



**Pacific Gas and
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March 18, 2002

PG&E Letter DCL-02-028

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

ATTN: Mr. Samuel J. Collins
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
One White Flint North, Room 5 D2, Mail Stop O-5 E7
11555 Rockville Pike
Rockville, MD 20852-2738

Diablo Canyon Units 1 and 2
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Twenty-Day Answer to NRC Order for Interim Safeguards and Security
Compensatory Measures

Dear Mr. Collins:

This letter is in response to the NRC letter dated February 25, 2002, in which the U.S. Nuclear Regulatory Commission (NRC or Commission) issued an "Order" to Pacific Gas and Electric Company (PG&E) that modifies the current operating licenses for Diablo Canyon Power Plant (DCPP), Units 1 and 2. The Order was immediately effective and requires compliance with specific interim safeguards and security compensatory measures as stated in attachment 2 to the Order.

The Order requires an answer within twenty (20) days. Enclosure 1 to this letter is the 20-day answer for DCPP. Enclosure 2 (contains Safeguards Information) is a description of DCPP's compliance and the actions being taken to comply with each of the Interim Compensatory Measures specified in the Order, including a schedule for implementation.

Under a separate letter to the NRC's Mr. Samuel J. Collins, dated March 18, 2002, PG&E is requesting an extension to respond to three Interim Compensatory Measures: B.2.a(1), B.2.a(2), and B.2.b.

SAFEGUARDS INFORMATION

NOTICE: Enclosure 2 contains "Safeguards Information." Upon separation of Enclosure 2, this letter, including Enclosure 1 is "Decontrolled."

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance
Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

* See 11



Sincerely,

David H. Oatley
Vice President, Diablo Canyon Operations

LMP/A0550265

Enclosures

cc/enc: Ellis W. Merschoff, Region IV
Glenn M. Tracy, EDO
cc: David L. Proulx, Resident
Girija S. Shukla, NRR
Diablo Distribution

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20-Day Answer to Order

The NRC order of February 25, 2002, included the following reporting requirements:

III

- B. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, notify the Commission, (1) if they are unable to comply with any of the requirements described in Attachment 2, (2) if compliance with any of the requirements is unnecessary in their specific circumstances, or (3) if implementation of any of the requirements would cause the Licensee to be in violation of the provisions of any Commission regulation or the facility license. The notification shall provide the Licensees' justification for seeking relief from or variation of any specific requirement.
2. Any Licensee that considers that implementation of any of the requirements described in Attachment 2 to this Order would adversely impact safe operation of the facility must notify the Commission, within **twenty (20) days** of this Order, of the adverse safety impact, the basis for its determination that the requirement has an adverse safety impact, and either a proposal for achieving the same objectives specified in the Attachment 2 requirement in question, or a schedule for modifying the facility to address the adverse safety condition. If neither approach is appropriate, the Licensee must supplement its response to Condition B1 of this Order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B1.
- C. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, submit to the Commission, a schedule for achieving compliance with each requirement described in Attachment 2.
2. All Licensees shall report to the Commission, when they have achieved full compliance with the requirements described in Attachment 2.

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PG&E Answer:

The following answer applies to all the Interim Compensatory Measures in the Order, except for those for which PG&E is requesting an extension (see PG&E Letter to Mr. Samuel J. Collins, DCL-02-029, dated March 18, 2002).

- Item B1:** PG&E is able to comply with and will implement the requirements in Attachment 2 of the Order. A description of PG&E's understanding of each requirement and the means by which PG&E intends to implement each requirement is provided in Enclosure 2 to this letter. Implementation of these requirements will not cause PG&E to be in violation of the provisions of the applicable Commission regulations or the facility operating licenses.
- Item B2:** PG&E does not consider that the implementation of the requirements in Attachment 2 to the Order would adversely impact safe operation of DCP Units 1 and 2.
- Item C1:** The schedule for achieving compliance with the requirements of Attachment 2 to the Order is included in Enclosure 2 to this letter.
- Item C2:** PG&E will report to the Commission when full compliance with the requirements in Attachment 2 to the Order has been achieved.

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