



**Pacific Gas and  
Electric Company**

**David H. Oatley**  
Vice President and  
General Manager

Diablo Canyon Power Plant  
P.O. Box 56  
Avila Beach, CA 93424

805.545.4350  
Fax: 805.545.4234

September 22, 2005

PG&E Letter DCL-05-111

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  
Withdrawal of Request for Approval of Extreme Growth Method

Dear Commissioners and Staff:

Pacific Gas and Electric Company (PG&E) Letter DCL-04-028, dated March 18, 2004, submitted License Amendment Request (LAR) 04-01, "Revised Steam Generator Voltage-based Repair Criteria Probability of Detection Method for DCPD Units 1 and 2." LAR 04-01 requested approval to use the probability of prior cycle detection (POPCD) method on a permanent basis for all remaining cycles for Diablo Canyon Power Plant (DCPP) Units 1 and 2 until steam generator replacement. In DCL-04-028, PG&E stated that upon NRC approval to use the POPCD method, PG&E would adopt the Electric Power Research Institute (EPRI) outlier (extreme) growth method for application coincident with the use of the POPCD method.

Subsequently, in PG&E Letter DCL-04-117, dated September 17, 2004, "Response to August 24, 2004, NRC Request for Additional Information Regarding License Amendment Request 04-01, 'Revised Steam Generator Voltage-based Repair Criteria Probability of Detection Method for DCPD Units 1 and 2,'" PG&E stated that it did not need approval of the EPRI extreme growth method for Unit 2 Cycle 13 based on the NRC's acceptance of PG&E's exclusion criteria for the extreme growth rate observed in Unit 2 Refueling Outage No. 11, and the extreme growth method could be approved at a later time.

On October 28, 2004, the NRC issued License Amendments 177 (Unit 1) and 179 (Unit 2), approving LAR 04-01, without completing its review of the extreme growth method as submitted in LAR 04-01.

PG&E has determined that extreme growth at DCPD has a very low probability of occurrence, largely due to increased Plus Point inspections and conservative preventive plugging criteria. Therefore, PG&E withdraws its request for NRC approval of the extreme growth method as submitted in LAR 04-01.

A001



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

Sincerely,

A handwritten signature in black ink, appearing to read 'D. H. Oatley'.

David H. Oatley  
*Vice President and General Manager*

jer1/3664

cc: Edgar Bailey, DHS  
Terry W. Jackson  
Bruce S. Mallett  
Girija S. Shukla  
Diablo Distribution