



October 8, 2010

PG&E Letter DCL-10-129

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20852

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2

Response to NRC Letter dated September 15, 2010, Summary of Telephone
Conference Call Held on August 18, 2010, Between the U.S. Nuclear Regulatory
Commission and Pacific Gas and Electric Company Concerning Responses to
Requests for Additional Information Related to the Diablo Canyon Nuclear Power
Plant, Units 1 and 2, License Renewal Application

Dear Commissioners and Staff:

By letter dated November 23, 2009 (Reference 1), Pacific Gas and Electric Company (PG&E) submitted an application to the U.S. Nuclear Regulatory Commission (NRC) for the renewal of Facility Operating Licenses DPR-80 and DPR-82, for Diablo Canyon Power Plant (DCPP) Units 1 and 2, respectively. The application included the license renewal application (LRA), and Applicant's Environmental Report – Operating License Renewal Stage.

By letter dated September 15, 2010, the NRC staff sent a summary of a telephone conference between the NRC and representatives of PG&E held on August 18, 2010, to obtain clarification on the applicant's response to request for additional information (RAI) submitted to the NRC in a letter dated July 7, 2010, regarding structures aging management programs. The telephone conference call was useful in clarifying the intent of PG&E's response.

PG&E's supplemental information to the RAI response for which the staff requested clarification is provided in Enclosure 1. Other follow-up RAIs, determined by the NRC staff to be necessary, will be issued separately by a formal letter.

PG&E has identified additional changes that are required in the LRA submitted in Reference 1. LRA Amendment 18 is included in Enclosure 2 showing the changed pages with line-in/line-out annotations.

PG&E makes a commitment in revised LRA Table A4-1, License Renewal Commitments, shown in Enclosure 2.



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If you have any questions regarding this response, please contact
Mr. Terence L. Grebel, License Renewal Project Manager, at (805) 545-4160.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 8, 2010.

Sincerely,

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

James R. Becker

TLG/50343158

Enclosure

cc: Diablo Distribution

cc/enc: Elmo E. Collins, NRC Region IV Regional Administrator

Nathanial Ferrer, NRC Project Manager, License Renewal

Kimberly J. Green, NRC Project Manager, License Renewal

Fred Lyon, NRC Project Manager, Office of Nuclear Reactor Regulation

Michael S. Peck, NRC Senior Resident Inspector

**PG&E Response to NRC Letter dated September 15, 2010,
Summary of Telephone Conference Call Held on August 18, 2010,
Concerning Responses to Requests for Additional Information (Set 4)
Related to the Diablo Canyon License Renewal Application**

RAI B2.1.16-2

In its July 7, 2010, response to request for additional information (RAI) 82.1.16-2, the applicant described the details of the One-Time Inspection Program inspection techniques. However, the staff was not clear if the scope of the program has been defined to include eddy current testing of heat exchanger tubes in an environment comparable to the non-regenerative heat exchangers.

Discussion:

Pacific Gas & Electric Company agreed to supplement the response to RAI 82.1.16-2.

PG&E Response to RAI B2.1.6-2

Diablo Canyon Power Plant (DCPP) Units 1 and 2, has a population of four heat exchangers, two non-regenerative and two regenerative, with austenitic tubing continuously exposed to borated water at temperatures greater than 140 degrees F within the scope of the One-Time Inspection Program. DCPP will perform 100 percent eddy current testing of one nonregenerative heat exchanger as part of the One-Time Inspection Program within ten years prior to the period of extended operation.

See revised License Renewal Application Table A4-1 in Enclosure 2.

LRA Amendment 18

| LRA Section | RAI |
|--------------------|------------|
| Table A4-1 | B2.1.16-2 |

Table A4-1 License Renewal Commitments

| Item # | Commitment | LRA Section | Implementation Schedule |
|--------|--|----------------|--|
| 48 | <i>DCPP will perform 100 percent eddy current testing of one nonregenerative heat exchanger as part of the One-Time Inspection Program within ten years prior to the period of extended operation.</i> | <i>B2.1.16</i> | <i>Prior to the period of extended operation</i> |