



**Pacific Gas and  
Electric Company®**

**James R. Becker**  
Site Vice President

Diablo Canyon Power Plant  
Mail Code 104/5/601  
P. O. Box 56  
Avila Beach, CA 93424

805.545.3462  
Internal: 691.3462  
Fax: 805.545.6445

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PG&E Letter DCL-10-166

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

Response to Telephone Conference Call Held on December 8, 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, 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.

On December 8, 2010, a telephone conference call between the NRC and representatives of PG&E was held to obtain clarification on PG&E's response to a request for additional information (RAI), which was submitted to the NRC in PG&E Letter DCL-10-148, dated November 24, 2010, regarding RAI D-RAI B2.1.26-3.

PG&E's supplemental information to the RAI response for which the staff requested information is provided in Enclosure 1. PG&E revises its response in PG&E Letter DCL-10-148 to perform testing of the in-scope 480V and higher power cables at a frequency of at least every 6 years. See amended LRA Table A4-1, License Renewal Commitments, provided in Enclosure 2. LRA Amendment 33 is included in Enclosure 2.

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 January 7, 2011.

Sincerely,

James R. Becker  
*Site Vice President*

TLG/5454160

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

**Pacific Gas and Electric (PG&E) Supplement to Telephone Conference Call Held on December 8, 2010, Concerning Response to Request for Additional Information (RAI) Submitted to the NRC in a Letter Dated November 24, 2010, Regarding RAI D-RAI B2.1.26-3**

The Diablo Canyon Power Plant does not have any in-scope circuits whose power supply voltage is in the range from 400V to 480V. All in-scope 480V and higher power circuits routed through underground conduit are included in the pull box inspection program and will be included in the cable testing program. PG&E Letter DCL-10-148, dated November 24, 2010, indicated that insulation testing of in scope 480V and higher cables would be tested at least once every 10 years. In-scope 480V and higher power cables will be tested at a frequency of at least every 6 years with the first test completed prior to entering the period of extended operation. See amended LRA Table A4-1 in Enclosure 2.

The in-scope electrical pull boxes between the intake structure and turbine building are designed with drain conduits that drain to pull boxes at the intake and turbine building. The end pull boxes drain to a building sump or to an in-ground drain sump, which is separate from the pull boxes. The in-ground drain sump has an automatic sump pump and high level alarm, which provides indication of pump failure before the sump backs up into pull boxes. The sump pump and alarm features are tested annually in accordance with the plant maintenance work orders. The remaining in-scope electrical pull boxes are located in doors and are not subject to weather related water intrusion. Some of the indoor pull boxes are also equipped with drain conduits that drain to a building sump.

As indicated in PG&E Letter DCL-10-148, the pull box inspection program has been effective in preventing pull box flooding and cable submergence in all in-scope pull boxes. The pull box sump pump and alarm features are tested annually in accordance with the plant maintenance work orders. Pull box inspections are currently being performed bi-monthly in accordance with plant maintenance work orders. The inspections monitor water accumulation during rainy periods. The inspections can be deferred if no rain has fallen since the last inspection. These inspections have demonstrated that event-driven water accumulation from natural sources has not been occurring. Therefore, event-driven inspections are not required. Recent structural pull box inspections have not identified any visible indication of significant cable or cable support degradation. The pull box inspection frequency is subject to change based on inspection results. However, the program will require that in-scope cable pull boxes will be inspected for water accumulation at least once every year.

LRA Section B2.1.26 indicates that as an enhancement, procedures will be implemented for cable testing and periodic inspections of the pull boxes for in-scope medium voltage cables. PG&E revises this procedural commitment as follows. Procedures will be implemented for cable testing and periodic inspections of the pull

boxes for in-scope 480V and higher power cables. These procedures will also include pull box sump pump box and alarm features testing on an annual basis. See amended LRA Table A4-1 in Enclosure 2.

**LRA Amendment 33**

<b>LRA Section</b>
Table A4-1

Table A4-1 License Renewal Commitments

Item #	Commitment	LRA Section	Implementation Schedule
56	<p><i>Procedures will be implemented for:</i></p> <ul style="list-style-type: none"> <li><i>A. Cable testing and periodic water accumulation inspections of the pull boxes for in-scope 480V and higher power cables.</i></li> <li><i>B. Pull box sump pump box and alarm features testing on an annual basis.</i></li> </ul>	<i>B2.1.26</i>	<i>Prior to the period of extended operation</i>
57	<i>In-scope 480V and higher power cables will be tested at a frequency of at least every 6 years with the first test completed prior to entering the period of extended operation.</i>	<i>B2.1.26</i>	<i>Prior to the period of extended operation</i>