



November 16, 2011

10 CFR 72.48

PG&E Letter HIL-11-009

ATTN: Document Control Desk
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

License No. SNM-2514, Docket No. 72-27
Humboldt Bay Independent Spent Fuel Storage Installation
Changes to Technical Specification Bases and 10 CFR 72.48 Report of Changes,
Tests, and Experiments for the Period of November 18, 2009 through November 17,
2011

Dear Commissioners and Staff:

Pursuant to the requirements of the Humboldt Bay Independent Spent Fuel Storage Installation (ISFSI) Technical Specification (TS) 5.1.1, "Technical Specifications (TS) Bases Control Program," Pacific Gas and Electric Company (PG&E) hereby submits a report of the changes made to the TS Bases without prior NRC approval for the period of November 18, 2009 through November 17, 2011. In addition, pursuant to the requirements of 10 CFR 72.48(d)(2) and in accordance with 10 CFR 72.4, PG&E hereby submits a report of changes, tests and experiments for the period of November 18, 2009 through November 17, 2011.

Changes to the ISFSI TS Bases

Humboldt Bay ISFSI TS 5.1.1, "Technical Specifications (TS) Bases Control Program," provides a means for processing changes to the Bases of the TS. TS 5.1.1.b states that changes to the TS Bases may be made without prior NRC approval in accordance with the criteria in 10 CFR 72.48. Further, TS 5.1.1.d requires that changes to the TS Bases implemented without prior NRC approval be provided to the NRC on a frequency consistent with 10 CFR 72.48 (d)(2). For the 24-month period of November 18, 2009 through November 17, 2011, PG&E did not process any changes to the TS Bases. The ISFSI TS Bases submitted to the NRC in PG&E Letter HIL-09-006, dated November 17, 2009, are still applicable.

Changes in the Facility as Described in the Final Safety Analysis Report (FSAR)

No changes requiring 10 CFR 72.48 evaluations were made to the facility as described in the FSAR during the 24-month period of November 18, 2009 through November 17, 2011.

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Changes in Procedures as Described in the FSAR

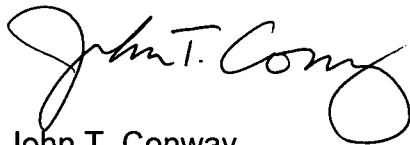
No changes requiring 10 CFR 72.48 evaluations were made to procedures as described in the FSAR during the reporting period.

Tests and Experiments Not Described in the FSAR

No tests or experiments not described in the FSAR were performed during the reporting period.

If you have any questions regarding this submittal, please contact Mr. David Sokolsky at (707) 444-0801.

Sincerely,



John T. Conway
Senior Vice President – Energy Supply and Chief Nuclear Officer

cc: William C. Allen, NRC NMSS
Elmo J. Collins, NRC Region IV
Vincent Everett, NRC Region IV
HBPP Humboldt Distribution