



**Pacific Gas and
Electric Company®**

James R. Becker
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August 5, 2005

PG&E Letter DCL-05-092

U.S. Nuclear Regulatory Commission
Document Control Desk
ATTN: Director, Office of Nuclear Regulatory Regulation
Washington, D.C. 20555

Diablo Canyon Units 1 and 2
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Twenty-Day Response to NRC Order Imposing Additional Security Measures On the
Transportation of Radioactive Material Quantities of Concern (EA-05-007)

Dear Commissioners and Staff:

On July 19, 2005, the Nuclear Regulatory Commission (NRC) transmitted an order entitled: "Order Imposing Additional Security Measures (Effective Immediately)" (EA-05-007) (referred herein as the Order), to Pacific Gas & Electric Company (PG&E), Diablo Canyon Power Plant (DCPP). The Order states that, as a result of its initial consideration of current safeguards and security requirements, as well as a review of information provided by the intelligence community, the NRC has determined that certain security measures are required to be implemented by licensees as prudent, interim measures to address the current threat environment in a consistent manner. The Order requires compliance with specific additional security measures as set forth in Attachment B of the Order, which supplement existing regulatory requirements to enhance the security for transporting radioactive material quantities of concern. These additional security measures are to remain in effect until the NRC determines otherwise. The NRC recognizes that licensees may have already initiated many of the measures set forth in Attachment B to the Order in response to previously issued Safeguards and Threat Advisories.

Even though the NRC found that the security measures implemented by licensees in response to the Safeguards and Threat Advisories have been adequate to provide reasonable assurance of adequate protection of common defense and security, in light of the continuing threat environment, they concluded the security measures must be embodied in an order consistent with the established regulatory framework. In addition, pursuant to 10 CFR 2.202, the NRC concluded that the public health and safety required that the Order be immediately effective.

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The attached enclosure provides PG&E DCP's twenty-day response to the Order. Pursuant to 10 CFR 2.202(d), PG&E DCP consents to the Order and is not requesting a hearing.

This response is hereby submitted to the NRC in accordance with 10 CFR 50.4 and 10 CFR 2.202. If you have any questions, please contact Stan Ketelsen at (805) 545-4720.

Sincerely,

A handwritten signature in black ink, appearing to read 'James R. Becker', written over a horizontal line.

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

swh/A0642696

Enclosure

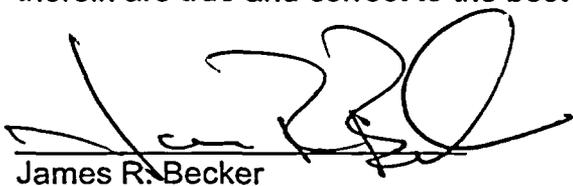
cc: Terry W. Jackson, Resident
Bruce S. Mallett, Region IV
Girija S. Shukla, NRR
Diablo Distribution

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

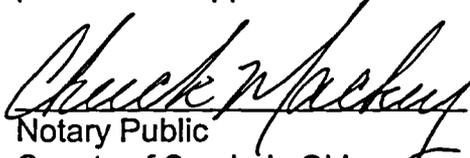
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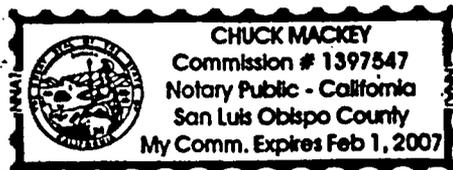
I, James R. Becker, being of lawful age, first being duly sworn upon oath say that I am Vice President – Diablo Canyon Operations and Station Director of Pacific Gas and Electric Company; that I have executed this “Twenty-Day Response to NRC Order Imposing Additional Security Measures on the Transportation of Radioactive Material Quantities of Concern (EA-05-007),” on behalf of said company with full power and authority to do so; that I am familiar with the content thereof; and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.



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

Subscribed and sworn to before me this 5th day of August 2005, by James R. Becker, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me.


Notary Public
County of San Luis Obispo
State of California



**Twenty-Day Response to NRC Order for
Additional Security Measures on the Transportation of Radioactive Material of
Quantities Concern**

The Order requires responses to the following conditions:

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 B, (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 also provide 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 B to this Order would adversely impact safe operation of the facility must notify the Commission, within twenty (20) days of the date 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 B 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 B.1 of this Order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B.1.**
- C. All Licensees shall report to the Commission when they have achieved full compliance with the requirements described in Attachment B.**

**Twenty-Day Response to NRC Order for
Additional Security Measures on the Transportation of Radioactive Material of
Quantities Concern**

PG&E DCPD Response:

- B. 1. PG&E DCPD (1) can and will comply with the requirements described in Attachment B of the Order, (2) knows of no specific circumstances where this order would be unnecessary at DCPD, and (3) knows of no specific circumstances where implementation of the requirements of this order would cause PG&E DCPD to be in violation of the provisions of any Commission regulation or the facility license.
- 2. Implementation of the requirements described in Attachment B to the Order would not adversely impact safe operation of PG&E DCPD.
- C. PG&E DCPD will report to the Commission when full compliance with the requirements in Attachment B to the Order has been achieved.