to raising load on the lines and going above the SPS setpoint, thermography and flyovers were conducted to ensure confidence in the lines. Mr. Rogers reported both down power operations were completed safely with no challenges.

Dr. Scarlat inquired as to what frequency of grid instability would lead to a higher frequency of down power scenarios to which Mr. Rogers responded that DCPD normally operates at 100% power during each eighteen-month refueling cycle and each time a down power operation is conducted the Reactor Engineering organization reviews fuel usage and fuel burn-up and he reported that PG&E is taking steps toward grid hardening and to ensure plans are in place to take action and communicate concerning down power operations, but he stated it would be difficult to provide a direct response to Dr. Scarlat's query. In response to Dr. Meshkati's inquiry concerning the proactive decision making process and the cost to PG&E for the safety-related loss of power production Mr. Rogers replied that a decision to reduce power lies with the Plant at the Station Director level with input from the DCPD team, and although the action is discussed with the Grid Control Center and CAISO they do not have the power to veto such a decision and the cost of the replacement power is not a factor in the Plant's decision. **He reported DCPD has clear guidance with other entities within PG&E that addresses this interface and the decision-making associated with the Plant and the down time for the Plant and no authorization or clearance from outside DCPD is required. He offered to provide Dr. Meshkati with a copy of the guidance document at a future fact finding.**

Mr. McWhorter observed that after hearing Mr. Rogers' presentation on the differing power level reductions for the Madre and Gifford Fires, there were some corrections necessary to the September 2025 Fact Finding Report approved earlier during this meeting. Subsequently, on a motion by Dr. Peterson seconded by Dr. Meshkati, a motion was unanimously approved to amend the September Fact Finding Report accordingly.

Dr. Gene Nelson of Californians for Green Nuclear Power was recognized. Dr. Nelson commented the power lines from DCPD are designed very conservatively and a single line is about to carry about 73% of the Plant's total output and he commended PG&E for this conservatism.

Dr. Peterson thanked Mr. Rogers and all the PG&E presenters at this meeting for their excellent work in preparing their presentations.

XXXII DISCUSSION, DIRECTION AND ACTION, AS APPROPRIATE, BY THE
COMMITTEE, CONSULTANTS AND COUNSEL

Status of Governmental Agency Interactions, Discussion of Administrative and Regulatory
Matters Including Funding Matters, Consideration of Approval of Policy on Committee
Response to Diablo Canyon Power Plant Emergencies, and Other Committee Business.

Dr. Peterson requested Mr. Rathie to address this item. Mr. Rathie reported the first order of business would be to approve an Agreement for Consulting Services with Consultant Lisa Darden and to ratify the Agreement for Consultant Services with former member Dr. Robert J. Budnitz to provide for his attendance at this meeting. On a motion made by Dr. Peterson seconded by Dr. Meshkati, approval was given for both Agreements.

Mr. Rathie then reported that the day after the June 2025 DCISC public meeting, on June 12, 2025, the California Public Utilities Commission (CPUC) approved its Decision in Phase 2 of the rulemaking proceeding opened in response to SB 846 to address the extension of DCPD operations until 2030. He reported at the DCISC's June 2025 public meeting the Committee Members conditionally approved a draft of a Fourth Restated Charter for the Committee with the condition that nothing in the anticipated CPUC decision would be contrary to the draft approved at the June meeting. He reported that this condition was satisfied by the terms of the Decision and the Fourth Restated Charter for the DCISC was submitted to the CPUC by PG&E as directed by the Decision in Phase 2 and as of October 5, 2025, the Fourth Restated Charter was now in effect. He reported, as the Decision in Phase 2 also closed the rulemaking proceeding, many of the initiatives undertaken pursuant to SB 846 are concluding or in the process of concluding.

Mr. Rathie reported that in September 2025 the California Attorney General announced the appointment of Dr. Scarlat to a three-year term on the Committee expiring on June 30, 2028, to succeed Dr. Robert J. Budnitz. He reported all the reports of the DCISC Seismic Review Team have been provided to the CPUC Independent Peer Review Panel and he reported that Dr. Meshkati has had recent discussion with the California Energy Commission, his appointing entity.

Mr. Rathie referred to funding for the Committee's operations and stated the Committee needs to always ensure it has sufficient funding to continue to meet its obligations. He reported 2025 will be the final year during which the DCISC will receive supplemental funds for its operations from the Diablo Canyon Transition and Relicensing Memorandum Account (DCTRMA) which, during calendar years 2023 through August 26, 2025, has provided supplemental funds for relicensing and the transition activities to extended operation and related matters. Mr. Rathie reported that PG&E also agreed to provide additional funding under the DCTRMA for the work of the DCISC Seismic Review Committee. He reported that the Committee's expenditures vary throughout the year and he reported on the financial projects for 2025 and for 2026 when the Committee will be under a new funding methodology based upon the average of its expenditures for calendar years 2023, 2024 and 2025 with an escalator for cost of living increases. He stated it is his belief that this will result in more funding being available for its operations than under the current method which is based upon the funding provided for the Committee's operation in 1996 with a 1.5% escalation each year. He further reported that under

this new methodology the Committee will receive reimbursement in the next calendar year for overspending in the prior calendar year, if any. Any funds unspent in a calendar year will continue to be remitted to PG&E after the end of the year for credit to the entities providing funding for the DCISC and he reported this has been the Committee's practice since its inception. He stated it was his recommendation that the Committee continue to be conservative in its expenditures.

In concluding his remarks, Mr. Rathie reported the DCISC website has received visitors who come mainly from the United States, followed in order of visits from China, Singapore, Germany, South Korea, India, and Romania. The website has received to date in 2025 an average of 343 visits each month and that number increases, as one would expect, in the months when the Committee conducts a public meeting.

Mr. Rathie requested Mr. McWhorter to continue the discussion concerning a draft Committee policy addressing a DCISC role and response to DCPD emergencies. Mr. McWhorter stated the purpose of this policy, which he has been working on for some time, is to have a policy in place in advance on the general principles of how the Committee should respond in the event of an emergency declaration by DCPD. He reported that the Committee reviewed a prior draft at its June public meeting and some revisions have been made since that time and the prior draft was provided for review by members and consultants and by OES Nuclear Power Preparedness Project Manager Ms. Kelly Van Buren. Mr. McWhorter stated the primary disagreement among reviewers now centers upon the provision addressing Committee access to the Emergency Operations Facility (EOF) during an emergency declaration.

Dr. Meshkati stated his primary objection to the current draft is based on the Committee's need to gather sources of information in order to report to the public on the emergency at the next fact finding meeting and he questions how the DCISC can fulfill that responsibility if it is not given access to the EOF. Mr. McWhorter the policy now provides for the DCISC representatives, expected to be a member and a consultant, to report to the PG&E alternate Emergency Operations Center (EOC) at Kendall Road and then to coordinate with PG&E to be allowed access to the EOF, with such access to be determined by PG&E depending on the emergency operations and event conditions existing at the time and he confirmed as written the policy give PG&E the right to deny access based on event conditions. Dr. Scarlat remarked that this seems appropriate as PG&E during an emergency needs autonomy to operate and cannot be distracted or interfered with in its response. Dr. Meshkati remarked that he agrees with PG&E's authority to address the emergency, but the Committee's information gathering in response to an unusual event should be treated akin to its other fact finding visits and there should be no interference and he likened the presence of the Committee in the EOF to that of "a fly on the wall." Dr. Scarlat observed during the accident at Fukushima Daichi there were adverse consequences to safety from having several decision points in an emergency situation and in an emergency the sole decision point should be with the plant owner. In response to Mr. Rathie's observation concerning an apparent conflict between unfettered access by the DCISC to the EOF and PG&E's authority to have unqualified control and authority to respond to the event. Dr. Meshkati agreed that virtual access could be acceptable as he was seeking only an observer role for the Committee.

Dr. Peterson remarked the EOC facilities at Kendall Road have communication capabilities to monitor what is happening at the EOF and the DCISC team can transfer to the Joint Information Center (JIC), which is in proximity to the EOF, but located in a separate room, to prevent disruption of EOF activities. He reported during an emergency the EOF is crowded and each emergency responder present has a designated position and role and he remarked PG&E's concern about the potential to impact the ability of those responders by introducing additional personnel is reasonable. Dr. Peterson remarked California has an emergency response capability in Sacramento which could be a possible venue for the DCISC to observe PG&E's response to an emergency. He reported that the JIC is the venue where press releases are provided and information is monitored and the press does not enter into the other areas of the facility. **He reported Dr. Scarlat and Dr. Meshkati will both have the opportunity to observe an emergency response exercise and the focus of their respective fact finding visits should be on how much information can be obtained and made available to the Committee outside the EOF if in the judgment of PG&E the presence in the EOF of Committee representatives could be disruptive.**

Dr. Meshkati stated there is a difference between PG&E as the plant owner/operator and the operators in the Control Room and he defers to the operators in the Control Room, but if the information obtained by the DCISC during an emergency does not include first-hand observation, and he reiterated his position that PG&E needs to give its permission for access by the DCISC. He stated that he suggested making a change to the draft policy to make access to the EOF a joint PG&E/DCISC decision. Dr. Scarlat disagreed and stated that it would be a mistake and she would not be comfortable with including a joint decision process in an emergency situation. Dr. Meshkati stated his suggestion for a joint decision was only for entering the EOF and the appropriateness of the DCISC's presence in the EOF should not be a decision made unilaterally by PG&E, it should be made jointly and he recognized PG&E's authority to respond to the emergency situation. PG&E Director Tom Jones stated that PG&E would not agree to Dr. Meshkati's suggestion regarding a joint decision on access to the EOF and PG&E will not agree to a blanket statement that EOF access is to be allowed permissively at all times.

Dr. Peterson stated there is value for the Committee Members to table further consideration of the draft policy until all members have had the opportunity to observe an emergency response exercise. He remarked there is a real need to control how information is issued during an emergency as incorrect information could cause real harm in terms of how the public responds and a lot of training goes into this effort and the DCISC should not do anything that could potential interfere with or disrupt the actual emergency response efforts. Dr. Peterson stated he is aware there are video links between the Plant and the EOF and there are likely video links out to the EOC and Kendall Road facilities and he stated the DCISC should investigate what information it would be able to access from Kendall Road. Dr. Meshkati stated in light of the discussion he was not ready to approve the policy and supported tabling the matter until after his fact finding visit to the EOC.

Mr. Jones commented he believes the DCISC should consider working with the State of California Governor's Office of Emergency Services (Cal OES) on the policy and Dr. Peterson agreed that additional investigation would is warranted. Dr. Scarlat observed that in principle information gathering will only be effective when the DCISC works together

with PG&E and the planning for the policy should be directed toward achieving that end. Mr. Jones remarked the next emergency drill will not include participation from the Kendal Road facilities so there will need to be added time during the fact finding to accommodate a visit to Kendall Road which is located approximately 25 miles from the Plant. Dr. Peterson stated the usual practice in observing an emergency exercise is to begin the observation at the Simulator facility, but in this case perhaps the Kendall Road visit might demonstrate the capabilities and the types of data and information that can be accessed there from the EOC.

Dr. Gene Nelson of GCNP was recognized. Dr. Nelson commented he has participated in past emergency exercises and they are complicated exercises and he stated the flow of information is very important. He commended the Committee for planning ahead for its emergency response and he stated his belief the best course is to avoid being in the way and then eventually after gathering information and reporting to the public.

Dr. Justin Cochran, Senior Nuclear Policy Advisor and Emergency Coordinator for the California Energy Commission (CEC) was recognized. Dr. Cochran stated he would assist in setting up a meeting between the Committee and its technical staff with representatives at Cal OES and its Nuclear Power Preparedness Program to review the issues and he stated the CEC is the co-lead agency on energy and utilities emergency support. He reported during and after an event there are sources for credible information that are independent of the media but there are concerns about confidentiality. He commented that the State Department of Public Health, Radiological Health Branch is also engaged in nuclear preparedness emergency response and there is also a tie-in to federal emergency response agencies. Dr. Meshkati thanked Dr. Cochran for his offer.

Mr. Gino Altamirano was recognized. Mr. Altamirano stated he was a descendant of the indigenous Tilhini people who once occupied the DCPD lands and he stated the true match peoples are against the continued production of nuclear energy at Diablo Canyon and remain concerned about seismic faulting and the risk of tsunamis flooding Diablo Canyon in the past and the similarities between DCPD and Fukushima Daiichi. He remarked it would defeat the purposes of the DCISC not to have access to information in real time. He stated he was glad the Committee was discussing this issue and it is important to create a means to either correct or to be aware of human error and corporate error at the time of an emergency. Dr. Scarlat mentioned that there was discussion earlier concerning that there are no recognized local tribes within the Protective Action Zones and she inquired if there were tribal entities that the public would like to bring to the attention of the DCISC so that they can be part of emergency planning outreach. PG&E Director Mr. Tom Jones responded he is the tribal liaison for DCPD and the Yak Tityu Tityu Yak Tilhini tribe are the indigenous peoples most directly related to the village sites that are on the Diablo Canyon lands and they have been regularly engaged in planning and their representatives also serve on the Diablo Canyon Decommissioning Engagement Panel. **Mr. Jones reported there is a bifurcation of tribal recognition between the federal and state governments and the nearest federally recognized tribe are the Santa Ynez Chumash and they are located outside of the Protection Action Zones, but the state has a Native American Heritage Commission which recognizes several tribes that are mostly likely descendants from the village sites in the area. He stated there are several tribes in the area including the Yak Tityu Tityu Yak Tilhini tribe that are in the Protective Action Zones but**

they do not have facilities and live in the general population. Dr. Scarlat stated this is an area where the DCISC should follow up concerning representation and that all necessary connections are being made.

Mr. Rathie then recognized the presence in the audience of DWR Deputy Director Ms. Delphine Hou and he reported that since the decision was made to extend operations at DCPD the Committee has had frequent interactions with Ms. Hou and her colleague Ms. Harpreet Bhalla, Dr. Deb Luchsinger of Preferred Licensing Services, Inc., and Mr. Jerry Bishof, a retired Dominion Energy Senior Vice President working with DWR.

Approval of the DCISC 35th Annual Report on Safety of Diablo Canyon Nuclear Power Plant Operations, July 1, 2024 – June 30, 2025.

Dr. Peterson observed that during the course of this public meeting the Committee members have largely finalized their recommendations for the 35th Annual Report and the members and consultants have all had the opportunity to review the report. Dr. Meshkati recognized the contributions of Mr. Wardell and Mr. McWhorter to the preparation of the report.

On a motion by Dr. Peterson, seconded by Dr. Meshkati, the Committee then approved its 35th Annual Report.

XXXIII RECOGNITION OF DCISC MEMBER'S SERVICE DR. ROBERT J. BUDNITZ

Dr. Peterson stated the final order of business for this public meeting was to extend official recognition and the thanks of the Committee to Dr. Robert J. Budnitz for his 18 years of service on the DCISC. Dr. Budnitz stated it has been a pleasure to have been associated with the Committee and the public during that time. He stated this was also due to the Plant having run very well during his tenure.

Several members of the audience then expressed thanks to Dr. Budnitz. Ms. Hou stated on behalf of DWR her appreciation for all Dr. Budnitz has contributed by working with DWR. She stated that after the passage of SB 846 the DWR was given a formidable legislative mandate and responsibility which it takes very seriously and Dr. Budnitz and the DCISC have been welcoming and helpful in helping with understanding important technical information and she stated she was very appreciative of all his and the Committee's assistance. She stated DWR is better positioned and successful because of Dr. Budnitz and the DCISC and Dr. Budnitz will be missed.

Ms. Linda Seeley spoke on behalf of San Luis Obispo Mothers for Peace and expressed thanks to Dr. Budnitz for helping Mothers for Peace to a better understanding and for responding to its many technical questions. She stated Mothers for Peace feels safer because of Dr. Budnitz' service. She stated she was standing in for Ms. Sherry Lewis, who frequently attends the DCISC public meetings on behalf of Mothers for Peace and Ms. Lewis regretted she was unable to attend today.

Dr. Justin Cochran was recognized. Dr. Cochran expressed his thanks and appreciation to

Dr. Budnitz and stated he has learned much from Dr. Budnitz and complimented him on his communicative skills.

Mr. Gino Altamirano was recognized and stated on behalf of the Tilhini people he thanked Dr. Budnitz for his service and his work to protect the land.

Dr. Gene Nelson on Californians for Green Nuclear Power was recognized and stated he appreciated knowing Dr. Budnitz and appreciated his gentle humor and deep knowledge.

Director Mr. Tom Jones was recognized and stated on behalf of PG&E and everyone at DCPD Dr. Budnitz' tenure on the Committee has helped grow the relationship between the Plant and the Committee and made it much more effective for the both parties and the public. He remarked Dr. Budnitz seismic expertise has greatly assisted in the understanding of the seismic characteristics of the region and to allay a lot of concern. He commented Dr. Budnitz expertise and ability to explain things to members of the public and drive performance by the utility were much appreciated. He thanked Dr. Budnitz for his service.

A Resolution of appreciation, recognition and commendation by the Committee was then read into the record by Consultant Wardell and presented to Dr. Budnitz along with a commemorative gift from his fellow Committee members, the Technical Consultants and Counsel. Dr. Peterson then invited all present to join in an informal reception for Dr. Budnitz service following adjournment of this public meeting. [The expense for the commemorative gift and the reception having been entirely privately funded by the Committee Members, Consultants and Counsels to the Committee.]

XXXIV CONCLUDING REMARKS & DISCUSSION BY COMMITTEE MEMBERS OF FUTURE DCISC ACTIVITIES

- A. Future Actions by the Committee.
- B. Further Information to Obtain/Review.
- C. Confirmation of Future Site Visits, and Public Meetings.

Mr. McWhorter stated there were several dates and personnel changes for fact finding visits made during this public meeting, including changing the January 2026 fact finding meeting from January 13-14 to January 20-21, subject to PG&E's concurrence, and he would be replacing Consultant Wardell for that assignment.

XXXV ADJOURNMENT OF THE ONE HUNDRED AND TWELFTH PUBLIC MEETING

There being no further business, the one hundred and twelfth public meeting of the Diablo Canyon Independent Safety Committee was adjourned by the Chair at 3:36 p.m.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE	
AGENDA TRANSMITTAL FORM	
MEETING DATE:	February 19, 2026
AGENDA ITEM:	XXII-A
AGENDA TITLE:	DCISC Receipt of PG&E's Response to its Thirty-Fifth Annual Report on Safety of Diablo Canyon Operations; July 1, 2024 - June 30, 2025.
CONSENT ☐ ACCEPTANCE ☒ INFORMATION ☐	
The Fourth Restated Charter for the DCISC approved by the California Public Utilities Commission and made effective on October 5, 2025 provides: <i>“The Committee shall prepare an annual report, and such interim reports as it deems appropriate, which reports shall include any findings and recommendations of the Committee for enhanced safety. As required by Public Utilities Code Section 712.1(e)(2) the annual report shall be submitted first to PG&E, and PG&E's response shall be made part of the report which shall then be submitted to the Legislature, the Governor, the CPUC, the CEC, the United States Nuclear Regulatory Commission and to PG&E. The report transmitted to the Legislature shall be in accordance with Section 9795 of the Government Code.”</i> The Committee made fifteen recommendations to PG&E in its Thirty-Fifth Annual Report for the period July 1, 2024– June 30, 2025. PG&E's Response, dated December 18, 2025, was accompanied by a supplemental response.	
RECOMMENDED COMMITTEE ACTION: Motion to accept PG&E's Response as supplemented to the DCISC's Thirty-Fifth Annual Report or take other action as may be appropriate.	



**Pacific Gas and
Electric Company®**

Paula Gerfen
Senior Vice President and
Chief Nuclear Officer

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PG&E Letter DCL-25-096

Dr. Per Peterson
c/o Diablo Canyon Independent Safety Committee
Office of Legal Counsel
SW 4th & Mission, Suite 2, P.O. Box 4523
Carmel, CA 93921-4523

Response to the Diablo Canyon Independent Safety Committee Thirty-Fifth Annual Report
on the Safety of Diablo Canyon Power Plant Operations - July 1, 2024, to June 30, 2025

Dear Dr. Peterson:

On November 07, 2025, Pacific Gas and Electric Company (PG&E) received the Diablo Canyon Independent Safety Committee's (DCISC) Thirty-Fifth Annual Report on the safety of Diablo Canyon operations for the period of July 1, 2024, to June 30, 2025.

The report concludes that PG&E continues to operate Diablo Canyon Power Plant (DCPP) safely and provided 15 recommendations for PG&E. PG&E appreciates the independent review DCISC performed. Responses to the 15 recommendations for PG&E are provided in the Enclosure.

PG&E values the recommendations and the independent review and oversight provided by the DCISC, which contributes to the continued safe operation of DCPP.

As you are aware, safety is always our highest priority, and we will continue to ensure that we fulfill this commitment. We understand we earn the right to operate each day, and we have no greater responsibility than operating, maintaining, and protecting DCPP with excellence on behalf of our customers and hometowns.

Sincerely,

Paula Gerfen
Senior Vice President and Chief Nuclear Officer

December 18, 2025

Date

Enclosure

cc/enc:

Dr. Robert Budnitz
Lisa Darden
Dr. Andrew Kadak
Dr. Mark Kirk
Richard McWhorter, Jr.
Dr. Najmedin Meshkati
Robert Rathie
Dr. Raluca O. Scarlat
R. Ferman Wardell
Robert Wellington

Recommendation No. P11/24FF-3.11:

PG&E should continue to evaluate why a 2018 Root Cause Evaluation for a failed Auxiliary Saltwater Pump motor bearing did not result in sufficiently effective procedure changes. (Section 4.3)

PG&E Response to P11/24FF-3.11:

Pacific Gas and Electric Company (PG&E) reviewed the 2018 Root Cause Evaluation (RCE) and determined that the initial procedure revisions did not fully meet the intent and expectations of the root cause team. Corrective actions identified through this evaluation, including procedure revisions validated by plant personnel, provide assurance that measures are in place to prevent recurrence of accelerated bearing degradation. Additionally, Diablo Canyon Power Plant (DCPP) procedures governing RCEs have been updated to require that any procedure revisions implementing corrective actions are reviewed by the Root Cause Team Lead, ensuring alignment and preventing similar issues in future evaluations.

Details of PG&E's response to this recommendation were discussed with the Diablo Canyon Independent Safety Committee (DCISC) during a September 2025 fact-finding meeting and the fact-finding team concluded that the appropriate corrective actions had been taken, and the DCISC's recommendation to PG&E should be closed.

Recommendation No. P1/25FF-3.3A:

PG&E should review its cause evaluation processes and initiate actions to ensure that deficiencies observed via the Organizational Learning Tool and Safety Culture Assessment are captured and tied to the initiation of appropriate corrective actions. (Section 4.3)

PG&E Response to P1/25FF-3.3A:

In response to this recommendation, DCPP procedures were reviewed to validate the current cause evaluation process ensures deficiencies observed via the Organizational Learning Tool (OLT) and Safety Culture Assessment are captured and integrated into the corrective action development.

In accordance with DCPP procedures, during the cause and corrective action determination phase of a root cause evaluation, the OLT and Safety Culture Assessments are reviewed, and any gaps or deficiencies are incorporated into either corrective or prudent actions. The OLT and Safety Culture sections of the respective RCE reports document whether the corrective actions properly address the OLT and Safety Culture concerns or are created as new actions.

Details of PG&E's response to this recommendation were discussed with DCISC during an August 2025 fact-finding meeting and the fact-finding team concluded PG&E's response was satisfactory and the open item was closed.

Recommendation No. P1/25FF-3.3B:

PG&E should review its cause evaluation processes and initiate actions to ensure that periodic trending is performed across the multiple Organizational Learning Tools and Safety Culture

Assessments that are performed as a part of Cause Evaluations and Root Cause Evaluations.
(Section 4.3)

PG&E Response to P1/25FF-3.3B:

In response to DCISC recommendations, PG&E strengthened its current trending process where the codes were reviewed in aggregate along with lower-level Work Group Evaluation codes by implementing focused trending of cause codes and Safety Culture codes from Cause Evaluations (CEs) and RCEs, with reviews conducted during monthly Continuous Performance Monitoring meetings and Safety Culture Monitoring Panels. In addition, periodic analyses, including six-month reviews of CE cause codes and a five-year historical analysis shared with Performance Improvement leadership, provide comprehensive oversight. These actions are tracked in the Corrective Action Program to ensure accountability and continuous improvement. Collectively, these measures establish recurring, data-driven reviews that enable early trend detection and timely corrective actions.

Details of PG&E's response to this recommendation were discussed with DCISC during an August 2025 fact-finding meeting and the fact-finding team concluded PG&E's response was satisfactory and the open item was closed.

Recommendation No. P12/24FF-3.6:

PG&E should review why an extent of condition review for an unbraced cabinet found by the DCISC in July 2024 did not prevent the identification of a similar condition by the DCISC in December 2024. This recommendation was subsequently completed and closed during this period. (Section 4.20)

PG&E Response to P12/24FF-3.6:

PG&E addressed the DCISC recommendation by revising DCPD standards for bracing office furniture, cabinets, and storage racks to include clear requirements for documenting discrepancies and generating corrective action notifications. A sitewide communication was issued to ensure awareness of the revised policy. A comprehensive inspection of all office furniture, cabinets, and storage racks was performed, with discrepancies documented and corrected; labeling was implemented to identify weighted cabinets not affixed to structural elements. Additionally, a recurring annual inspection order was established to ensure ongoing compliance with the bracing policy. These actions provide a systematic approach to identification, correction, and prevention of similar conditions, ensuring sustained compliance and reducing the likelihood of recurrence.

As noted in your report, these actions were appropriate, are expected to prevent recurrence of similar issues, and this recommendation has been closed.

Recommendation No. P4/25FF-3.6:

PG&E should review if DCPD should have considered developing FLEX guidelines for providing an alternative discharge path for the Auxiliary Saltwater (ASW) System following a Beyond

Design Basis event that may cause a collapse of the Discharge Structure or otherwise obstruct the ASW System discharge. (Section 4.23)

PG&E Response to P4/25FF-3.6:

PG&E reviewed the DCISC recommendation regarding Diverse and Flexible Coping Strategies (FLEX) strategies for an alternative Auxiliary Saltwater (ASW) discharge path following a potential collapse or obstruction of the discharge structure. The DCPD FLEX program adheres to Nuclear Energy Institute (NEI) 12-06, Revision 2, which establishes symptom-based coping strategies to maintain key safety functions under beyond-design-basis conditions. Existing FLEX guidelines already address scenarios involving discharge structure impairment: (1) partial blockage would not affect ASW flow due to its relatively low discharge rate; (2) complete blockage would be mitigated by deploying FLEX heavy equipment for debris removal; and (3) severe damage would be addressed by routing discharge through hoses or flexible couplings to the ocean. These strategies ensure multiple, feasible alternatives for maintaining ASW function, providing sufficient assurance that plant safety can be preserved without additional FLEX guidelines.

Recommendation No. P12/24FF-3.2:

PG&E should further expand their use of electronic procedures-type applications, subject to proper human systems integration, because the improved human performance and documentation of work can directly improve the safety of operations. (Section 4.27)

PG&E Response to P12/24FF-3.2:

PG&E appreciates the Committee's recommendation to expand the use of electronic procedure-type applications to improve human performance and operational safety.

DCPD is actively implementing the NextAxiom Dynamic Work Execution Platform® to achieve these objectives. In December 2024, PG&E purchased the Dynamic Instructions (DI) and Revision Work Flow (RWF) modules, and in December 2025, successfully delivered the first DIs to the test environment. Following sufficient testing and validation, these DIs will transition into the production environment.

In parallel, PG&E is developing an RWF process to enable dynamic procedure revision routing. Together, these implementations will enhance work processes, reduce human error, and eliminate inefficiencies.

DCPD remains strongly committed to this initiative, as demonstrated by our participation in the NextAxiom Users Group Conference, and by engaging team members to benchmark best practices and enhance expertise in dynamic work processes.

Recommendation No. P/SRT-1:

The Committee recommends the development of a set of kinematically constrained structural models for reverse faults underlying the Irish Hills that can explain the folding observed since 5 Ma. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-2:

The Committee recommends dating of low-stand abrasion platforms offshore, south of the Irish Hills, to further constrain the rate of footwall subsidence and its contribution to the Southwest Boundary Zone slip rate. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-3:

The Committee recommends monitoring of IRSL-dating efforts and reassessment, if necessary, of the MIS 5 age assignments for the Q1 and Q2 terraces surrounding the Irish Hills. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-4:

The Committee recommends further investigation of potential strike-slip faulting along the Los Osos trend and its impacts on the pattern of marine-terrace uplift. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-5:

The Committee recommends that PG&E should follow up the SRT's preliminary work with a more complete study of the available GPS data. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-6:

The Committee recommends that the fault slip models that underlie the DCPD Seismic Source Characterization should be developed into kinematic and mechanical models that can predict the interseismic deformation and can thus be directly tested against the GPS data. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-7:

The Committee recommends that PG&E should compute the relative contributions of strike-slip and reverse faulting to the regional deformation predicted by the SSC24 (Seismic Source Characterization 2024) slip models and compare the values with the geodetic constraints. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-8:

The Committee recommends Geologic slip-rate information should be acquired from the Rinconada and Huasna faults to permit better modeling of the shear component evident in the GPS data. (Exhibit D.12, Section 3.0)

Recommendation No. P/SRT-9:

The Committee recommends that PG&E should conduct modeling experiments to ascertain the sensitivity of DCPH hazard to the SSC modifications recommended by the SRT. (Exhibit D.12, Section 3.0)

PG&E Response to No. P/SRT-1 through 9:

PG&E will evaluate the Seismic Review Team (SRT) recommendations to identify items that are not covered by the Long-Term Seismic Program (LTSP), are technically defensible, and are likely to yield meaningful results. For qualifying topics, sensitivity studies and assessments will be conducted in 2026 to determine potential impacts on seismic hazard characterization. Findings will guide research prioritization and be reviewed by the DCISC SRT and provided to the Independent Peer Review Panel. This approach was discussed with the DCISC in September and October 2025 and ensures systematic integration of significant seismic hazard characterization insights into LTSP planning.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**AGENDA TRANSMITTAL FORM****MEETING DATE:** February 19, 2026**AGENDA ITEM:** XXII - G

AGENDA TITLE: Discussion of Administrative and Regulatory Matters Including Funding Matters, Consideration of New Committee Policies on Committee Response to Diablo Canyon Power Plant Emergencies and a Process Map for Committee Recommendations, Concerns, Conclusions and Observations. Consider Ratification of Agreements for Consulting Services with Mr. Richard St. Onge and Dr. G. Kenneth Koves.

CONSENT [☐]**ACTION** [☒]**INFORMATION** [☒]**Staff Summary:**

It is anticipated the Members, Technical Consultants and Legal Counsel will hold a discussion and receive information concerning administrative, regulatory and financials matters.

The Committee is also expected to consider Committee Policies including (i) Committee Response to Diablo Canyon Emergencies, and (ii) a Process Map for Committee Recommendations, Concerns, Conclusions and Observations.

Member are also expected to consider ratification of Agreements for Consulting Services with Mr. Richard St. Onge and Dr. G. Kenneth Koves.

RECOMMENDED COMMITTEE ACTION:

Discussion and take such action, by motion or otherwise, and/or provide direction as appropriate.

RESPONSE TO DIABLO CANYON POWER PLANT EMERGENCIES

Yellow highlights = EOF Access Statement Still Under Discussion & task to meet with State OES remains outstanding.

1. Committee Emergency Response Purpose

Inherent with the use of nuclear power is the very small likelihood of an emergency which may directly affect members of the general public. When an emergency occurs at Diablo Canyon Power Plant (DCPP), the plant staff are expected to follow DCPP's pre-approved Emergency Plan and make a prompt declaration of an emergency to governing entities. The purpose of this document is to provide a plan of action for the DCISC ("Committee") members and staff to ensure the Committee has access to a timely and continuing flow of accurate information regarding the emergency and PG&E's response to the declaration of an emergency at DCPP. Should an emergency be declared by DCPP, it is desired for the Committee to have an advance plan for:

- A) Being promptly informed by Pacific Gas and Electric (PG&E) of any emergency declaration under DCPP's Emergency Plan,
- B) Responding in accordance with its constitutive charter to "review Diablo Canyon Nuclear Power Plant operations for the purpose of assessing the safety of operations" while recognizing that the Committee serves as a State of California advisory body and has no role or authority as a participant under DCPP's Emergency Plan,
- C) Delineating its role and responsibilities in responding to inquiries from state and local agencies, and
- D) Referring inquiries from the public to the pre-determined sources of public information available under DCPP's Emergency Plan.

2. Committee Emergency Response Goals

The goals of the Committee's response include:

- A) Obtain a timely understanding of the nature of the emergency,

- B) Establish a relationship and regular flow of information and communications with PG&E necessary to monitor the emergency event and PG&E's implementation of its Emergency Plan,
- C) Gather information about the event and independently evaluate its significance and PG&E's management of the event using means and methods similar to the Committee's typical Fact-Finding Meetings in anticipation of reporting on and reviewing the event at the Committee's next Public Meeting, and
- D) When requested, gather any additional information necessary to provide advice or otherwise assist its appointing entities, state and local agencies [such as the Governor's Office of Emergency Services (Cal OES), the County of San Luis Obispo Office of Emergency Services (SLO County)], or PG&E.

3. Committee Emergency Response Guiding Principles

The Committee's response shall be guided by the following principles:

- A) When responding to an emergency at DCP, the Committee will always conduct its activities in compliance with the Committee's charter and DCP's Emergency Plan.
- B) When responding to an emergency at DCP, the Committee will always conduct its activities in a manner that does not interfere with PG&E's or offsite authorities' responses to the emergency.
- C) When responding to an emergency at DCP and for the time period that emergency response activities are actively in progress, any information provided by PG&E with the advice that it is not otherwise in the public domain will be treated and considered as confidential information and will not be distributed to the general public by the DCISC.
- D) When responding to an emergency at DCP, the Committee will not make any recommendations (as that term is used in the Committee's Charter) to PG&E during the event. Any potential recommendations that arise during the Committee's response activities will first be documented in a Fact-Finding Report and then presented for discussion and approval by the full Committee at a Public Meeting. As discussed in 2.D herein, Committee Members or staff may provide advice or other assistance if requested to do so.
- E) When responding to an inquiry from state or local agencies, while cognizant of its independence the Committee will strive to avoid bypassing the relationships between PG&E and the agencies that have been designated in the Emergency Plan.

- F) When responding to an inquiry from the public, the Committee may provide responses to the public that include and explain the nature and classification of the event and the Committee's monitoring role in response; however, the Committee will strive to refer inquiries for information to the Joint Information Center (JIC) as designated in the Emergency Plan to handle public communications.

4. Emergency Significance and Classifications

In the event of an off-normal condition at DCP, the plant's Emergency Plan will be used to analyze the significance of the event and classify it according to pre-established guidelines approved by the Nuclear Regulatory Commission. Under the Emergency Plan, the four classifications for declared emergencies (in increasing severity) are:

- A) Unusual Event (UE),
- B) Alert,
- C) Site Area Emergency (SAE), and
- D) General Emergency.

In general, only the highest two classifications (SAE and General Emergency) are expected to involve a possible release of radioactive material offsite. Additional details about the four classifications of declared emergencies under the Emergency Plan are contained in Enclosure 1.

5. Actions for PG&E

In the event of a declaration of an emergency at DCP under any one of the four classifications in the Emergency Plan, PG&E has agreed to take the following actions to support the DCISC in its response to the event:

- A) PG&E will promptly notify the Committee of any event declaration.
- B) PG&E will provide a point of contact, the "Designated Liaison," for coordinating the flow of timely event-related information to the Committee (typically the PG&E employee normally assigned to coordinate the DCISC's activities).
- C) If the Committee desires to send a member and/or staff to the vicinity of DCP to facilitate its gathering of information, PG&E will facilitate providing the Committee's representatives with access to the site and/or emergency response facilities as discussed in Section 3A through 3D herein. Unless otherwise directed by PG&E, it is expected that

the Committee's representatives will first report to the Alternative Operations Support Center/Technical Support Center, located at 1250 Kendall Road, in San Luis Obispo, to be used as a staging area for the Committee's activities. From that staging area, the Designated Liaison should facilitate further access and information gathering by the Committee's representatives to the Joint Information Center. Further access to the Emergency Operations Facility or plant site by the Committee's representatives will be assessed and determined by PG&E depending on emergency operations and event conditions. Vests identifying the wearer as a representative of the DCISC should be provided and worn when in emergency response facilities.

The methods and details of the above actions will be discussed and agreed upon in advance between PG&E and the Committee and may change from time to time. Such plans should be revisited annually at the first Committee fact finding conducted by the Committee Chair during the calendar year to verify that both parties continue to be in agreement, and any changes should be reviewed and approved as a part of a Fact-Finding report by the Committee at its next Public Meeting.

6. Actions for the Committee for an Unusual Event

In the event of the declaration of an Unusual Event (UE) as classified under the Emergency Plan, the Committee should respond as follows:

- A) Any Committee member or staff receiving notification of a UE from PG&E will immediately pass on such notification to all other Committee members and staff.
- B) The Committee Chair will be the lead member in coordinating the Committee's response.
- C) The Committee will request that PG&E identify its Designated Liaison to the Committee and request that the Designated Liaison provide the Committee with current information and updates relative to the cause of the UE, actions taken by PG&E, and responses to any Committee questions.
- D) The Committee will provide PG&E with the Committee's designated point of contact for requesting and receiving communications about the UE to and from PG&E. The Committee should strive to channel all communications and questions regarding the UE through the Committee's designated point of contact and PG&E's Designated Liaison.
- E) The Committee members and staff should communicate internally to independently review and analyze the information provided by PG&E to assess the safety significance of the UE and the appropriateness of the actions taken by PG&E.

- F) The information gathered and the Committee's review of the UE should be treated like any information gathered during a Fact-Finding Meeting and documented in a subsequent Fact-Finding Report and discussed at the Committee's next Public Meeting.
- G) If a DCISC Public Meeting is scheduled during a time overlapping with or immediately following the declaration of a UE at DCP, the Committee should consider suspending or cancelling and rescheduling that Public Meeting to a more appropriate time following the completion of emergency response activities.

7. Actions for the Committee for an Alert, SAE, or General Emergency

In the event of the declaration of an Alert, SAE or General Emergency as classified under the Emergency Plan, the Committee should respond as follows:

- A) Any Committee member or staff receiving notification of an Alert, SAE, or General Emergency from PG&E will immediately pass on such notification to all other Committee members and staff.
- B) The Committee Chair will be the lead member in coordinating the Committee's response.
- C) The Committee will request that PG&E identify its Designated Liaison to the Committee and request that the Designated Liaison provide the Committee with current information relative to the cause of the event, actions taken by PG&E, and responses to any Committee questions.
- D) The Committee will provide PG&E with the Committee's designated point of contact for requesting and receiving communications about the event to and from PG&E. The Committee should strive to channel all communications and questions regarding the event through the Committee's designated point of contact and PG&E's Designated Liaison.
- E) The Committee members and staff should initially enter a monitoring posture without any Committee members or staff responding directly to the area.
- F) The Committee members and staff should communicate internally to independently review and analyze the information provided by PG&E to assess the safety significance of the event and the appropriateness of the actions taken by PG&E.
- G) Information gathered and the Committee's review of the event should be documented in a subsequent Fact-Finding Report and discussed at the Committee's next Public Meeting. As is typical for Fact-Finding Reports, any information declared by PG&E to be confidential will be protected from public disclosure; however, the information contained

therein may be reviewed by the Committee and used to develop its conclusions relative to operational safety.

- H) If a DCISC Public Meeting is scheduled during a time overlapping with or immediately following the declaration of an emergency at DCP, the Committee should suspend or cancel and reschedule that Public Meeting to a more appropriate time following the completion of emergency response activities.
- I) The Committee should take any necessary actions to prepare for and respond to any requests from its appointing entities or other state or local entities regarding providing technical assistance in evaluating the safety significance of the event and actions taken under DCP's Emergency Plan subject to the discussion in 3.D herein.
- J) The Committee should consider drafting and providing a press release or distributing a statement to members of the public on its website (www.dcisc.org) regarding its monitoring role and referring members of the public to other websites where the public can gain additional information (as coordinated with PG&E's Designated Liaison). In any press release or statement to the public the Committee will adhere, to the extent practicable, to the discussion in Section 3.F herein.
- K) The Committee Chair may consider appointing a Special Fact-Finding Team, consisting of one member and one or two consultants (no more than three individuals), to respond to the area near DCP in order to independently and in-person gather information about the cause of the event, actions taken in response to the event, and interactions between PG&E and federal, state and local agencies. Typically, this decision would consider whether the event could be reviewed as a part of the Committee's next regularly scheduled Fact-Finding Meeting or whether the event warranted that a Special Fact-Finding Meeting should be initiated. It should be understood and expected that the process of designating a Special Fact-Finding Team and having them respond to the local area would likely require a minimum of one to three days before the team would be able to arrive in the area to begin its work, by which time the event and emergency response activities may be completed. Any Special Fact-Finding Team responding to an event should plan to begin its work at the staging area discussed in 5.C herein and facilitate its gathering of information subject to the discussion in Section 3.A through 3.D herein.
- L) If so appointed, a Special Fact-Finding Team should assume the responsibilities as the central point of contact for the Committee with PG&E's Designated Liaison, and the Special Fact-Finding Team should provide regular updates to other Committee members and staff.

- M) If so appointed, a Special Fact-Finding Team should coordinate all of the Committee's activities with regards to inquiries from state or local agencies and the public under Sections 7.I and 7.J herein.
- N) If so appointed, a Special Fact-Finding Team should document all non-confidential information gathered in a Special Fact-Finding Report to be discussed and approved at the Committee's next Public Meeting. Any information declared by PG&E to be confidential will be protected from public disclosure; however, the information contained therein may be reviewed by the Special Fact-Finding Team and used to develop its conclusions relative to operational safety.
- O) The Committee should consider additional follow-up to review any event's causes and corrective actions at additional special or regularly scheduled Fact-Finding Meetings with subsequent follow-up in Fact-Finding Reports to be discussed at future Public Meetings of the Committee.

Enclosure 1

Classifications of Emergency Events (from www.nrc.gov)

A. Unusual Event (UE) – A situation which could potentially degrade the plant's level of safety or indicate a security threat to the facility. No releases of radioactive material requiring offsite actions are expected unless safety systems degrade further. This classification ensures the first steps for future response are being carried out, that operations staff are ready, and that the plant systematically handles unusual event information and decision-making.

B. Alert – Events are in progress or have occurred which have (or could) substantially degrade the plant safety, or a security event that could threaten site personnel or damage to site equipment. Any offsite releases of radioactive material that could occur are expected to be minimal. This classification ensures that emergency personnel are ready and available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required. It also ensures that offsite authorities receive current information on plant status.

C. Site Area Emergency (SAE) – Events which have caused (or likely will cause) major failures of plant functions that protect the public or involve security events with intentional damage or malicious acts that could lead to the likely failure of (or prevent effective access to) equipment needed to protect the public. Any offsite releases of radioactive material are expected to remain below public exposure guideline levels beyond the site boundary. An SAE declaration ensures: a) emergency response centers are staffed; b) monitoring teams are dispatched; c) personnel required for evacuating nearby areas are at duty stations if the situation becomes more serious; d) proper consultation with offsite authorities; and e) government authorities are providing updates to the public.

D. General Emergency - Events which: a) have caused (or shortly will cause) substantial reactor core damage, with the potential for uncontrolled releases of radioactive material, or b) involve security events that deny plant staff physical control of the facility. Offsite releases can be reasonably expected to exceed public exposure guideline levels beyond the site boundary. A General Emergency declaration initiates protective actions for the public including: a) on-going dose projections by the licensee and offsite organizations; b) additional protective measures as necessitated by potential or actual releases; c) consultation with offsite authorities; and d) updates to the public by government authorities.

PROCESS MAP

RECOMMENDATIONS, CONCERNS, CONCLUSIONS & OBSERVATIONS

The Definitions:

“Recommendation to PG&E” means an action to improve the safety of operation of the Diablo Canyon Power Plant concerning which PG&E should take the action described. Each Recommendation to PG&E is documented and designated in Fact Finding Reports, Annual Reports, and the Open Items List by the letter “P” together with a reference with the fact finding meeting date and the section of the Fact Finding Report or the date of the public meeting when the Recommendation to PG&E was initiated. During the reporting period the status of each Recommendation to PG&E will be reviewed at each public meeting in context of review of the Open Items List and, at the conclusion of the reporting period, the Annual Report. PG&E will respond to each Annual Report.

“Recommendation to the DCISC” means an internal commitment to review, follow-up, or take other action. Each Recommendation to the DCISC is documented and designated by the letter “D” together with a reference with the fact finding meeting date and section of the Fact Finding Report or the date of the public meeting when the Recommendation to the DCISC was initiated. The status of each Recommendation to the DCISC will be reviewed at each public meeting in context of review of the Open Items List. The creation of Recommendations to the DCISC that are duplicative of items already listed and tracked as a part of the Open Items List should be avoided.

“Concern” means a question or issue during the reporting period which is shared by PG&E and does not result in a Recommendation to PG&E. Concerns are documented in the Open Items List and in the Annual Report.

“Significant Conclusion” means a matter reviewed in depth during the annual reporting period. Significant Conclusions are documented in the Annual Report.

“Specific Conclusion” means a conclusion drawn from review of each topical area reviewed during a Fact-Finding Meeting in the reporting period. Specific Conclusions are documented in the Annual Report.

“Observation” means a matter that while not necessarily related to a major issue is included in a Fact Finding Report and designated for possible action. Observations for which action should be taken during the reporting period are documented in the Open Items List.

The Process:

1. A Member conducting a fact finding meeting shall determine, and the Fact Finding Report will include: (i) any updates appropriate for existing items on the Open Items List, (ii) any new Recommendation to PG&E and any new Recommendation to the DCISC; (iii) any Recommendation to PG&E or Recommendation to the DCISC recommended by the Member for closure or for further disposition and (iv) any Concern or Observation identified or previously identified now requiring further disposition.
2. A Recommendation to PG&E, Recommendation to the DCISC, or Concern which has, in the judgment of a Member conducting a subsequent fact finding, been adequately addressed by PG&E shall be described and so designated in **bold text** in the Fact Finding Report as “Recommended for Closure.”
3. Fact Finding Reports will include whether the subject of a Recommendation to PG&E or a Concern resulted in initiation of a Notification by PG&E.
4. Fact Finding Reports will be circulated in accordance with Committee Policy No. 8 [Review of Fact Finding Reports].
5. Upon approval of a Fact Finding Report, any new Recommendation to PG&E, Recommendation to the DCISC, Concern, or Observation for which action should be taken during the reporting period will be documented in the next Open Items List.
6. Draft Fact Finding Reports to be considered at each public meeting will be posted to the website prior to the meeting.
7. A public presentation will be made for each Fact Finding Report and public comment received at each public meeting and, upon approval the Fact Finding Report will be provided to PG&E.
8. All Recommendations to PG&E, Concerns, Significant Conclusions and Specific Conclusions during the reporting period, whether open or closed, will be included in the Annual Report.
9. A Recommendation to PG&E or a Concern may be amended prior to inclusion in an Annual Report.
10. Disposition of all Recommendations to PG&E, whether open or closed, during the reporting period will be addressed in context of the receipt of the PG&E’s response to the Annual Report.

AGREEMENT FOR CONSULTING SERVICES

THIS AGREEMENT is made and entered into on December 11, 2025, between the DIABLO CANYON INDEPENDENT SAFETY COMMITTEE (hereinafter referred to as the "Committee") and Richard St. Onge ("Consultant"), as follows:

Recitals

A. In December 1988 the California Public Commission ("CPUC") approved and adopted a settlement agreement between Pacific Gas & Electric Company ("PG&E"), the Division of Ratepayer Advocates of the CPUC, and the Attorney General of the State of California relating to Diablo Canyon Nuclear Power Plant ("DCPP"). California Public Utilities Code Section 712.1, as amended, recognizes the establishment of the Committee by the CPUC to make recommendations appropriate to enhance the safety of the operation of DCPP. The Committee was established and chartered as a three-member California state advisory body to review PG&E's adherence to safety standards at DCPP, conduct site visits, review DCPP operations, and prepare reports and suggest any recommendations for safe operations. In Decisions D.88-12-083, D.97-05-088, D.04-05-055, D.07-01-028 D.23-08-004, and D. 25-06-002 the CPUC has provided for the continuing operation of the Committee in order that it might fulfill its responsibilities.

B. California Public Utilities Code Section 712.1 and the Restated Charter for the DCISC provide for the extension of the Committee's oversight role on nuclear safety matters to continue following DCPP's cessation of electricity generating operations and for the Committee to review nuclear fuel-related issues and to terminate that review upon completion of the safe transfer from the DCPP spent fuel pools of all nuclear fuel to the Independent Spent Fuel Storage Installation (ISFSI).

C. DCPP was initially licensed by the NRC to operate until November 2, 2024 (Unit 1) and August 26, 2025 (Unit 2). Pursuant to California Senate Bill 846 the CPUC directed and authorized PG&E to take all actions to continue to operate the powerplant beyond the current license expiration dates so as to preserve the option of extended operations until October 31, 2029 for Unit 1 and October 31, 2030 for Unit 2, conditioned on continued authorization from the NRC.

D. On November 7, 2023, PG&E submitted an Operating License Renewal Application to the NRC for Diablo Canyon Unit 1 and Unit 2 to extend their current operating licenses for an additional 20 years, that is, until November 2, 2044 (Unit 1) and August 26, 2045 (Unit 2). On December 19, 2023, the NRC determined the Operating License Renewal Application to be complete, permitting under an exemption to NRC regulation the current Operating Licenses to remain in effect until the NRC's review of the Operating License Renewal Application is complete.

E. The Committee's Charter provides for the Committee to contract for services, including the services of consultants and experts, to assist the Committee in its safety review.

F. The Committee now requires and wishes to engage the Consultant to work collaboratively with other Committee consultants and the Committee members on the performance of the above referenced review and reporting activities, which services are described in **Exhibit "A"** (the "Scope of Services") hereto.

G. At their October 22-23, 2025, public meeting the Committee Members unanimously approved the Scope of Services and authorized the execution by the Committee Chair of this Agreement for Consulting Services.

H. Consultant is qualified to perform and wishes to provide those services requested by the Committee.

I. The Committee wishes to engage the services of Consultant and Consultant consents to provide such services, upon the terms and conditions hereinafter set forth.

Terms and Conditions

In consideration of the mutual promises contained herein, the Committee and Consultant hereby agree to the following terms and conditions:

1. Scope of Services. Consultant shall provide to the Committee those services set forth in the Scope of Services, which is attached as **Exhibit "A"** to this Agreement. Such services may be modified, from time to time, as required, by a written amendment to **Exhibit "A"** which shall be signed by the Consultant and the Committee Chair.

2. Compensation. For the services to be provided by Consultant under this Agreement, Consultant shall be compensated from the time Consultant began providing services at the hourly rate of \$240.00 per hour. Time spent by Consultant for the services hereunder shall be recorded under generally accepted accounting practices and shall be itemized on any billings to the Committee. In addition to compensation for the Consultant's time above, the Committee shall also reimburse Consultant directly for all out-of-pocket expenses reasonably incurred by Consultant in connection with providing services to the Committee including, but not necessarily limited to, printing of any reports, photocopies, facsimile, postage, long-distance telephone and internet charges and for any travel specifically requested by the Committee and for lodging and subsistence (meals and incidental expenses) incurred during such travel. Time and expense reporting shall be in accordance with Committee Policy No. 6 "Consultant Guidelines" attached hereto as **Exhibit "B"** hereto. This Agreement is for Consultant to perform "on-call" services or tasks and as such it is a standby agreement to assign work to the Consultant from time-to-time as needed and as appropriate. There is no minimum or maximum (i.e., "not to exceed") amount of compensation for this engagement or for any work assigned pursuant to this Agreement.

3. Ownership of Work Product. Ownership of any reports, data, studies, surveys, charts, maps, figures, photographs, memoranda and any other documents which are developed, compiled or produced pursuant to this Agreement, whether or not completed, shall be vested in the Committee. If the Consultant's working papers or deliverables include computer generated

statistical material, the Consultant shall provide the material to the Committee in a mutually agreed upon computer-readable format and media. Any evaluation, assessment or report by Consultant shall be made in accordance with the Consultant Guidelines, **Exhibit "B"** hereto.

4. Delegation of Work. Consultant's professional qualifications and experience constitute a principal consideration for the Committee in entering into this Agreement, therefore Consultant may not delegate the services to be performed by Consultant or utilize any sub-consultant, person or firm having applicable expertise to assist Consultant in performing the work authorized by this Agreement without the prior written consent of the Committee Chair which may be withheld in the Chair's sole discretion.

5. Independent Contractor. The parties agree that Consultant, any sub-consultants and agents shall be independent contractors with regard to the providing of services under this Agreement, and that Consultant and its employees, sub-consultants or agents shall not be considered to be employees or agents of the Committee for any purpose. The Committee shall make no deductions for payroll taxes or Social Security from amounts due Consultant for services provided under this Agreement.

6. Conflict of Interest. Consultant covenants that he does not have and shall not acquire any interest directly or indirectly which would conflict in any manner with the interests of the Committee or which would in any way hinder or affect Consultant's performance of services under this Agreement. The Committee understands and acknowledges that Consultant may have in the past and may be as of commencement of services under this Agreement performing services unrelated to the engagement described herein.

7. Liability Insurance. Consultant shall, at his sole cost and expense, at all times during which services are performed under this Agreement, maintain in force automobile liability insurance covering all vehicles used during such performance of services. Such insurance policy or policies shall be maintained on the minimum basis of \$100,000.00 for damage to property and \$500,000.00 for bodily injury or death in any one accident.

8. Indemnification. The Committee agrees to indemnify and hold the Consultant harmless from any liability, loss, or damage Consultant may suffer as a result of claims, demands, costs, or judgments arising out of the activities by Consultant to be carried out pursuant to the obligations of this Agreement, including, but not limited to, the use by the Committee of the results obtained from the activities performed by Consultant under this Agreement, except and to the extent any such liability, loss, or damage result from the negligence or willful malfeasance of the Consultant.

9. Workers' Compensation Insurance. Consultant shall, at its sole cost and expense, at all times during the performance of services under this Agreement, maintain in force and effect workers' compensation insurance on any employee of Consultant working pursuant to this Agreement in an amount not less than the California statutory required minimum.

10. Compliance with Laws. Consultant and any employees and agents shall comply with all applicable state, federal and local laws and safety regulations while performing services pursuant to this Agreement.

11. Confidential Information. In the course of performing this Agreement, the Consultant may receive confidential information. Federal law restricts disclosure of certain information; accordingly, Consultant shall seek approval of the Committee's Legal Counsel for access to such information and shall comply with all laws, regulations and policies, including the Committee's Restated Charter and the Policies of the Committee applicable to access to, possession and use of such information. The Committee is subject to the California Public Records Act (Government Code Section 7920.000 et seq.). Consultant and all persons who receive confidential information in the course of or as a result of the performance of this Agreement shall have a duty to maintain the confidentiality of information so designated. No disclosure of confidential information shall be made to any person who does not have a need to receive the information in order to assist in the performance of this Agreement and any person receiving such disclosure shall be required to execute a written Agreement requiring the recipient to comply with the provisions of this Section 11.

12. Termination or Suspension. The Committee may terminate or suspend this Agreement at any time and for any reason. Should the Committee elect to terminate or suspend this Agreement, it shall be obligated to Consultant for any charges for services rendered by Consultant and properly substantiated by Consultant up to the date of termination or suspension.

Consultant may terminate this Agreement upon giving Committee thirty (30) days' written notice in advance thereof. Should Consultant elect to terminate this Agreement, Consultant shall give Committee all data, memoranda, reports, and other documents prepared in performance of this Agreement.

13. Assignment. This Agreement may not be assigned or otherwise transferred by Consultant without the prior written consent of the Committee.

14. Draft Documents Confidential. Consultant agrees that until final approval by the Committee all data, memoranda, reports and other documents are confidential drafts and will not be released to third parties without the prior written consent of the Committee Chair.

15. Notice. Unless otherwise mutually agreed upon in writing by the parties, all notifications, notices, demands, requests and other communications herein provided for or made pursuant hereto shall be in writing and shall be sent by (i) registered or certified mail, return receipt requested, and the giving of such communication shall be deemed complete on the third (3rd) Business Day after the same is deposited in a United States Post Office with postage charges prepaid, or (ii) reputable overnight delivery service, and the giving of such communication shall be deemed complete on the immediately succeeding Business Day after the same is deposited with such delivery service.

If to Consultant, addressed to the address set forth below, or at such other address in the continental United States as Consultant may furnish to the Committee in writing:

Mr. Richard St. Onge

31422242 Union

San Juan Capistrano, CA 92675

Mobile: (714) 385-8139

Stonger369@gmail.com

If to the Committee, addressed to the Committee, at the address set forth below, or at such other address in the continental United States as the Committee may furnish to Consultant in writing:

Diablo Canyon Independent Safety Committee
c/o Office of the Legal Counsel
P.O. Box 4523,
Carmel-by-the-Sea, CA 93921-4523
Telephone: (831) 647-1044; (800) 439-4688 (In CA only).
info@disc.org

16. Attorney's Fees. In the event of any controversy, claim or dispute relating to this Agreement, or the breach thereof, the prevailing party shall be entitled to recover from the other party reasonable expenses, attorney's fees and costs.

17. Amendment or Modification/Captions. This Agreement is not subject to amendment, change or modification except by a writing signed by Consultant and the authorized representative of the Committee. The captions of the various sections are for convenience and ease of reference only, and do not define, limit, augment or describe the scope, content or intent of this Agreement.

18. Counterparts. This Agreement may be executed in two counterparts, each of which shall be deemed an original but both of which shall constitute one and the same instrument. Delivery of an executed counterpart with a party's signature by electronic imaging (pdf) shall be effective as delivery of a manually executed counterpart.

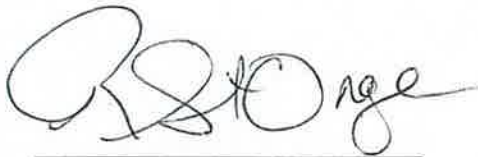
19. Effective Date. This Agreement is effective on the date first written above and shall continue unless terminated earlier as provided herein.

DIABLO CANYON INDEPENDENT
SAFETY COMMITTEE

RICHARD ST. ONGE

By 

Per F. Peterson, Chair
Date: November 25, 2025



Richard St. Onge
Date: December __, 2025

EXHIBIT "A"

SCOPE OF SERVICES

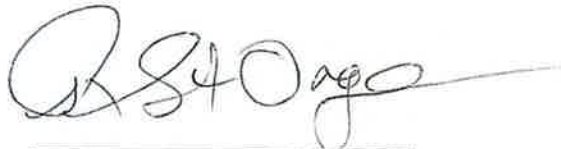
1. Participation in technical and programmatic reviews of the safety of Diablo Canyon Power Plant nuclear operations regarding matters in connection with plant decommissioning and spent nuclear fuel storage, in certain DCISC public meetings, and in the development of DCISC fact-finding reports and Annual Reports concerning matters in which the Consultant participated. Provide support to the Committee as requested by Committee members. These tasks include, but are not limited to: reviewing Committee, PG&E, and documents from other sources as the basis for recommending potential issues or concerns that the Committee may wish to pursue; participating in certain Committee fact-finding visits and tours of Diablo Canyon Power Plant; helping to identify additional supporting specialists and developing background material on specific issues; and reviewing, preparing and presenting reports and public presentations concerning these activities.
2. Attendance in person the September 1-2, 2026 fact-finding visit and Emergency Planning NRC-evaluated exercise to be held during the visit and participate in preparation of the report on that visit.
3. Attendance in person at the October 20-21, 2026, Public Meeting.

DIABLO CANYON INDEPENDENT
SAFETY COMMITTEE



By _____
Per F. Peterson

CONSULTANT



Richard St. Onge

EXHIBIT B

Diablo Canyon ISC
Committee Policy No. 6

CONSULTANT GUIDELINES

The Diablo Canyon Independent Safety Committee (DCISC) may contract with consultants to perform various tasks in its review of the safety of operations of the Diablo Canyon Power Plant. The following are guidelines for consultant agreements and activities:

1) Prior to charges being made for services rendered, a consultant shall sign a written agreement that has been signed by the Chair or a designated DCISC member and approved by the affirmative vote of at least two-thirds of the members of the DCISC. A proposed standard form of Agreement is attached hereto.

2) Consultant work shall not commence without a specific scope of services description which shall be signed by the Chair or a designated DCISC member and approved by the affirmative vote of at least two-thirds of the members of the DCISC or attached as part of the signed agreement referred to in paragraph 1. A sample specific scope of services is attached.

3) The signed original of the Agreement and Specific Scope of Services shall be sent by the Chair or designated DCISC Member to the DCISC Legal Counsel for retention, with copies to the other DCISC members and the contracting consultant.

4) Any consultant recommendations in reports shall be made as recommendations to the DCISC which will review and decide on disposition. Consultant reports shall be marked and considered as drafts until approved by the affirmative vote of at least two-thirds of the members of the DCISC. The Chair or designated DCISC member shall review and approve for presentation draft reports prior to the Consultant's presentation at a DCISC public meeting.

Copies of draft reports shall be distributed to all DCISC members and the DCISC Legal Counsel prior to the Consultant's report at a public meeting and subsequent final approval by the affirmative vote of at least two-thirds of the members of the DCISC.

5) Consultant charges for travel expenses shall be for actual expenditures with receipts for charges of \$25.00 or more and for all lodging. The attached form is to be used for submittal for reimbursements.

6) Time reporting shall be as follows:

- a) Report time to nearest 0.25 hours.
- b) A "standard day" is defined as the normal eight-hour working day.
- c) All DCISC actual work-time and travel-time during the "standard day" is charged.
- d) All time on-assignment or on-location during the "standard day" is charged.
- e) DCISC actual work-time outside the "standard day" is charged at standard rates.
- f) DCISC travel-time outside the "standard day" is not charged unless it includes DCISC work.

7) Contracts entered into with consultants or experts for a particular project shall include an estimated total cost for such work, which amount shall not be exceeded without prior authorization by the Committee Chair and ratification by the affirmative vote of at least two-thirds of the members at a regular Committee meeting.

[Adopted June 1994; Revised October 2003]

AGREEMENT FOR CONSULTING SERVICES

THIS AGREEMENT is made and entered into on December 28, 2025, between the DIABLO CANYON INDEPENDENT SAFETY COMMITTEE (hereinafter referred to as the "Committee") and G. Kenneth Koves, Ph.D. ("Consultant"), as follows:

Recitals

A. In December 1988 the California Public Commission ("CPUC") approved and adopted a settlement agreement between Pacific Gas & Electric Company ("PG&E"), the Division of Ratepayer Advocates of the CPUC, and the Attorney General of the State of California relating to Diablo Canyon Nuclear Power Plant ("DCPP"). California Public Utilities Code Section 712.1, as amended, recognizes the establishment of the Committee by the CPUC to make recommendations appropriate to enhance the safety of the operation of DCPP. The Committee was established and chartered as a three-member California state advisory body to review PG&E's adherence to safety standards at DCPP, conduct site visits, review DCPP operations, and prepare reports and suggest any recommendations for safe operations. In Decisions D.88-12-083, D.97-05-088, D.04-05-055, D.07-01-028 D.23-08-004, and D. 25-06-002 the CPUC has provided for the continuing operation of the Committee in order that it might fulfill its responsibilities.

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In consideration of the mutual promises contained herein, the Committee and Consultant hereby agree to the following terms and conditions:

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If to Consultant, addressed to the address set forth below, or at such other address in the continental United States as Consultant may furnish to the Committee in writing:

Dr. G. Kenneth Koves

[REDACTED]

[REDACTED]

Mobile: [REDACTED]

[REDACTED]

If to the Committee, addressed to the Committee, at the address set forth below, or at such other address in the continental United States as the Committee may furnish to Consultant in writing:

Diablo Canyon Independent Safety Committee
c/o Office of the Legal Counsel
P.O. Box 4523,
Carmel-by-the-Sea, CA 93921-4523
Telephone: (831) 647-1044; (800) 439-4688 (In CA only).
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18. Counterparts. This Agreement may be executed in two counterparts, each of which shall be deemed an original but both of which shall constitute one and the same instrument. Delivery of an executed counterpart with a party's signature by electronic imaging (pdf) shall be effective as delivery of a manually executed counterpart.

19. Effective Date. This Agreement is effective on the date first written above and shall continue unless terminated earlier as provided herein.

DIABLO CANYON INDEPENDENT
SAFETY COMMITTEE

G. KENNETH KOVES


By _____
Per F. Peterson, Chair
Date: December 16, 2025


G. Kenneth Koves
Date: December 28, 2025

EXHIBIT "A"

SCOPE OF SERVICES

1. Participation in technical and programmatic reviews of the safety of Diablo Canyon Power Plant nuclear operations regarding matters in connection with human factors, safety culture, and management systems, in certain DCISC public meetings, and in the development of the DCISC fact-finding reports and Annual Report concerning matters in which the Consultant participated. Provide support to the Committee as requested by Committee members. These tasks include, but are not limited to: reviewing Committee, PG&E, and documents from other sources as the basis for recommending potential issues or concerns that the Committee may wish to pursue; participating in certain Committee fact-finding visits and tours of Diablo Canyon Power Plant; helping to identify additional supporting specialists and developing background material on specific issues; and reviewing, preparing and presenting reports and public presentations concerning these activities.
2. Attendance at one Committee fact-finding visit and one public meeting during calendar year 2026.

DIABLO CANYON INDEPENDENT
SAFETY COMMITTEE

CONSULTANT


By _____
Per F. Peterson


G. Kenneth Koves

EXHIBIT B

Diablo Canyon ISC
Committee Policy No. 6

CONSULTANT GUIDELINES

The Diablo Canyon Independent Safety Committee (DCISC) may contract with consultants to perform various tasks in its review of the safety of operations of the Diablo Canyon Power Plant. The following are guidelines for consultant agreements and activities:

1) Prior to charges being made for services rendered, a consultant shall sign a written agreement that has been signed by the Chair or a designated DCISC member and approved by the affirmative vote of at least two-thirds of the members of the DCISC. A proposed standard form of Agreement is attached hereto.

2) Consultant work shall not commence without a specific scope of services description which shall be signed by the Chair or a designated DCISC member and approved by the affirmative vote of at least two-thirds of the members of the DCISC or attached as part of the signed agreement referred to in paragraph 1. A sample specific scope of services is attached.

3) The signed original of the Agreement and Specific Scope of Services shall be sent by the Chair or designated DCISC Member to the DCISC Legal Counsel for retention, with copies to the other DCISC members and the contracting consultant.

4) Any consultant recommendations in reports shall be made as recommendations to the DCISC which will review and decide on disposition. Consultant reports shall be marked and considered as drafts until approved by the affirmative vote of at least two-thirds of the members of the DCISC. The Chair or designated DCISC member shall review and approve for presentation draft reports prior to the Consultant's presentation at a DCISC public meeting.

Copies of draft reports shall be distributed to all DCISC members and the DCISC Legal Counsel prior to the Consultant's report at a public meeting and subsequent final approval by the affirmative vote of at least two-thirds of the members of the DCISC.

5) Consultant charges for travel expenses shall be for actual expenditures with receipts for charges of \$25.00 or more and for all lodging. The attached form is to be used for submittal for reimbursements.

6) Time reporting shall be as follows:

- a) Report time to nearest 0.25 hours.
- b) A "standard day" is defined as the normal eight-hour working day.
- c) All DCISC actual work-time and travel-time during the "standard day" is charged.
- d) All time on-assignment or on-location during the "standard day" is charged.
- e) DCISC actual work-time outside the "standard day" is charged at standard rates.
- f) DCISC travel-time outside the "standard day" is not charged unless it includes DCISC work.

7) Contracts entered into with consultants or experts for a particular project shall include an estimated total cost for such work, which amount shall not be exceeded without prior authorization by the Committee Chair and ratification by the affirmative vote of at least two-thirds of the members at a regular Committee meeting.

[Adopted June 1994; Revised October 2003]

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE	
AGENDA TRANSMITTAL FORM	
MEETING DATE:	February 19, 2026
AGENDA ITEM:	XXII- H
AGENDA TITLE:	Review and Discussion of the Open Items List and Status of Recommendations.
CONSENT [] ACTION [X] INFORMATION [X]	
Staff Summary: It is anticipated that the Committee will hold discussion concerning the items appearing on its Open Items List prepared by Committee Technical Consultant McWhorter with the assistance of Consultant Wardell. The Open Items List now includes a record and the current status of recommendations made by the Committee for future Committee actions and review and recommendations made by the Committee to PG&E.	
RECOMMENDED COMMITTEE ACTION: As appropriate, review and provide direction.	

Diablo Canyon Independent Safety Committee Open Items List

Open Item Type: **M= Monitor** **F = Follow-up** **I = Issue** Items in **Red (Tracked Changes)** are new or revised
Items in **Yellow** are for the next PM and 3 FFMs

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
OPEN ITEMS:				
CO		Conduct of Operations (CO)		
CO-7	M	Review DCCP storm response experience and strategy every two years [or as necessary] during or after annual winter storm season.	5/17FF 3/21FF	As necessary <i>Mid-2026</i>
CO-8	M	Monitor all reactor trips – automatic and manual – and forced outages. (review trip LERs at public meetings). [Last reviewed 11/23 Pressurizer Safety Valve internal leak Root Cause Evaluation (1X25 forced outage) at 9/24FF.]	9/24FF	Post-trip FFs & PMs
CO-9	F	Reactivity Management – review every 18-24 months.	List end of OIL 4/24FF 7/25FF	Regularly
CO-10	M	Mispositioning Errors (Equipment Status) – monitor the status of mispositioning errors and actions to resolve.	4/23FF 5/24FF	2Q26FF 4/26FF
CM		Conduct of Maintenance (CM)		
CM-7	I	Review PG&E's progress in complying with (1) the amendment to 10CFR50.55a, which provides the requirements for ISI of containment structures (degradation) and (2) ASME Code requirements for steel liner weld inspections.	7/22FF 12/25FF#2	Each Pair of RFOs
CM-10	M	Online Maintenance: review the implementation of online maintenance bi-annually, including the 12-week Rolling Maintenance Schedule about how well it is working & impacting risk. Review trend of amount of online maintenance. DCCP Assessment of Maintenance Risk and Online Maintenance Risk Procedures have been substantially upgraded with the addition of an Integrated Risk Review Team.	See list at end of OIL 11/24FF 12/25FF#2	Regularly
CM-13	M	Review Maintenance Department performance measures, staffing, etc. approximately annually.	5/24FF 12/25FF#2	4Q26FF
EN		Engineering Programs (EN)		
EN-16	F	DCCP Systems – review a system (or structure or component), system health, long-term plan, Maintenance Rule performance & walkdown with System Engineer at FFs. [Note: Systems reviewed are listed with dates at the end of this Open Items List.]	See list at end of OIL	Regularly

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
EN-19	F	Review every 12-18 months major Engineering Programs, including Configuration Management, Management, System Engineering (system health & long-term plans), Valve Testing, Margin Management, Staffing, etc. [Note: Programs reviewed are listed with dates at the end of this Open Items List.]	See list at end of OIL	Regularly
EN-20	F	Each Member should review or observe Plant Health Committee, Notification Review Team (NRT), Corrective Action Review Board, Performance Review Quarterly Meeting, Plant Health Prioritization Committee, Plant Health Working Group, Outage Management Team and other regular meetings.	See list at end of OIL	Regularly
EN-21	F	Regularly review projects long-term planning. Reviews of planned projects completed through 2R25.	6/24PM 1/25FF	2Q26FF 5/26FF
HP		Human Performance: Human Errors and Improving Safety & Efficiency of Plant Performance		
HP-1	M	Review human performance & human behavior items (including error reduction programs, HP Pls, aberrant behavior statistics, FFD, stress reduction programs, Personnel Accountability Policy, Human Performance Steering Committee & Subcomm, Centers of Excellence, Org. Development). [Review biennially operator aging, physical fitness, "no solo" issues, attention enhancement, stress management, & incentives for operator focus.]	8/24FF 1/25FF	2Q26FF 4/26FF
HP-25	M	Further observations and improvements in the Management Observation Program should be reviewed by DCISC.	12/23FF 5/25FF	2Q26FF 5/26FF
HS		Health, Nuclear Safety and Safety Conscious Work Environment		
HS-6	F	Follow DCCP progress in establishing/improving its safety culture (and its subset Safety Conscious Work Environment, including Nuclear Safety Culture Monitoring Panel (NSCMP), and their periodic reports, and including Employee Concerns & Differing Professional Opinion Programs).	1/25FF 8/25FF	4Q26FF
PI		Performance Improvement Programs		
PI-1	M	DCCP Performance Improvement Programs: Corrective Action, Self-Assessment, Operating Experience, Benchmarking, etc. Programs reviewed are listed with dates at the end of the Open Items List. [CAP reviewed 8/24FF – satisfactory.] [Observed Corrective Action Review Board 5/25FF – satisfactory.] [Reviewed Cause Evaluation Process 1/25FF and 4/25FF – satisfactory.]	See list at end of OIL 4/25FF 1/26FF	Annually 1Q27FF
PI-2	F	Follow DCCP's use of electronic procedures and work orders to begin in 2025. [See also Recommendations D12/24FF-3.2, D12/15/25FF-3.14, and P12/24FF-3.2.]	7/25FF 8/25FF	5/26FF PFP
PI-3	F	Because the application of Artificial Intelligence tools has significant potential to change and to improve DCCP's operational safety, the DCISC should review this topic frequently. Possible applications include: Corrective Action Program; Design and Licensing Information Data; Design Change Process; Procedure Generation. [See also Recommendation D12/24FF-3.4.]	7/25FF 8/25FF	4Q26FF
EP		Emergency Preparedness (EP)		

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
EP-2	M	Attend and observe DCCP emergency drills and exercises annually [including Hostile Action Based Exercises], paying special attention to JIC communications to the media and public, including radiation release communications to the public, use of social media, coordination of information release with SLO County, and extension of drills to better exercise FMTs & JMC. DCISC drill attendees should assure the confidentiality of the drill scenario by keeping the scenario hidden and under their control at all times. [Observed Evaluated Exercise 7/31/24]	7/24FF 9/24FF	Next evaluated exercise - 7/29/26 NM 9/2/26 ROS
EP-3	F	Meet with Emergency Preparedness Group for updates and performance in years with no major exercises. Met with SLO County OES 3/25FF and 12/25FF#1.	10/25PM 12/25FF#1	1Q27FF
RA		Risk Assessment and Management (RA)		
RA-5	M	Review overall [non-seismic] PRA program annually. Include Fire PRA Upgrade & Shutdown Analysis. Review PRA Group resources/capabilities. (see SC-6).	11/24FF 12/25FF#2	6/26PM
RA-6	F	Review DCCP response to NRC re: 10CFR50.59 risk-informed rule changes. Review in FF.	2/25PM 12/25FF#2	6/26PM
NS		Nuclear Safety Oversight and Review (NS)		
NS-5	M	Monitor NSOC meetings periodically to observe their processes and their review of nuclear safety issues.	6/27/25 NM 12/11/25 ROS	2/26/26 NM 4/26FF 7/16/26 PFP 7/26FF
NS-9	M	Monitor DCCP's program to track INPO Areas for Improvement. Review with DCCP Coordinator. [Last reviewed 2024 WANO Peer Review and 2025 Mid-Cycle Self-Assessment.]	9/25FF	4Q26FF
NS-10	M	Monitor Insurance Programs including the results of insurer inspections and reports.	5/24FF 7/24FF	5/26FF PFP
NS-11	F	Meet with representatives of the PG&E Corporation Board Safety and Nuclear Oversight Committee members periodically to monitor their processes and their reviews of nuclear safety issues. [NM met with two members on 6/17/25.]	8/25FF	3Q26FF
RP		Radiation Protection (RP)		
RP-3	M	Review Radiation Protection performance. Observed ALARA Committee meeting at 4/24FF.	6/25PM 12/25FF#2	Regularly
RP-12	M	Review annual DCCP radioactivity release report each year. Review at Summer or Fall FFs.	7/24FF 7/25FF	3Q26FF
QP		Quality Programs (QP)		
QP-3	M	Review the activities, organization and results of QV audits as well as PG&E's outside biennial audits, including timeliness of corrective actions. Review annually – include 4 th quarter QPAR with yearly results.	12/24FF 1/26FF	1Q28FF
QP-9	F	Software QA Program	See list at end of OIL	4Q26FF 4/26FF

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
NF		Nuclear Fuel Performance (NF)		
NF-9	M	Nuclear Fuel Performance & Issues (review after RFOs). Observed new fuel receipt and inspection 8/22FF.	1/24FF 3/25FF	Each pair of RFOs
ER		Equipment Reliability and Life Cycle Management (ER)		
ER-5	M	Monitor the Equipment Reliability Process approximately annually.	See list at end of OIL	Annually 2Q26FF 5/26FF
OE		Organizational Effectiveness & Development (OE)		
OE-1	F	Review DCCP Operating Plan each January after development.	2/25PM	2/26PM 6/26PM
OE-2	F	Station Excellence Plan & Management Review Meeting [Check status of this plan and the meetings.]	3/23FF	3Q25FF 4/26FF
SE		System and Equipment Performance/Problems (SE)		
SE-39	F	Review and tour the inspections and repairs of concrete Intake Structures following selected refueling outages. [See if Outfall has similar issues – Toured 4/25FF, satisfactory.]	4/25FF 5/25FF 12/25FF#1	Next RFO
SE-49	F	Emergency Diesel Generators (EDGs)	See list at end of OIL 4/24FF 9/25FF	Regularly
SE-50	F	Maintenance Rule Functional Failures [Change from SSFFs to MRFFs beginning 3/21FF.]	11/23FF 7/25FF	Regularly
OM		Outage Management (OM)		
OM-3	M	During outages, monitor Outage Coordination Center, Control Room, and containment walkdown/inspection (end of outage). Review outage turbine work. Review Steam Generator performance metrics and inspection results.	5/25FF 12/25FF#2	Each RFO
OM-4	M	Review Outage Safety Plan, safety margin trends, outage results, including clearances, following each outage at FFs and PMs.	9/25FF 12/25FF#2	Each RFO
OM-5	M	Review FME Program Performance.	See list at end of OIL 12/25FF#2	Each RFO
SEC		Security (SEC)		
SEC-3	M	Monitor interaction of Security and Operations, Engineering, Maintenance, and Emergency Preparedness for effects on nuclear safety. Plant security per se not reviewed but reviewed only in the context of impact on plant operation.	3/25FF 1/26FF	1Q28FF
SEC-4	M	Review status of DCCP cyber security (but not physical security) program in compliance with NRC requirements.	1/23FF 3/24FF	3Q25FF 4/26FF
SF		Independent Spent Fuel Storage Installation – ISFSI (SF)		

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
SF-1	F	Monitor ISFSI operations. Review and observe 2026 loading campaigns. (See Also D12/15/25FF-3.11A)	12/24FF 12/25FF#2	6/26PM 3Q26FF
SF-2	M	Follow technical advances of relative risks of existing (Holtec) casks and pool storage. ISFSI License Renewal Issued on 6/20/25. (See Also D12/15/25FF-3.11B)	9/25FF 12/25FF#2	As Needed
SF-4	F	Review the adequacy of the design for new (Orano) spent fuel TBD storage system focusing on items of safety significance including seismic adequacy, criticality control, storage of damaged fuel, thermal analyses, effects of extreme environmental conditions, long-term (>100 years) integrity assurance, radiation/neutron shielding, and accident analyses.	1/23FF 8/23FF#2	TBD
SF-5	F	Monitor the submittal and approval of license amendment(s) for the Orano spent fuel storage system.	6/23PM 8/23FF#2	TBD
SF-7	M	Monitor Plans for Storage of Greater than Class C Waste	8/22FF	TBD
SF-8	M	EPRI study [Radiological Consequences of a Release of Radionuclides from a Spent Fuel Storage Cask] has not yet finished although some supporting studies have been concluded regarding source term and what flow rate should be estimated for use in the study. He reported EPRI plans to issue its study in early spring of 2023 and the DCISC should review it at that time. Update 5/23/25 – study completion deferred until 2025 to obtain additional research data from DOE. Completion date unknown.	5/23FF#1 12/25FF#2	4Q27FF
SF-9	M	Monitor the implementation of aging management plans including any evaluations of canister corrosion indications by DCCP and the nuclear industry.	9/25FF 12/25FF#2	6/26PM
SC	M	Seismic, Tsunami and Other External Events		
SC-3	M	Long-Term Seismic Program: review periodically. (See also EO-9.). Met with Geosciences Staff 11/24FF (LTSP, IPRP, Dr. Peter Bird) 11/24FF. [See also SRT Recommendations 1-9.]	9/24FF 11/24FF	1/26FF 4/26FF LTSP NM
SC-12	F	Workplace seismic safety – review annually.	5/25FF 7/25FF	4Q26FF
SC-14	M	Monitor the Work of the Independent Peer Review Panel, Including Future Reports	9/24FF 10/24PM	As needed
SC-15	M	Review significant seismic events with the potential to affect DCCP as they occur.		As needed
FP		Fire Protection (FP)		
FP-5	M	Review NFPA-805-based Fire Protection Program and Systems every two-three years, including QV audits and NRC triennial inspections. Review the health and correction of degraded systems every six months. Monitor fire doors (Plant Door Life Cycle Management Plan) for correction of impairments.	See list at end of OIL 9/24FF	Regularly 23Q26FF
LD		Learning & Development Programs (LD)		
LD-3	M	Review non-license technical, operations & accredited training programs at least annually. [Reviewed Learning Services 5/24FF – satisfactory.]	5/24FF 9/24FF	3Q26FF 3/26FF

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
LD-6	M	Observe operator <u>license</u> , re-qualification, classes periodically in FF meetings.	12/24FF 8/25FF	<u>4/26FF</u> <u>4/26FF</u> Simulator Trg. NM
<u>LD-7</u> NR	<u>F</u>	<u>Review the impact of Artificial Intelligence on training programs.</u> Nuclear Regulatory Commission Items (NR)		<u>3/26FF</u>
NR-3	M	Monitor the Non-Cited Violations at every Public Meeting.	Each PM	Each PM
NR-4	F	Meet with NRC Resident Inspectors regularly.	Most FFs	Regularly
NR-5	F	Follow proposed Presidential Executive Orders driven changes to NRC as to their impact on DCCP. [10/25PM Presentation delayed due to government shutdown, reschedule for 2/26PM.]	6/25PM	<u>2/26PM</u> <u>6/26PM</u>
NR-6	M	Review any NRC Inspector General Reports or NRC employee Differing Professional Opinion filings which may relate to DCCP.		As needed
DEC	F	Decommissioning		
DEC-1	F	Review DCCP decommissioning plans periodically as a result of the Joint Proposal plant shutdown in 2025. Review the timing of spent fuel transfer from wet to dry storage and when the spent fuel pools are decommissioned the plant will lose the capability to open multipurpose canisters for inspection. DCISC should actively review the decommissioning plans for DCCP because of the potential impact on staffing and future options with respect to managing spent fuel.	2/23PM 6/23PM	TBD ACK
DEC-4	F	Emergency preparedness during decommissioning.	11/22FF 2/23PM	TBD ACK
DEC-5	F	DCCP's approach to submitting LAR requests for decommissioning appears appropriate and the DCISC should continue to follow from a safety perspective all the regulatory activities which will define the reduction in requirements which will occur at shutdown.	9/22FF 9/22PM	TBD ACK
EO		Extended Operations (EO)		
EO-1	M	Monitor the Purchasing of New Fuel [12/22FF fuel performance & future purchases satisfactory for 2030 operation.]	12/22FF 3/25FF	4Q26FF
EO-3	M	Monitor the State and Local Permitting Process	6/24PM 2/25PM	2/26PM
EO-4	M	Monitor the NRC License Renewal Application and Review Process, including any seismic-related activities.	8/24FF 2/25PM	2/26PM
EO-5	M	Monitor Staffing for Extended Operations	2/25PM <u>1/26FF</u>	<u>2/26PM</u>
EO-9	F	Review new seismic safety-related information from the IPRP, Dr. Peter Bird, NRC petitions, and any other third-party sources. Consider all future actions.	2/25PM 6/25PM	As Needed
EMB		Unit 1 RPV Embrittlement		

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
EMB-3	F	[Former SE-26] Review reactor pressure vessel compliance status after next set of surveillance samples (Capsule B) is analyzed and effective vessel lifetime projections are updated.	<u>12/25FF#1</u> <u>1/26FF</u>	<u>7/26FF</u>
EMB-6	F	Review and comment on all new questions or requests for information related to vessel embrittlement in LRA proceedings. <u>M. Kirk reviewed LRA NRC Safety Evaluation Report Section 4.2, letter dated 1/13/26.</u>		<u>As needed</u>
O		Other Items (O)		
O-1	F	Perform observations of evolutions (work processes) within the plant periodically. Continue with these about annually. Work process observations: Observe in the plant work processes important to nuclear safety, such as operator rounds, Control Room shift turnover, surveillance tests, preventive and corrective maintenance, system modifications, system walk downs with system engineers; outage activities, etc.	4/24FF 4/25FF	Regularly <u>3/26FF</u> <u>4/26FF</u>
O-3	F	Review studies/reviews of drone activity at DCP.	2/21PM <u>12/25FF#2</u>	<u>As Needed</u>
O-4	F	Review plant activities since previous FF meeting ("Station Update") [Review continuance at 10/25PM]		Each FF

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
PUBLIC MEETING ITEMS: (Reference: Public Meeting Minutes)				
6/24 PM 4	F	Direction was provided to explore a tour with members of the public in conjunction with the February 18-19, 2026 public meeting. [Deferred to February 2026 PM due to unavailability of the DCCP Simulator in June and Outage in October 2025.]		<u>2/26PM</u> <u>6/26PM</u> <u>then Close</u>
2/25 PM 5	F	Dr. Peterson observed that sometimes during fact finding a Notification is generated which enables the item to be entered into the Corrective Action Program. He commented the creation of a process map would be useful and he recommended the Committee take an action to create a process map, first for PG&E's review and comment and for the member's review and discussion at the next public meeting.	2/25PM	<u>2/26PM</u>
20	F	In response to Consultant Wardell's inquiry as to whether workplace seismic safety training is part of the initial or continuous training for new employees Mr. Jones stated he would need to check on and follow up during subsequent fact finding and he stated he did not believe specific workplace seismic safety training was part of initial training for new employees.	2/25PM	<u>Response received</u> <u>1/29/26</u>
21	F	Dr. Meshkati requested Mr. Jones to share information on benchmarking efforts with the oil and gas industry concerning Process Safety Management Application, and Mr. Jones stated he would take an action to do so during a future fact finding.	2/25PM	<u>Close to</u> <u>1/26FF</u>
4	F	Dr. Peterson observed that the NRC has issued the Safety Evaluation Report (SER) for the license extension and the Committee should review the SER.		M. Kirk to Review LRA SER Sec 4.2 <u>Complete.</u> <u>Close</u>
10	F	Dr. Peterson observed the Committee has always taken an independent view as to safety and while he believes there is a very strong case that the Unit 1 reactor pressure vessel is in compliance with regulations, he observed the Committee should continue to investigate, while recognizing a consensus that the analyses show that the Unit 1 reactor pressure vessel is in compliance with embrittlement regulations including regulation methodology for quantifying uncertainty. Dr. Peterson stated his recommendation was contingent upon the individual DCISC members identifying additional issues to investigate to allow the Committee to potentially understand better alternate approaches to quantifying uncertainty.		M. Kirk to Review LRA SER Sec 4.2 <u>Close to</u> <u>Completed</u> <u>Eval. and</u> <u>EMB-6</u>
23	F	Dr. Budnitz observed that after the work to address the Committee's recommendations is completed there will be some new insights among which could be that the seismic hazard at DCCP has not changed very much, or if what is learned modifies the seismic hazard then the next action is to ask the question what is the implication on the understanding of the safety of the plant? He recommended the Committee follow this in context of the broader picture and if important changes based on the best science are identified then the implications for overall seismic safety needs to be determined on a high priority basis.		2/26 PM (SRT Recs and LTSP impact)

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
33	F	Dr. Meshkati's question as to whether the recurring issue with the ASW System pump repair should have been assigned a common cause evaluation Mr. McWhorter commented the root cause evaluation has a very extensive extent of condition component that reviews whether the problem has occurred elsewhere in the plant and Mr. McWhorter suggested Dr. Meshkati may want to explore this question further with the plant. A PG&E representative recommended that Dr. Meshkati raise his question about the ASW pump with the Performance Improvement organization.		<u>Close to 1/26FF</u>
34	F	Mr. Rathie stated the process for addressing recommendations and concerns will affect and complicate development of the Open Items List which is a very useful tool used by the Committee in its reviews. Dr. Peterson observed it is important for the Committee to have a specific process to address and track its recommendations and concerns and to close them when appropriate.		<u>2/26PM</u>
36	F	Dr. Peterson observed that the SRT's report did not evaluate the hazard, as that was completely out of the scope of their assignment which was to review the documents and associated materials that make up the Bird Critique. Therefore, it is important for the Committee to understand the sensitivity question of how these arguments would affect the assessment of the hazard to the plant, which ultimately is what the Committee should care about in terms of decisions around safety.		
<u>10/25 PM 1</u>	<u>E</u>	<u>Mr. Tyman reported the NRC has been reviewing several License Amendment Requests (LARs) and has approved LARs for: online monitoring to enable the use of Analysis and Measurement Services Corporation's methodology to inform time-based surveillance frequency requirements and calibrations for channels and reviewing frequency requirements based on performance and data gathered; optimized zero fuel cladding. Dr. Peterson observed online monitoring can relate directly to operational safety and he directed this topic be scheduled for a future fact finding.</u>		<u>Close to 12/25FF#2 and D12/15/25F F-3.3</u>
<u>2</u>	<u>E</u>	<u>Dr. Peterson reported the Committee is considering how additional opportunities could be identified where the application of AI could affect the goal of operational safety and it would be good for the Committee to identify future use cases as in the future the DCISC is likely to recommend that PG&E pursue certain of them as there is an opportunity cost not to proceed expeditiously.</u>		<u>Close to PI-3 and D12/24FF-3.4</u>
<u>3</u>	<u>E</u>	<u>In response to Consultant McWhorter's observation about use of a video for a pre-job briefing on the tedious task of setting the actual thrust preload on an auxiliary saltwater pump motor, Mr. Tyman commented DCCPP maintains a library of videos that are used not only in routine training of operators but also for maintenance technicians and he offered to review their use at a future fact finding.</u>		<u>Close to 11/25FF</u>
<u>4</u>	<u>E</u>	<u>In concluding her remarks Dr. Gil stated her recommendations: to adopt and adapt the NIST AI risk management framework, to develop metrics and measures for AI systems in an operational context, to consider a combined readiness level ratings that evaluate technical systems and their maturity, and to incorporate human readiness level assessments that focus on the operator's ability to use a system so that the entire system behaviors and risks are being managed as desired. Dr. Peterson then thanked Dr. Gil for a very interesting presentation and stated he agreed on the need to review this rapidly revolving topic on a frequent basis, that is, every two or three months.</u>		<u>Close to PI-3 and D12/24FF-3.4</u>

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
<u>5</u>	<u>E</u>	Concerning SB 53, Dr. Gil stated the DCISC should be aware of and up to date on the reports coming from the foundation model companies about any kind of catastrophic risk. She remarked it would also be important to track how Neutron Search is being used and if any documents are in its operation in order to convey that information and any safety concerns to the developers of the model.		
<u>6</u>	<u>E</u>	He [Dr. Budnitz] identified a second problem he termed sycophancy related to the generation of results again and again and AI gives the user what the user wants to get rather than what the user should get as a result of the AI using only a subset of information which can create an incomplete or even erroneous results. He stated he believed the ability to review those new AI failure modes is one the Committee does not possess and how that will be reviewed is a challenge of great importance for the DCISC.		
<u>7</u>	<u>E</u>	The FFT met with and requested additional information and are included as Enclosure 1 to the Fact Finding Report. The FFT concluded responses were received to questions and the additional information received should be reviewed during future fact-finding in December 2025 and a recommendation to the Committee was made in the Fact Finding Report.		<u>Close to 12/25FF#2</u>
<u>8</u>	<u>E</u>	Consultant McWhorter reported the Corrective Action Program has been changed such that in the future when procedural changes are driven by a RCE they will be reviewed by and agreed to by a RCE evaluation team member to ensure the intent of the RCE evaluation team is met by the change. The FFT concluded the evaluations were complete as to why the procedural changes were ineffective in 2018 to prevent a recurrence in 2023 and effective corrective actions are now in place. Mr. McWhorter reported that the Recommendation to PG&E on this issue is recommended by the FFT for closure.		<u>Close to 8/25FF and 10/25PM closure of P1/25FF-3.3A and 3.3B</u>
<u>9</u>	<u>E</u>	Mr. McWhorter remarked concerning grid inertia, a topic raised during public meetings by Dr. Gene Nelson, it is an issue that the Committee should follow as there is a potential for an effect on safety, but it is not a current issue affecting DCP.		<u>Close to note added to EN-16 230/500kV</u>
<u>10</u>	<u>E</u>	An operability determination based on mission time was performed and EDG 2-2 was returned to operability without the leak being repaired with repair scheduled for the next maintenance window. The FFT found the EDGs had no major equipment issues, two equipment failures being addressed in the Corrective Action Program and the FFT made a recommendation for follow up concerning the operability determination/mission time documentation at a future fact finding.		<u>Close to 12/25FF#1</u>
<u>11</u>	<u>E</u>	Dr. Peterson observed Ms. Chu's comments were consistent with written questions she submitted earlier and the DCISC will take an action to follow up on her questions.		<u>Close to 12/25FF#2</u>
<u>12</u>	<u>E</u>	Mr. Wardell reported a Recommendation (P12/24-3.6) has been made to PG&E to review why an extent of condition for an unbraced cabinet found in July 2024 did not prevent a similar condition identified by the DCISC in December 2024. He reported this Recommendation was subsequently completed and closed.		<u>Close to 5/25FF and 6/25PM closure of P12/24FF-3.6</u>

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
<u>13</u>	<u>F</u>	Mr. Wardell reported DCCP is moving ahead, starting with the Operations organization, with implementing use of electronic procedures and he stated this is an area the DCISC has been following closely as a good way to improve human reliability and plant safety and has endorsed and made a Recommendation supporting the plant's plans for the use of electronic procedures.		Close to P12/24FF-3.2
<u>14</u>	<u>F</u>	He [Mr. Wiseman] stated that given this situation there may be more emerging issues under 10 CFR 50.59 and he remarked this may be an issue for the DCISC to address through the Open Items List. Mr. McWhorter commented out of the list [of Plant Health Committee top ten items] perhaps four or five items had obsolescence concerns identified and projects, including for the Annunciator System, are planned to address those. Mr. Weisman observed that in some cases parts will likely simply need to be replaced for reasons other than obsolescence and he asked what would happen if there were no OEM replacements available. Dr. Peterson remarked that Mr. Weisman raised a valid point and the issue should be added to the Open Items List in context of the DCISC review of DCCP's 10 CFR 50.59 Program.		Review as part of next 50.59 program review.
<u>15</u>	<u>F</u>	The second set of the SRT's recommendations are focused on geodesy and the SRT has done a preliminary geodetic analysis and urges PG&E to expand that analysis to develop a more complete study of the available global positioning data (GPS). Dr. Jordan remarked the fault model developed by PG&E should be further developed into a kinematic and mechanical model that can predict the inner seismic deformation and thus be directly compared with the GPS data.		Close to SRT-1 to -9
<u>16</u>	<u>F</u>	Dr. Jordan reported the final recommendation is an over-arching one that recommends PG&E should conduct modeling experiments to ascertain the sensitivity of the hazard in the plant to the recommended modifications including a decrease in the dip of the faulting, a re-weighting of the fault models to favor what is called the Southwest Vergent Model, and to re-evaluate the hazard of the Los Osos Fault trend.		Close to SRT-1 to -9
<u>17</u>	<u>F</u>	In response to Dr. Peterson's query Ms. Van Buren reported OES has not incorporated AI with respect to DCCP emergency response, but it is open to doing so and expects to review the issue in the future. Dr. Peterson stated the DCISC should follow OES progress with implementing AI solutions in context of its review of a wide array of different AI applications which could affect DCCP operational safety.		
<u>18</u>	<u>F</u>	[Discussion of OIL] New Item PI-4? AI Impact on Training ROS/TBD		Close to new LD-7
<u>19</u>	<u>F</u>	[Dr. Nelson provided a] form of improved public outreach regarding DCCP operational status and plant health and his stated his belief this falls within the public outreach mission of the DCISC and he suggested a joint PG&E/DCISC effort. He stated CGNP is working on legislation to extend DCCP operations beyond 2030 and he believes public outreach should be one component of this legislative package. Dr. Peterson suggested the DCISC should follow up on opportunities to provide more information on the status of the plant.		
<u>20</u>	<u>F</u>	He [Mr. Rogers] reported DCCP has clear guidance with other entities within PG&E that addresses the interface and the decision-making associated with the plant and the down time of the plant and no authorization or clearance from outside DCCP is required. He offered to provide Dr. Meshkati with a copy of the guidance document at a future fact finding.		4/26FF

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
<u>21</u>	<u>E</u>	He [Dr. Peterson] reported Dr. Scarlet and Dr. Meshkati will both have the opportunity to observe an emergency response exercise and the focus of their respective fact finding visits should be on how much information can be obtained and made available to the Committee outside the EOF if in the judgment of PG&E the presence in the EOF itself of Committee representatives could be disruptive.		ROS and NM EP drill observations scheduled on FFPM
<u>22</u>	<u>E</u>	Mr. Jones commented he believes the DCISC should consider working with the State of California Governor's Office of Emergency Services (Cal OES) on the policy and Dr. Peterson agreed that additional investigation would be warranted.		
<u>23</u>	<u>E</u>	Mr. Jones reported there is a bifurcation of tribal recognition between the federal and state governments and the nearest federally recognized tribe are the Santa Ynez Chumash and they are located outside of the Emergency Planning Zone, but the state has a Native American Heritage Commission which recognizes several tribes that are mostly likely descendants from the village sites in the area. He stated there are several tribes in the area including the Yak Tityu Tityu Yak Tihini tribe that are in the Emergency Planning Zone but they do not have facilities and live in the general population. Dr. Scarlet stated this is an area where the DCISC should follow up concerning representation and that all necessary connections are being made.	<u>12/25FF</u> <u>#1</u>	

ITEM NO.	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
RECOMMENDATIONS to the DCISC:			
D11/24FF-3.13	The DCISC should follow up on future corrective actions that may be initiated in response to an August 2024 dropped rod event.	11/24FF	2Q26FF <u>5/26FF</u>
D12/24FF-3.2	Because expanded use of electronic procedures can enhance plant operational safety subject to proper human systems integration, the DCISC should review this topic regularly. [See also PI-2.]	8/25FF <u>12/25FF#2</u>	<u>5/26FF</u> <u>PFP</u>
D12/24FF-3.4	Because the application of Artificial Intelligence tools has significant potential to change and to improve DCCP's operational safety, the DCISC should review this topic frequently. The DCISC should maintain a list of potential future Artificial Intelligence applications that could enhance safety under item PI-3 on its Open Items List.	<u>12/25FF#1</u> <u>12/25FF#2</u> <u>1/26FF</u>	<u>3Q26FF</u>
D1/25FF-3.9A	The DCISC should review the results of a PG&E employee safety culture survey following its completion.	1/25FF <u>1/26FF</u>	<u>Close to</u> <u>1/26FF</u>
D3/25FF-3.12	The DCISC should continue its effort to develop a committee policy for responding to an emergency declaration at DCCP.	<u>12/25FF#1</u> <u>1/26FF</u>	<u>2/26PM</u>
D9/25FF-3.4	The DCISC should follow up with additional review of PG&E's responses to questions and concerns regarding methods used to inspect Independent Spent Fuel Storage Facility Multi-Purpose Canisters for corrosion.	9/25FF <u>12/25FF#2</u>	<u>Close to</u> <u>12/25FF#2</u>
D9/25FF-3.12	The DCISC should further review DCCP's basis for developing mission times used in an operability determination for a jacket water pump seal leak on Emergency Diesel Generator 2-2.	9/25FF <u>12/25FF#1</u>	<u>Close to</u> <u>12/25FF#1</u>
<u>D12/2/25FF-3.1</u>	<u>The DCISC should further review how the Technical Specification-required Completion Time was met for an October 2025 Emergency Diesel Generator 2-2 Jacket Water Pump leak event as well as how a similar event would be handled in the future following approval of the LAR and implementation of a risk-informed Completion Time.</u>	<u>12/25FF#1</u>	
<u>D12/2/25-3.5</u>	<u>The DCISC should review the error analysis for calculations contained in the October 2025 Degradation Assessment for the Unit 2 Steam Generators.</u>	<u>12/25FF#1</u>	
<u>D12/2/25-3.8</u>	<u>The DCISC should review FLEX Support Guidelines for how doors can be propped open, should this action be needed in a severe accident scenario. The propping open of doors can be a useful tool in responding to an unforeseen scenario, and the plant would be well positioned to have tools and training for how operators can effectively achieve the propping open of doors.</u>	<u>12/25FF#1</u>	
<u>D12/2/25-3.11</u>	<u>The DCISC should follow up on the implementation, staffing and necessary training plans for complying with the new National Pollution Discharge Elimination System and Clean Water Act 401 Water Quality Certification, and the overall strategic plan for the Chemistry Department and its interface with Operations and License Renewal.</u>	<u>12/25FF#1</u>	
<u>D12/15/25FF-3.1</u>	<u>The DCISC should review the charter for the Maintenance Department's new Craftsmanship Council after its development is complete.</u>	<u>12/25FF#2</u>	<u>5/26FF</u>
<u>D12/15/25FF-3.2</u>	<u>The DCISC should review the Unit 1 and Unit 2 Containment concrete inspection report, expected to be available after Refueling Outage 1R26 in the fall of 2026. The DCISC should also review DCCP's disposition of this report and any resulting Notifications and repairs.</u>	<u>12/25FF#2</u>	<u>Close to</u> <u>existing</u> <u>CM-7 and</u> <u>EN-16</u>

ITEM NO.	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
<u>D12/15/25FF-3.3</u>	<u>Online Monitoring technology has the potential to increase plant operational safety. DCISC should add Online Monitoring to the Open Item List with a regular periodicity as determined by the DCISC.</u>	<u>12/25FF#2</u>	<u>Close – added to EN-16</u>
<u>D12/15/25FF-3.10</u>	<u>The DCISC should follow-up on the findings and cause evaluation for the affected Feedwater Heat Exchanger tube leak that occurred on December 15, 2025, as well as future plans to address FW Heat Exchanger health.</u>	<u>12/25FF#2</u> <u>1/26FF</u>	
<u>D12/15/25FF-3.11A</u>	<u>The DCISC should request that PG&E make a presentation on the summer 2026 Independent Spent Fuel Storage Installation inspection campaign at the June or October 2026 Public Meetings and that Member Raluca Scarlat be invited to observe some of the inspections.</u>	<u>12/25FF#2</u>	<u>6/26PM</u> <u>3Q26FF</u>
<u>D12/15/25FF-3.11B</u>	<u>The DCISC should continue to monitor advances in canister inspection methods.</u>	<u>12/25FF#2</u>	<u>6/26PM</u> <u>3Q26FF</u>
<u>D12/15/25FF-3.13</u>	<u>The DCISC should request that PG&E make a presentation at its June 2026 Public Meeting on updates Probabilistic Risk Assessment (PRA) tools and methods, how PRA is being used in the plant, and the NRC's role in approving PRA tools and methods</u>	<u>12/25FF#2</u>	<u>6/26PM</u>
<u>D12/15/25FF-3.14</u>	<u>The DCISC should schedule an observation of electronic procedure usage in the plant during the next FFM of which Member Per F. Peterson is a participant. [See also PI-2 and D12/24FF-3.2.1]</u>	<u>12/25FF#2</u>	<u>5/26FF</u> <u>PFP</u>
<u>D1/26FF3.1</u>	<u>In its 34th Annual Report dated June 30, 2024, the DCISC recommended to the California Public Utilities Commission (CPUC) that they "and all other necessary California state authorities support the funding of the plant upgrade projects recommended by DCCP." Consistent with this previous recommendation and subsequent technical evaluations by the DCISC, the DCISC should further recommend to the CPUC that it and all other cognizant California state authorities support the implementation of the Feedwater Heater replacement project at DCCP as soon as practically feasible. The DCISC believes that these replacements are important for the plant's operational performance by avoiding unnecessary plant shutdowns, forced outages, and startups in the future.</u>	<u>1/26FF</u>	<u>2/26PM</u>
<u>D1/26FF-3.3</u>	<u>Based on industry experience with boric acid corrosion, DCISC should implement more rigorous and systematic follow-up of boric acid corrosion monitoring at DPCC.</u>	<u>1/26FF</u>	

ITEM NO.	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
RECOMMENDATIONS to PG&E: (SB 846 requires the DCISC to "make recommendations appropriate to enhance the safety of the operation at the Diablo Canyon powerplant.")			
AR23/24AR23-2	Recognizing that Capsule B test results are not necessary to assure Unit 1 Reactor Pressure Vessel embrittlement acceptability, the DCISC recommends that the Capsule B be removed at the next outage in 2025 and that a re-evaluation of reactor vessel integrity, including both PTS and USE, be performed once the new data from Capsule B become available. [Capsule B removed 4/25; Close after Capsule B evaluation complete (12-18 mos.).]	5/25FF	4Q26FF
P12/24FF-3.2	The DCISC recommends that PG&E further expand their use of electronic-procedures-type applications, subject to proper human systems integration, because the improved human performance and documentation of work can directly improve the safety of operations. [See also PI-2.]	7/25FF 8/25FF	10/25PM 5/26FF
P4/25FF-3.6	PG&E should review if DCPD should have considered developing FLEX guidelines for providing an alternative discharge path for the Auxiliary Saltwater (ASW) System following a Beyond Design Basis event that may cause a collapse of the Discharge Structure or otherwise obstruct the ASW System discharge (P4/25FF-3.6). PG&E has accepted this recommendation and is working to address it under Notification 51283374.	4/25FF 12/25FF#1	Close to 12/25FF#1
P8/25FF-3.1	PG&E should support and facilitate regular meetings (in-person or remotely) between the DCISC and designated members of the Board of Directors' Safety and Nuclear Oversight Committee (SNO) to learn about the Board's safety-related goals, priorities, administrative oversight, and budgetary policies vis-a-vis DCPD, and to review and coordinate strategic issues affecting the plant's equipment systems and occupational safety. [See also new NS-11.]	8/25FF	
<u>P1/26FF-3.3</u>	PG&E should devote additional resources as needed to repair the high number of leaks classified as "L3" in the plant with the aim of achieving the Boric Acid Leak Maintenance performance indicator goals.	<u>1/26FF</u>	
<u>P1/26FF-3.4</u>	Regarding the interoperability of PG&E radio systems with San Luis Obispo County, PG&E should initiate targeted efforts with SLO County to coordinate and test the current means of establishing interoperability between the two systems as soon as possible. Additionally, PG&E should investigate finding another means to establish interoperability between the two systems more easily and quickly during an emergency at DCPD.	<u>1/26FF</u>	
<u>P1/26FF-3.9</u>	PG&E should review and improve the limited guidance in procedures for completing Common Cause Evaluations (CCEs) and elaborate when a CCE should be performed, how it should be systematically completed, and how it should be acted upon	<u>1/26FF</u>	
SRT-1	The SRT recommends the development of a set of kinematically constrained structural models for revers faults underlying the Irish Hills that can explain the folding observed since 5 Ma.	9/25FF	2/26PM
SRT-2	The SRT recommends dating of low-stand abrasion platforms offshore, south of the Irish Hills, to further constrain the rate of footwall subsidence and its contribution to the Southwest Boundary Zone slip rate.	9/25FF	2/26PM
SRT-3	The SRT recommends monitoring of IRSI-dating efforts and reassessment, if necessary, of the MIS 5 age assignments for the Q1 and Q2 terraces surrounding the Irish Hills.	9/25FF	2/26PM
SRT-4	The SRT recommends further investigation of potential strike-slip faulting along the Los Osos trend and its impacts on the pattern of marine-terrace uplift.	9/25FF	2/26PM
SRT-5	PG&E should follow up the SRT's preliminary work with a more complete study of the available GPS data.	9/25FF	2/26PM

ITEM NO.	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
SRT-6	The fault slip models that underlie the DCPP Seismic Source Characterization should be developed into kinematic and mechanical models that can predict the interseismic deformation and can thus be directly tested against the GPS data.	9/25FF	2/26PM
SRT-7	PG&E should compute the relative contributions of strike-slip and reverse faulting to the regional deformation predicted by the SSC24 slip models and compare the values with the geodetic constraints.	9/25FF	2/26PM
SRT-8	Geologic slip-rate information should be acquired from the Rinconada and Huasna faults to permit better modeling of the shear component evident in the GPS data.	9/25FF	2/26PM
SRT-9	PG&E should conduct modeling experiments to ascertain the sensitivity of DCPP hazard to the SSC modifications recommended by the SRT.	9/25FF	2/26PM

DCPP Systems/Components Reviewed Periodically (See EN-16)

4 kV – July 2022
 230 kV & 500 kV – Sep 2025 (included grid stability/inertia)
 Auxiliary Feedwater – Mar 2024
 Auxiliary Saltwater – Mar 2024
 Auxiliary Building Ventilation – July 2025
 Chemical & Volume Control System and High Pressure Injection – Nov 2024
 Component Cooling Water – Mar 2023
 Compressed Air – Apr 2023
 Condensate & Feedwater – Nov 2021 **2Q26FF**
 Containment Structure – ~~July 2022~~ **Dec 2025 #1**
 Containment Spray – May 2022
 Containment Ventilation and H₂ Purge – July 2023
 Control Room Simulator – May 2024
 Control Room Ventilation – July 2023
 Digital Systems April 2024
 DC Power – Mar 2022
 Emergency Diesel Generators – Sept 2025
 Fire Protection & Detection Systems – Apr 2023
 Nuclear Instrumentation & In-core Instrumentation – Aug 2025
 Plant Protection System – Mar 2023
 Radiation Monitoring – May 2023
 Radwaste Processing Mar 2024
 Reactor Coolant System & Pumps – Apr 2023
 Buried Piping & Tanks – May 2023
 RCS Process Control System – Dec 2024
 Refueling Equipment – May 2024
 Residual Heat Removal – Nov 2024

Rod Control & Indication – Aug 2023
 Safety Injection Pumps – Nov 2024
 Spent Fuel Pool Cooling & HVAC – Mar 2025
 Steam Generators – ~~Aug-2023~~ **Dec 2025 #1**
 Special Protection System – Mar 2020
 Turbine-Generator – Jan 2023

DCPP Programs Reviewed Periodically (See EN-19)
 10CFR50.59 Program – Nov 2024
 ALARA – May 2022
 Aging Management Programs – Dec 2025 #1
 Air Operated Valves – Jan 2024
 Benchmarking – Mar 2022
 Boric Acid Corrosion Control – Aug 2023 Jan 2026
 Chemistry – May 2025 Dec 2025 #1: March 2026
 Cranes – Dec 2021
 Configuration Management – Mar 2025
 Corrective Action – CARB – May 2025
 Emergency Preparedness– Dec 2023: March 2026
 Employee Concerns Program – Aug 2023
 Equipment Environmental Qualification – Dec 2022
 Equipment Reliability – May 2024 May 2026
 Fire Doors & Door Life Cycle Mgm't. Plan – Jan 2022
 Fire Protection Program (NFPA-805) – Sep 2024
 FLEX Program – Aug 2025
 Flow Accelerated Corrosion – May 2022
 Foreign Material Exclusion – May 2025 Dec 2025 #2
 Greater Than Class C Waste – Aug 2022 PFP
 In-service Inspection Program – Jul 2023
 Integrated Risk Assessment Program – Mar 2022
 Large Motors – Jul 2023
 Long-Term Capital Planning Process – May 2023
 MIDAS – May 2024
 Maintenance Rule – Jul 2025
 Margin Management Program – April 2024
 Motor Operated Valves – Jan 2024
 Notification Review Team – Mar 2022 Dec 2025 #2
 Nuclear Fuel Program – Mar 2025
 Nuclear Insurance Programs – July 2024 May 2026
 Online Maintenance – Sep 2024 Dec 2025 #2
Online Monitoring – Dec 2025 #2
 Operating Experience – Jul 2025 (review biennially)
 Operability Assessment Program – Jan 2022
 Operational Decision Making – April 2024
 PRA Programs (non-seismic) – Sep 2022
 Performance Improvement – Sep 2023 PM
 Performance Review Quarterly Meeting – Apr 2021
 Plant Health Committee/Subcommittee – Aug 2025

Plant Health Prioritization Committee – Aug 2023
 Plant Staff Review Committee – Nov 2024
 Reactivity Management – July 2025
 Safety-Security Interface – Mar 2025 Jan 2026
 Self-Assessment – Jan 2023
 Single Point Vulnerabilities – Sept 2025
 Seismic PRA – Feb 2025
 Seismically Induced System Interactions – Mar 2024
 Software QA - Aug 2021
 Spent Fuel Management – Sep 2025 Dec 2025 #2
 System Engineering – Mar 2022
 Transformers, Large – May 2025
 Troubleshooting – Dec 2022
 Tsunami Hazard Analysis – Jan 2025
 Vibration Monitoring – July 2025