



**Pacific Gas and
Electric Company**

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December 23, 2003

PG&E Letter DCL-03-179

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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Response to NRC Request for Additional Information Regarding License
Amendment Request 03-06, "Revision to Technical Specification 3.8.1,
'AC Sources - Operating'"

Dear Commissioners and Staff:

Pacific Gas and Electric (PG&E) Letter DCL-03-060, dated May 29, 2003, submitted License Amendment Request (LAR) 03-06, "Revision to Technical Specification 3.8.1, 'AC Sources - Operating,'" which would extend the completion time for restoring an inoperable diesel generator from 7 days to 14 days.

On August 25, 2003, the NRC staff requested additional information required to complete their review of LAR 03-06. PG&E's response was submitted in PG&E Letter DCL-03-142 dated November 5, 2003. On November 7, 2003, the NRC staff issued a second request for additional information. PG&E's response is provided in Enclosure 1.

This additional information does not affect the results of the technical evaluation and no significant hazards consideration determination previously transmitted in PG&E Letter DCL-03-060.

If you have any questions or require additional information, please contact Stan Ketelsen at (805) 545-4720.

Sincerely,

David H. Oatley

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Enclosures

cc: Edgar Bailey, DHS
Bruce S. Mallett
David L. Proulx
Diablo Distribution
cc/enc: Girija S. Shukla

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

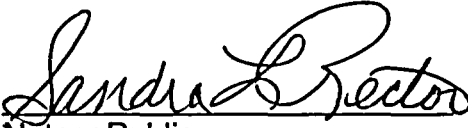
In the Matter of PACIFIC GAS AND ELECTRIC COMPANY)	Docket No. 50-275 Facility Operating License No. DPR-80
Diablo Canyon Power Plant Units 1 and 2)	Docket No. 50-323 Facility Operating License No. DPR-82

AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath states that he is Vice President and General Manager - Diablo Canyon of Pacific Gas and Electric Company; that he has executed this supplement to License Amendment Request 03-06 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.


 David H. Oatley
 Vice President and General Manager - Diablo Canyon

Subscribed and sworn to before me this 23rd day of December 2003.


 Notary Public
 County of San Luis Obispo
 State of California



PG&E Response to NRC Request for Additional Information Regarding License Amendment Request 03-06, "Revision to Technical Specification 3.8.1, 'AC Sources - Operating'"

NRC Request

Provide a list of the compensatory measures that will be implemented during the diesel generator (DG) 14-day (extended) Completion Time requested by License Amendment Request (LAR) 03-06.

PG&E Response

Pacific Gas and Electric Company (PG&E) will establish the following compensatory measures when a DG is removed from service for planned on-line maintenance utilizing the 14-day (extended) Completion Time proposed by PG&E Letter DCL-03-060, dated May 29, 2003, which submitted LAR 03-06, "Revision to Technical Specification 3.8.1, 'AC Sources - Operating.'"

Offsite Power Assurance

- Maintain periodic communications with the Diablo Canyon Power Plant (DCPP) Switching Center and Transmission Operations during the project to ensure no elective maintenance or testing on the offsite power sources is performed.

External Risk Consideration

- Provide assurance that storms or ocean swell events are not expected during the maintenance period.
- Contact the DCPP Switching Center to verify offsite power sources are not in danger of being lost due to wild land fires, other grid related transients, or scheduled work activities.
- Assure that Operations, Maintenance, Engineering, and the Manager of Operations are notified in the event of external events that may jeopardize offsite power sources, and that they determine if postponement of DG maintenance is warranted.

Internal Risk Consideration

- Avoid scheduling site activities that may cause a plant transient on either unit. Exceptions should be authorized in accordance with DCPP Administrative Procedure AD7.DC6, "On-Line Maintenance Risk Management." (AD7.DC6 provides guidance for managing plant trip, probabilistic, and safety function degradation risk from on-line maintenance, and external and internal conditions, as required by 10 CFR 50.65(a)(4)).
- Avoid performing any testing or elective maintenance on either unit unless it is identified on the approved work week schedule. Exceptions may be approved by the Shift Manager or Work Week Manager.

Minimize Duration

- Clearly identify and obtain agreement on the maintenance scope before starting. No additions will be made without Engineering and Operations review, including their impact on post-maintenance test requirements.
- Verify all parts and equipment necessary for the project have been procured and meet quality related checks.
- Support the DG maintenance project on a 24-hour a day schedule.

Management Oversight

- Provide on-shift senior management support in the event conditions develop that jeopardize plant operation (such as wild land fires, high swell warnings, or electrical distribution problems).
- Assign engineering and operations to perform an evaluation in the event project conditions change such that it no longer meets the initial condition requirements or project restrictions, with a determination to be made by the Manager of Operations as to the proper course of action.

Protect Other Mitigation Equipment

- Post caution signs on the affected unit's doors to the following rooms requiring shift foreman permission to perform work within:
 - motor-driven and turbine-driven auxiliary feedwater pump rooms
 - other two DG rooms
- Verify the other two DGs are operable.
- Perform a walkdown verifying the other two DGs and associated areas are clean and in good material condition with no activities being performed which could jeopardize operation.
- Verify redundant safety related systems, subsystems, trains, components and devices dependant on the other two DGs are operable within 24 hours of beginning maintenance.
- Perform no elective maintenance or testing on components required to crosstie the vital 4 kV busses between units as required by DCPD emergency operating procedures.
- Perform no elective maintenance or testing (other than normally scheduled surveillances) on either units' DGs.
- Verify all DG fuel oil transfer system surveillance testing is current for the duration of the project.

Contingency Planning

- Place the affected unit's redundant equipment (4 kV and 480 V) in service or on alternate power supplies.
- Conduct operator briefings on applicable normal, abnormal and emergency procedures for reactor trip, loss of electrical power, and restoring electrical power, each shift for the duration of maintenance.