



March 25, 2011

PG&E Letter DCL-11-036

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  
Update Regarding the Intake Structure and Discharge Conduits Inspections

Dear Commissioners and Staff:

By Pacific Gas and Electric Company (PG&E) Letter DCL-09-079, "License Renewal Application," dated November 23, 2009, PG&E submitted an application to the U.S. Nuclear Regulatory Commission 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 Applicant's Environmental Report – Operating License Renewal Stage.

PG&E Letter DCL-10-126, "Response to NRC Letter dated September 1, 2010, Request for Additional Information (Set 22) for the Diablo Canyon License Renewal Application," dated September 30, 2010, indicated that marine growth will be removed in all accessible areas of the discharge conduits during 2R16 (2011) and 1R17 (2012). The requirements for future inspections, including those to be performed during the period of extended operation, will be developed based on the finding from the 2R16/1R17 inspections. These requirements will address the following: (1) inspection interval (not to exceed 5 years); (2) extent and frequency of marine growth removal; and (3) inspection extent (100 percent vs. sampling).

PG&E has revised its schedule for removing marine growth in all accessible areas of the Unit 2 discharge conduit. During 2R16, PG&E plans to use a new alternate methodology and equipment on a portion of the accessible areas of the Unit 2 discharge conduit to validate and streamline the tunnel surface cleaning. Marine growth removal and subsequent inspection of all required areas of the Unit 1 and Unit 2 discharge conduits will be completed prior to the period of extended operation. The Unit 2 discharge conduit is currently scheduled to be completed during 2R17 (2013). The Unit 1 discharge conduit is currently scheduled to be completed during 1R17 (2012). The requirements for future inspections, including those to be performed during the period of extended operation, will be developed based on the findings from the 1R17/2R17 inspections. These requirements will address the following: (1) inspection interval (not to exceed 5 years); (2) extent and

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frequency of marine growth removal; and (3) inspection extent (100 percent vs. sampling). Refer to amended License Renewal Application (LRA) Table A4-1. LRA, Section B2.1.32, Structures Monitoring Program, states: "The Intake Structure continues to require attention and remediation due to its location in a harsh coastal environment. As a result of a negative trend in concrete degradation, the Intake was placed back into Maintenance Rule goal setting (a)(1) status in December 2005. A repair plan is in place in order to return the Intake Structure to (a)(2) status by 2010."

PG&E has revised its schedule to return the Intake Structure to (a)(2) status due to an increase in the amount of repairs required. The Intake Structure is currently scheduled to be returned to (a)(2) status by the end of 2011. The Intake Structure will be returned to (a)(2) status prior to the period of extended operation. Refer to amended LRA Table A4-1. The schedule change supersedes the schedule described in LRA Section B2.1.32.

The enclosure contains LRA Amendment 43, which contains the affected LRA pages with changes shown as electronic markups (deletions crossed out and insertions underlined).

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 March 25, 2011.

Sincerely,

James R. Becker  
*Site Vice President*

gwh/50381916 / 50382232

Enclosure

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, NRC Licensing Project Manager

<b>LRA Amendment 43</b> <b>Affected LRA Section</b>
Table A4-1

Table A4-1 License Renewal Commitments

Item #	Commitment	LRA Section	Implementation Schedule
69	<i>Marine growth removal and subsequent inspection of all required areas of the Unit 1 and Unit 2 discharge conduits will be completed prior to the period of extended operation. The Unit 2 discharge conduit is currently scheduled to be completed during 2R17 (2013). The Unit 1 discharge conduit is currently scheduled to be completed during 1R17 (2012).</i>	B2.1.32	<i>Prior to the period of extended operation</i>
70	<i>The requirements for future discharge conduit inspections including those to be performed during the period of extended operation will be developed based on the findings from the 1R17 / 2R17 inspections. These requirements will address the following: (1) inspection interval (not to exceed 5 years); (2) extent and frequency of marine growth removal; and (3) inspection extent (100 percent vs. sampling).</i>		<i>Prior to the period of extended operation.</i>
71	<i>The Intake Structure will be returned to (a)(2) status prior to the period of extended operation. The Intake Structure is currently scheduled to be returned to (a)(2) status by the end of 2011</i>	B2.1.32	<i>Prior to the period of extended operation</i>