



**Pacific Gas and
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PG&E Letter DCL-11-076

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

10 CFR 50.48(c)

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Request for Extension of Enforcement Discretion and Commitment to Submittal
Date for 10 CFR 50.48(c) License Amendment Request

Dear Commissioners and Staff:

References:

1. SECY-11-0061, A Request to Revise the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(c) to Allow Licensees to Submit License Amendment Requests in a Staggered Approach (RIN 3150-AG48), dated April 29, 2011
2. Staff Requirements Memorandum SECY-11-0061, A Request to Revise the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(c) to Allow Licensees to Submit License Amendment Requests in a Staggered Approach (RIN 3150-AG48), dated June 10, 2011
3. PG&E Letter DCL-08-088, to NRC, Request for Extension of Enforcement Discretion and Revised Submittal Date for 10 CFR 50.48(c) (NFPA 805) License Amendment Request, dated October 15, 2008

In accordance with Reference 1, and as approved by the Commission per Reference 2, Pacific Gas & Electric Company (PG&E) commits to submit the License Amendment Request (LAR) implementing 10 CFR 50.48(c) for Diablo Canyon Power Plant (DCPP) by June 28, 2013.

The additional time to submit the DCPP NFPA 805 LAR will allow incorporation of additional lessons learned from prior submittals, and is consistent with the need for the NRC to stagger the receipt of NFPA 805 LARs.

This is a change that supersedes the schedule submitted in Reference 3. This letter contains one new commitment, and no revisions to existing commitments.



Independent of these licensing actions and as part of the transition to a risk-informed fire protection program, PG&E plans to implement the following risk reduction modifications:

- 1) Installing incipient fire detection in Main Control Room, Cable Spreading Room and Solid State Protection System Room cabinets;
- 2) Enhancing Hot Shutdown Panel isolation;
- 3) Installing Electrical Raceway Fire Barrier Systems; and
- 4) Modifying the Reactor Coolant Pump seals and radial bearing cooling

These modifications are being tracked in the Corrective Action Program with a reference to this letter.

In addition, PG&E requests that the enforcement discretion be extended to correspond to the LAR submittal commitment date. Per the enforcement discretion policy, once the LAR is submitted, the enforcement discretion would then continue until the NRC dispositions the LAR to transition to NFPA 805, consistent with Reference 1.

Please contact Mr. Tom Baldwin at (805) 545-4720, if there are any questions.

Sincerely,

James R. Becker
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Imp/50037411 task 2

cc: Thomas B. Basso, NEI Senior Project Manager
Gary W. Butner, Branch Chief, California Department of Public Health
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