



**Pacific Gas and  
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December 13, 2010

PG&E Letter DCL-10-162

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 Draft Request for Additional Information (Draft Set 34), dated  
November 10, 2010, for the Diablo Canyon 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 draft request for additional information dated November 10, 2010, the NRC staff requested additional information needed to continue their review of the DCPP LRA. On November 18, 2010 a telephone conference between the NRC and representatives of PG&E was held to obtain clarification on PG&E's response to the request for additional information (RAI) submitted to the NRC in PG&E Letter DCL-10-126, dated September 30, 2010, regarding the Structures Monitoring Aging Management Program.

PG&E's supplemental information to the RAI response for which the staff requested information is provided in Enclosure 1. PG&E revises a commitment in amended LRA Table A4-1, License Renewal Commitments, shown in Enclosure 2. LRA Amendment 32 is included in Enclosure 2 showing the changed pages with line-in/line-out annotations.

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 December 13, 2010.

Sincerely,

James R. Becker  
*Site Vice President*

TLG/50365158

Enclosures

cc: Diablo Distribution

cc/enc: Elmo E. Collins, NRC Region IV Regional Administrator  
Nathanial B. Ferrer, NRC Project Manager, License Renewal  
Kimberly J. Green, NRC Project Manager, License Renewal  
Michael S. Peck, NRC Senior Resident Inspector  
Alan B. Wang, NRR Project Manager

Diablo Canyon Nuclear Power Plant, Units 1 and 2 (DCPP)  
License Renewal Application (LRA)  
Draft Request for Additional Information (RAI) Set 34  
Aging Management Programs

**D-RAI B2.1.32-1 (follow-up)**

**Background:**

*By letter dated September 30, 2010, the applicant responded to follow-up RAI B2.1.32-1 regarding the Structures Monitoring Program acceptance criteria. In the response, the applicant stated that prior to the period of extended operation, the acceptance criteria for concrete structural elements for safety-related structures will be revised to incorporate the quantitative evaluation criteria provided in ACI 349.3R.*

**Issue:**

*The qualitative acceptance criteria should apply to all concrete elements within the scope of the Structures Monitoring Program; however, the applicant's response only addresses safety-related structures. In addition, the response makes no mention of conducting a baseline inspection with qualitative acceptance criteria. In order to properly monitor and trend structural degradation during the period of extended operation, a baseline inspection in accordance with ACI 349.3R acceptance criteria, must be completed prior to the period of extended operation.*

**Request:**

- 1) Update the acceptance criteria for all in-scope concrete elements or justify why it is not needed.*
- 2) Provide plans and a schedule to conduct a baseline inspection in accordance with the ACI 349.3R acceptance criteria prior to the period of extended operation, or justify why a baseline inspection is not needed.*

**PG&E Response to D-RAI B2.1.32-1 (follow-up)**

- 1) By Pacific Gas and Electric Company (PG&E) Letter DCL-10-126, dated September 30, 2010, PG&E responded to follow-up RAI B2.1.32-1 regarding the Structures Monitoring Program acceptance criteria. In the response, PG&E stated that prior to the period of extended operation, the acceptance criteria for concrete structural elements for safety-related structures will be revised to incorporate the quantitative evaluation criteria provided in American Concrete Institute (ACI ) 349.3R.

In response to RAI B2.1.32-1 (follow-up), prior to the period of extended operation, the acceptance criteria for concrete structural elements provided in the implementing procedures for the Structures Monitoring Program for both safety and non-safety related structures, will be revised to incorporate the quantitative

evaluation criteria provided in ACI 349.3R, Evaluation of Existing Nuclear Safety Related Concrete Structures, Chapter 5, Evaluation Criteria. See amended LRA Table A4-1 in Enclosure 2.

- 2) PG&E will conduct a baseline inspection of all safety and non-safety related structures' concrete elements (in the scope of the Structures Monitoring Program) in accordance to ACI 349.3R acceptance criteria prior to entering the period of extended operation. See amended LRA Table A4-1 in Enclosure 2.

**LRA Amendment 32**

<b>LRA Section</b>	<b>RAI</b>
Table A4-1	D-RAI B2.1.32-1 (follow-up)

Table A4-1 License Renewal Commitments

Item #	Commitment	LRA Section	Implementation Schedule
43	<p>Prior to the period of extended operation, the acceptance criteria for concrete structural elements provided in the implementing procedures for the Structures Monitoring Program for <i>both safety and non-safety</i> related structures, will be revised to incorporate the quantitative evaluation criteria provided in ACI 349.3R, Evaluation of Existing Nuclear Safety Related Concrete Structures, Chapter 5, Evaluation Criteria.</p>	B2.1.32	Prior to the period of extended operation
55	<p><i>PG&amp;E will conduct a baseline inspection of all safety and non-safety related structure's concrete elements (in the scope of the Structures Monitoring Program) in accordance to ACI 349.3R acceptance criteria prior to entering the period of extended operation.</i></p>	B2.1.32	<i>Prior to the period of extended operation</i>