

Security-Related Information—Withhold Under 10 CFR 2.390



**Pacific Gas and
Electric Company®**

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April 4, 2011

PG&E Letter DCL-11-040

10 CFR 50.90

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 Request for Additional Information E-mail dated March 4, 2011, from the U.S. Nuclear Regulatory Commission (ME4290 and ME4291) Concerning the Diablo Canyon Power Plant, Units 1 and 2, Cyber Security Plan License Amendment Request 09-05

Dear Commissioners and Staff:

Pacific Gas and Electric Company (PG&E) submitted PG&E Letter DCL-10-087, "License Amendment Request 09-05, Request for Approval of the Diablo Canyon Power Plant Cyber Security Plan and Revision to the Facility Operating Licenses," on July 22, 2010 (ML102150081). On March 4, 2011, the NRC sent an e-mail to PG&E with a request for additional information (RAI) regarding records retention, implementation schedule, and scope of systems associated with the Diablo Canyon Power Plant (DCPP) Cyber Security Plan (CSP) (ML110630071). In response to the RAI, PG&E provides the following supplemental information and replaces documents provided in the July 22, 2010, License Amendment Request.

Enclosure 1 provides PG&E's responses to the RAI.

Enclosure 2 provides an updated markup of the facility operating license.

Enclosure 3 provides a copy of the revised DCPP Cyber Security Plan Implementation Schedule. The actions and dates on the schedule are regulatory commitments.

Enclosure 4 provides a copy of the updated DCPP Cyber Security Plan dated March 2011, which is a stand-alone document that will be incorporated by reference into the DCPP Physical Security Plan upon approval. The revised DCPP CSP incorporates changes needed to address the NRC RAIs, as well as other changes consistent with NEI 08-09 Revision 6. Changes are indicated with revision bars.

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*Enclosures 1, 3, and 4 contain "SECURITY-RELATED INFORMATION,"
Upon separation of enclosures 1, 3, and 4, this letter is "DECONTROLLED."*

A member of the STAR5 (Strategic Teaming and Resource Sharing) Alliance

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Enclosures 1, 3, and 4 contain security-related sensitive information, which could reasonably be expected to be useful to potential adversaries. PG&E therefore requests that Enclosures 1, 3 and 4 be withheld from public disclosure in accordance with 10 CFR 2.390.

If you have any questions regarding this response, please contact Mr. Thomas Baldwin, Regulatory Services Manager, at (805) 545-4720.

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

Executed on April 4, 2011.

Sincerely,

James R. Becker
Site Vice President

Imp/50379537

Enclosures

- cc: Gary W. Butner, Branch Chief, California Department of Public Health
Elmo E. Collins, NRC Region IV Regional Administrator
Michael S. Peck, NRC Senior Resident Inspector
Diablo Distribution
- cc/enc. James T. Polickoski, NRC Licensing Project Manager
Alan B. Wang, NRC Licensing Project Manager

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Proposed Facility Operating License Change (Mark-Up)

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Insert the following text within the current facility operating license condition for Physical Protection and after its existing text:

By December 31, 2015, PG&E shall fully implement and maintain in effect all provisions of the Commission-approved DCPD Cyber Security Plan submitted by letter dated April 4, 2011, and withheld from public disclosure in accordance with 10 CFR 2.390.

E. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54 (p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Diablo Canyon Power Plant, Units 1 and 2 Physical Security Plan, by Training and Qualification Plan, and Safeguards Contingency Plan," submitted by letter dated May 16, 2006.

By December 31, 2015, PG&E shall fully implement and maintain in effect all provisions of the Commission-approved DCPD Cyber Security Plan submitted by letter dated April 4, 2011, and withheld from public disclosure in accordance with 10 CFR 2.390.

F. Deleted.

G. Deleted.

H. Financial Protection

PG&E shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

I. Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:

1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following:

1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

D. Exemption (SSER 31, Section 6.2.6)

An exemption from certain requirements of Appendix J to 10 CFR Part 50 is described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report, Supplement No. 9. This exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. Therefore, this exemption previously granted in Facility Operating License No. DPR-81 pursuant to 10 CFR 50.12 is hereby reaffirmed. The facility will operate, with the exemption authorized, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.

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