



**Pacific Gas and
Electric Company**

James R. Becker
Vice President - Diablo Canyon
Operations and Station Director

Diablo Canyon Power Plant
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May 28, 2004

PG&E Letter DCL-2004-545

Mr. Roger Briggs, Executive Officer
California Regional Water Quality Control Board (CCRWQCB)
Central Coast Region
895 Aerovista, Suite 101
San Luis Obispo, CA 93401-7906

Certified/Return Receipt
7003-3110-0005-7002-8117

Attention: Mr. Michael Thomas

Dear Mr. Briggs:

Information Regarding adding Titanium Dioxide to Steam Generators at
Diablo Canyon Power Plant (DCPP) - NPDES Permit No. CA0003751

After the current refueling outage that began in March (Unit 1), and the planned outage in October (Unit 2) 2004, DCPP will begin adding small amounts of titanium dioxide (powder) to steam generator feedwater that is intended to act as a corrosion inhibitor on the clean metal surfaces of the steam generators. Based on Electric Power Research Institute (EPRI) guidelines, the additions are proposed at an amount and frequency of approximately 2.2 pounds every week or two as necessary.

The titanium dioxide is intended to stay in the steam generators, however, trace amounts may potentially be present in steam generator blowdown, which discharges through NPDES designated flowpaths. Titanium dioxide, if present in steam generator blowdown, is calculated at worst-case to be less than 0.01 ug/l at NPDES Discharge 001 Outfall, significantly less than the concentration in typical seawater at 1.0 ug/l (CRC Handbook 14-17 83rd ed.). Because of the worst-case very low concentrations of titanium dioxide expected, discharge of titanium would not cause an issue with toxicity based on data from routine quarterly NPDES required chronic toxicity bioassays that contain naturally occurring titanium at seawater concentrations. Specific worst-case representative samples to perform chronic toxicity bioassays that would provide meaningful results cannot be prepared because of the insoluble nature of the material and the very low concentration.

It is estimated that at maximum blowdown flow and minimum circulating cooling water (only one circulating water pump operating) the No Observable Effects Concentration (NOEC) would be achieved with substantial margin if titanium dioxide were discharged from NPDES Discharge 001 - Once Through Cooling Water - Outfall.

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Effluent from the addition of titanium dioxide will not "significantly change the nature or increase the quantity of pollutants not controlled by effluent limitations" (Standard Provisions C.7.) at DCP.

Should you have any questions, please contact Rick Hernandez of my staff at 545-4662 if you have any questions.

Sincerely,



James R. Becker
Vice President – Diablo Canyon Operations and Station Director

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Enclosure

cc: Michael Thomas, CCRWQCB
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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

David L. Proulx
NRC, Senior Resident Inspector 104/5/544
DCPP