



**Pacific Gas and  
Electric Company®**

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per PM*

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PG&E Letter DCL-09 -051

10 CFR 170.11

U.S. Nuclear Regulatory Commission  
ATTN: Chief Financial Officer  
Washington, D.C. 20555-0001

Diablo Canyon Units 1 and 2  
Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Request to be Considered Pilot Plant for Digital Instrumentation and Controls Interim  
Staff Guidance, DI&C-ISG-06, "Task Working Group #6: Licensing Process"

Dear Commissioners and Staff:

The NRC and the Nuclear Energy Institute (NEI) have developed interim staff guidance (ISG) on the licensing of digital instrumentation and control (DI&C) safety systems for operating nuclear plants contained in Digital Instrumentation and Controls Interim Staff Guidance, DI&C-ISG-06, "Task Working Group #6: Licensing Process." DI&C-ISG-06 provides the licensing process to be used by the NRC in the review of digital I&C systems, and provides guidance to licensees on the content of the associated License Amendment Request (LAR).

Pacific Gas & Electric Company (PG&E) intends to submit an LAR for a digital upgrade of the Diablo Canyon Power Plant (DCPP) reactor trip system and engineered safety features actuation system, and requests NRC consideration of DCPP as a pilot plant for the use of DI&C-ISG-06. In support of further development and improvements of DI&C-ISG-06, PG&E will work with the NRC and NEI to develop the LAR consistent with the guidance provided in DI&C-ISG-06.

Also, in accordance with 10 CFR 170.11(b)(1), PG&E requests a waiver of fees associated with the NRC review of the LAR for the digital upgrade of the DCPP reactor protection system and engineered safety features actuation system. The NRC review of the LAR developed based on the guidance provided in DI&C-ISG-06 will support future improvements to DI&C-ISG-06 based on a pilot plant application.

PG&E currently intends to submit the LAR by April 30, 2010.

This communication contains no new or revised commitments.

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

Sincerely,

James R. Becker  
Site Vice President

kjse/4328

cc: Gordon Clefton, Senior Project Manager, Nuclear Energy Institute  
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