



**Pacific Gas and
Electric Company**

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April 18, 2002

PG&E Letter No. DCL-02-042

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

Docket No. 72-26
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Submittal of Proposed Changes to the DCPD Physical Security Program to
Incorporate the Diablo Canyon ISFSI and Associated Request for Exemption to
Four 10 CFR 73.55 Requirements

Dear Commissioners and Staff:

On December 21, 2001, Pacific Gas and Electric Company (PG&E) submitted to the Nuclear Regulatory Commission (NRC) license amendment request (LAR) 01-09 to Facility Operating License Nos. DPR-80 and DPR-82 (PG&E Letter DCL-01-127) for Diablo Canyon Power Plant (DCPD) Units 1 and 2, respectively. The LAR proposed changes to the DCPD Physical Security Plan, the Safeguards Contingency Plan, and the Security Training and Qualification Plan to incorporate the security provisions applicable to the Diablo Canyon Independent Spent Fuel Storage Installation (ISFSI).

PG&E performed a 10 CFR 50.54(p) evaluation of proposed changes to the DCPD Physical Security Plan, the Safeguards Contingency Plan, and the Security Training and Qualification Plan. The changes incorporate the security provisions applicable to the Diablo Canyon ISFSI. The evaluation concluded that the proposed changes to the DCPD Physical Security Plan require NRC approval prior to implementation. Based on additional guidance from the NRC, PG&E is withdrawing LAR 01-09 and resubmitting the change as a change requiring prior NRC approval as specified by 10 CFR 50.54 (p). The enclosures identified below are identical to those submitted as part of LAR 01-09.

SECURITY SAFEGUARDS INFORMATION

[When separated from Enclosure 1, handle this document as non-safeguards]

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PG&E is submitting Enclosure 1, which contains the proposed changes to the DCPD Physical Security Plan, for NRC approval. The proposed change to the DCPD Physical Security Plan primarily consists of the addition of an Appendix J that separately describes the security requirements for the Diablo Canyon ISFSI. Enclosure 1 contains security safeguards information, and should be handled in accordance with 10 CFR 73.21.

Enclosure 1 also contains proposed changes to the Safeguards Contingency Plan and the Security Training and Qualification Plan. These proposed changes are minor and reflect the integrated addition of event responses and personnel tasks specific to the Diablo Canyon ISFSI. These changes do not change any of the plant security requirements, and do not decrease the effectiveness of plant security.

Enclosure 2 contains exemption requests from four 10 CFR 73.55 requirements. In accordance with 10 CFR 2.790(d), PG&E requests that enclosure 2 be withheld from public disclosure since it contains information related to DCPD security.

All changes will be incorporated into the physical security, safeguards contingency and security training and qualification plans following NRC approval of the Physical Security Plan changes. These changes will go into effect before movement of spent fuel out of the main DCPD Protected Area.

These proposed changes are submitted to the Document Control Desk, and a copy to the Region IV Office.

Should you require further information or clarification, please contact Ron Todaro, Manager, Security Services, at (805) 545-4309.

Sincerely,

Lawrence F. Womack
Vice President, Nuclear Services

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GWH

Enclosures

cc: Diablo Distribution
cc/enc. Steven L. Baggett
Ellis W. Merschoff
David L. Proulx
Girija S. Shukla

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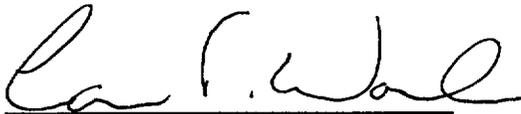
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

_____) Docket No. 50-275
In the Matter of) Facility Operating License
PACIFIC GAS AND ELECTRIC COMPANY) No. DPR-80
)
Diablo Canyon Power Plant) Docket No. 50-323
Units 1 and 2) Facility Operating License
_____) No. DPR-82

Docket No. 72-26

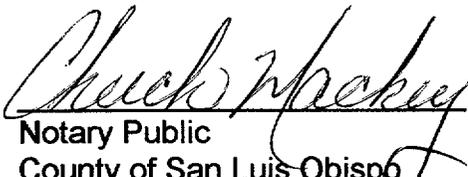
AFFIDAVIT

Lawrence F. Womack, of lawful age, first being duly sworn upon oath says that he is Vice President, Nuclear Services of Pacific Gas and Electric Company; that he has executed PG&E Letter DCL-02-042 (Submittal of Proposed Revisions to the DCPD Physical Security Program to Incorporate the Diablo Canyon ISFSI and Associated Request for Exemption to Four 10 CFR 73.55 Requirements) on behalf of said company with full power and authority to do so; that he is familiar with the content thereof; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.

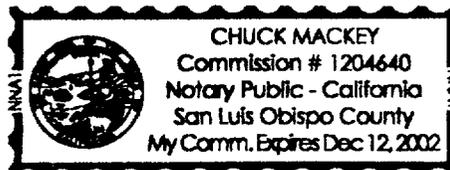


Lawrence F. Womack
Vice President, Nuclear Services

Subscribed and sworn to before me this 18th day of April 2002.



Notary Public
County of San Luis Obispo
State of California



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