



**Pacific Gas and  
Electric Company®**

**John T. Conway**  
Senior Vice President &  
Chief Nuclear Officer

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

805.545.3333  
Fax: 805.545.6445

June 26, 2008

PG&E Letter DIL-08-004

ATTN: Document Control Desk  
Director, Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Materials License No. SNM-2511, Docket No. 72-26  
Diablo Canyon Independent Spent Fuel Storage Installation  
Final Safety Analysis Report Update, Revision 2

Dear Commissioners and Staff:

By letter dated March 22, 2004, the Nuclear Regulatory Commission (NRC) issued Materials License No. SNM-2511 authorizing Pacific Gas and Electric Company (PG&E) to receive, possess, store, and transfer spent fuel and associated radioactive materials resulting from the operation of Diablo Canyon Power Plant in the Diablo Canyon Independent Spent Fuel Storage Installation (ISFSI).

By PG&E Letter DIL-06-001, dated March 22, 2006, PG&E submitted the Diablo Canyon ISFSI Final Safety Analysis Report (FSAR) Update, Revision 1.

Pursuant to the provisions of 10 CFR 72.7, by PG&E Letter DIL-08-001, dated January 22, 2008, PG&E requested a one-time exemption from the provisions of 10 CFR 72.70(c)(6) to delay submittal of the Diablo Canyon ISFSI FSAR Update, Revision 2. Code of Federal Regulations 10 CFR 72.70(c)(6) requires updates to the ISFSI FSAR to be filed with the NRC every 24 months from the date of the issuance of the license. By letter dated March 21, 2008, the NRC granted this exemption, stating that the exemption to delay submittal of the ISFSI FSAR did not pose an increased risk to public health and safety, because the exemption is administrative in nature and solely relates to document filing requirements. The exemption allows PG&E to submit the Diablo Canyon ISFSI FSAR, Revision 2, no later than July 1, 2008, or 30 days prior to the commencement of onsite dry-run testing activities, whichever occurs first.

Pursuant to 10 CFR 72.70(a)(1) and in accordance with 10 CFR 72.4, PG&E is enclosing a CD-ROM of the Diablo Canyon ISFSI FSAR Update, Revision 2. Revision 2 includes changes to the ISFSI FSAR Update since the last submittal. The changes incorporated were evaluated in accordance with 10 CFR 72.48 and a determination was made that prior NRC approval was not required.

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The following is a brief description of the more significant changes included in Revision 2:

- (1) The Holtec International (HI)-TRAC 125D transfer cask and Multiple Purpose Canister (MPC)-32 are now only handled in the vertical orientation during all ISFSI loading and unloading operations by the cask transporter, low profile transporter (LPT) and the fuel handling building/auxiliary building (FHB/AB) crane.
- (2) Reduced the height of the HI-TRAC 125D transfer cask and MPC-32 by approximately 9 inches, permitting the transfer cask to be handled in the vertical orientation during all operations inside and outside of the FHB/AB.
- (3) Replaced the cask transport frame and dolly system with the LPT.
- (4) Removed the lift jack system from the cask transfer facility (CTF); all lifting activities at the CTF will be performed by the cask transporter.
- (5) The Unit 2 cask washdown area will be utilized for Units 1 and 2.
- (6) The mating device tongue plate rack and pinion drive have been replaced with a hydraulic drive system.
- (7) The HI-STORM 100SA overpack generic HI-STORM 100S lid has been replaced with the HI-STORM 100S Version B lid.

A total of one CD-ROM is included in this submission. The CD-ROM is labeled: "Diablo Canyon Independent Spent Fuel Storage Installation Final Safety Analysis Report Update, Revision 2, June 2008." The contents are in Adobe Acrobat Portable Document Format. The CD-ROM contains the following publicly available Diablo Canyon ISFSI FSAR Update files.

| <u>Filename</u>                              | <u>File Size</u> |
|--|------------------|
| 001.DC ISFSI UFSAR, R2 (Except 2.6 Figs)     | 10.4 MB          |
| 002 DC ISFSI UFSAR R2 FIGS. 2.6-1 TO 2.6-12  | 47.1 MB          |
| 003 DC ISFSI UFSAR R2 FIGS. 2.6-13 TO 2.6-23 | 44.9 MB          |
| 004 DC ISFSI UFSAR R2 FIGS. 2.6-24 TO 2.6-27 | 38.4 MB          |
| 005 DC ISFSI UFSAR R2 FIGS. 2.6-28 TO 2.6-61 | 43.9 MB          |

If you have any questions regarding this submittal, please contact Mr. Terence Grebel at (805) 545-4160.



I declare under penalty of perjury that the foregoing is true and correct.  
Executed on June 26, 2008.

Sincerely,

John T. Conway  
*Senior Vice President & Chief Nuclear Officer*

Enclosures

cc: Diablo Distribution  
cc/enc: James R. Hall, Senior Project Manager, Division of Spent Fuel Storage  
and Transportation  
Ray L. Kellar, NRC Region IV Inspector  
Michael S. Peck, DCPN NRC Senior Resident Inspector