



June 10, 2011

PG&E Letter DCL-11-065

10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Docket No. 50-275, OL-DPR-80

Docket No. 50-323, OL-DPR-82

Diablo Canyon Units 1 and 2

Thirty-Day Response to NRC Bulletin 2011-01: "Mitigating Strategies"

On May 11, 2011, the NRC issued Bulletin 2011-01, "Mitigating Strategies," (referred herein as the Bulletin). The Bulletin requires that Pacific Gas & Electric Company (PG&E) submit written responses within 30 and 60 days of the Bulletin.

The Bulletin was issued to:

- (1) require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2),
- (2) notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if (1) additional assessment of program implementation is needed, (2) the current inspection program should be enhanced, or (3) further regulatory action is warranted, and
- (3) require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

The enclosure provides PG&E's 30-day response to the Bulletin and is being submitted in accordance with 10 CFR 50.54(f).

PG&E makes no regulatory commitments (as defined by NEI 99-04) in this letter. This letter includes no revisions to existing regulatory commitments.

If you have any questions regarding this response, please contact Mr. William Guldmond, Special Assistant to the Site Vice President, at (805) 545-4369.



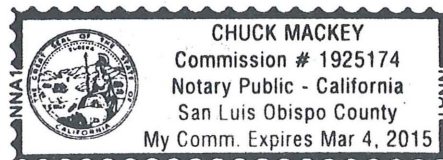
AFFIDAVIT

Kenneth J. Peters, of lawful age, first being duly sworn upon oath says that he is Vice President – Engineering Services of Pacific Gas and Electric Company; that he has executed this response to NRC Bulletin 2011-01 on behalf of said company with full power and authority to do so; that he is familiar with the content thereof; and that the facts stated therein provided by his staff are true and correct to the best of his knowledge, information, and belief.


Kenneth J. Peters
Vice President – Engineering Services

Subscribed and sworn to before me this 10th day of June 2011.
County of San Luis Obispo
State of California


Notary Public



gwh/50399546
Enclosure

cc: Elmo E. Collins, NRC Region IV
Michael S. Peck, NRC Senior Resident Inspector
James T. Polickoski, NRR Project Manager
Alan B. Wang, NRR Project Manager

CALIFORNIA JURAT WITH AFFIANT STATEMENT

State of California

County of San Luis Obispo } ss.

☒ See Attached Document (Notary to cross out lines 1-6 below)

☐ See Statement Below (Lines 1-5 to be completed only by document signer[s], not Notary)

1
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Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

Subscribed and sworn to (or affirmed) before me on this

10 day of June, 2011, by
Date Month Year

(1) Kenneth John Peters,
Name of Signer

☐ Personally known to me

☒ Proved to me on the basis of satisfactory evidence
to be the person who appeared before me (.) (,)

(and

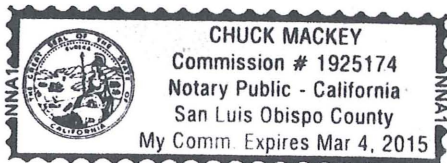
(2) _____,
Name of Signer

☐ Personally known to me

☐ Proved to me on the basis of satisfactory evidence
to be the person who appeared before me.)

Chuck Mackey
Signature of Notary Public

Place Notary Seal Above



OPTIONAL

*Though the information below is not required by law, it may prove
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fraudulent removal and reattachment of this form to another document.*

Further Description of Any Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

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OF SIGNER #1
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OF SIGNER #2
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**PG&E 30-Day Response to NRC Bulletin 2011-01
Mitigating Strategies**

NRC Question 1:

Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?

PG&E Response 1:

10 CFR 50.54(hh)(2) requires licensees to implement guidance and strategies under the circumstances associated with loss of large areas of the plant due to explosions or fire in the following areas: (1) fire fighting; (2) operations to mitigate fuel damage; and (3) actions to minimize radiological release. The Diablo Canyon Power Plant guidelines and strategies are provided in the following primary correspondence on this topic:

- (1) PG&E Letter DCL-05-058, "Response to NRC Guidance Regarding Mitigation Strategies", dated May 25, 2005.
- (2) PG&E Letter DCL-07-001, "Response Providing Implementation Details for the Phase 2 and 3 Mitigation Strategies", dated January 11, 2007.
- (3) PG&E Letter DCL-07-051, "Response to NRC Request for Additional Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies", dated May 8, 2007.

Equipment necessary to execute the PG&E 10 CFR 50.54(hh)(2) licensing basis mitigating strategies described in the above documents is available and capable of performing its intended function. This was confirmed by walking down equipment that is used in the performance of the Extreme Damage Mitigation Guidelines (EDMGs), Extreme Damage Guidelines, and Extreme Damage Water Management Guidelines to verify the equipment is available. In addition, applicable site mitigation casualty procedures were walked down in the same manner as the EDMGs.

NRC Question 2:

Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

PG&E Response 2:

10 CFR 50.54(hh)(2) requires licensees to implement guidance and strategies under the circumstances associated with loss of large areas of the plant due to explosions or fire in the following areas: (1) fire fighting; (2) operations to mitigate fuel damage; and (3) actions to minimize radiological release. The PG&E 10 CFR 50.54 (hh)(2) licensing basis guidelines and strategies are capable of being executed considering Diablo

Canyon Power Plant's current configuration, current staffing, and skill levels of the staff. To confirm this, the Extreme Damage Mitigation Guidelines, Extreme Damage Guidelines, Extreme Damage Water Management Guidelines, and applicable casualty procedures were reviewed and determined to be executable based on the in-plant walkdowns.