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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

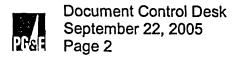
Dear Commissioners and Staff:

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 DCPP 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 DCPP 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 DCPP 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.



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

Sincerely,

David H. Oatley

Vice President and General Manager

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