



**Pacific Gas and
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PG&E Letter DCL-11-139

U.S. Nuclear Regulatory Commission
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10 CFR 50.54(f)

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2

Response to NRC Letter dated November 28, 2011, Request for Additional
Information Regarding 60-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), to request that each licensee provide a comprehensive verification of its compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2). The Bulletin required that Pacific Gas and Electric Company (PG&E) submit written responses within 30 and 60 days of the Bulletin. PG&E submitted its 30-day response in PG&E Letter DCL-11-065, dated June 10, 2011 (ML111640426). PG&E submitted its 60-day response in PG&E Letter DCL-11-081, dated July 11, 2011 (ML111930165).

By letter dated November 28, 2011, the NRC staff requested additional information needed to continue its review of the Bulletin response.

Enclosed is PG&E's response to the request for additional information.

PG&E makes no regulatory commitments (as defined in NEI 99-04) in this letter.

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



Kenneth J. Peters

jwh/50439548

Enclosure

cc: Diablo Distribution

cc/enc: Elmo E. Collins, NRC Region IV Regional Administrator

Michael S. Peck, NRC Senior Resident Inspector

Alan B. Wang, NRC Project Manager NRR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

_____)	Docket No. 50-275
In the Matter of)	Facility Operating License
PACIFIC GAS AND ELECTRIC COMPANY)	No. DPR-80
)	
Diablo Canyon Power Plant)	Docket No. 50-323
Units 1 and 2)	Facility Operating License
_____)	No. DPR-82

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 RAI Response 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.

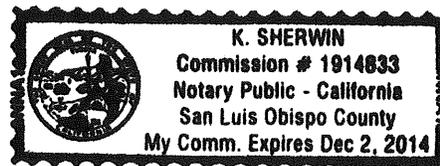

Kenneth J. Peters
Vice President – Engineering Services

State of California
County of San Luis Obispo

Subscribed and sworn to (or affirmed) before me on this 21st day of December, 2011, by Kenneth J. Peters, proved to me on the basis of satisfactory evidence to be the person who appeared before me.



(Notary Public Signature)



(Notary Public Seal)

**PG&E Response to NRC Letter dated November 28, 2011,
Request for Additional Information for the NRC Bulletin 2011-01 60-Day Response**

RAI 1

Please describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases.

PG&E Response to RAI 1

PG&E maintains two oscillating monitor nozzles specifically for implementation of the extreme damage mitigation guidelines. These monitor nozzles were deployed in a test to demonstrate that required flow and spray pattern could be achieved.

These oscillating monitor nozzles are inventoried annually. As an enhancement to the annual inventory, it was determined that the vendor-recommended inspection should also be performed. This inspection involves manipulation of the movable parts and testing of the safety features. These monitor nozzles were inspected in accordance with the vendor recommendations on December 8, 2011, and a requirement has been established to continue to inspect the monitor nozzles annually.

In addition, DCCP maintains other nozzles. These nozzles could be for firefighting, spent fuel pool spray strategies, or as a means to reduce the magnitude of fission product releases in accordance with the Diablo Canyon Fire Protection Program. The Fire Protection Program requires inspecting nozzles that would be used outdoors at least annually, and nozzles that would be used indoors at least every 3 years. These nozzle inspections are performed in accordance with the 1998 edition of NFPA 1962.

RAI 2

Please describe in detail how the licensee ensures there is sufficient fuel for the pumping source when needed.

The bulletin requested that each licensee describe in detail the maintenance of equipment supporting the mitigating strategies to ensure that it will be functional when needed.

PG&E Response to RAI 2

PG&E maintains a single fire engine and diesel fuel truck as part of the licensing commitments as stated in PG&E Letter DCL-07-001 dated January 11, 2007, as accepted by the NRC in a letter dated July 11, 2007. This fire engine is used specifically to implement requirements of the extreme damage mitigation guidelines to maintain a pumping source for at least 12 hours. The fire engine uses approximately 8 gallons of diesel fuel per hour when in operation. A 12-hour fuel supply would require approximately 100 gallons of fuel. The smallest volume diesel fuel truck is equipped with an approximate 1500-gallon capacity tank. A vendor is contracted to deliver diesel fuel to the site. It is through the vendor contract that PG&E ensures that there is sufficient fuel for the pumping source.

RAI 3

Please describe in detail how the licensee ensures the availability of San Luis Obispo Fire Department to provide offsite support in response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organizations relied upon for emergency response. The safety evaluation documenting the NRC review of the licensee's response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026) relied upon statements the licensee made regarding support that the San Luis Obispo Fire Department could provide. The San Luis Obispo Fire Department was not listed in the response to Question 5 of Bulletin 2011-01.

PG&E Response to RAI 3

The California Department of Forestry and Fire Protection (CALFIRE) functions as the San Luis Obispo County Fire Department through a contract. PG&E ensures the availability of CALFIRE by maintaining a memorandum of understanding with them to provide offsite support in the form of fire fighting equipment and resources necessary to respond to a B.5.b event. CALFIRE is also part of a mutual aid agreement that provides for systematic mobilization, organization and operation of fire service resources in mitigating the effects of disasters. This mutual aid agreement consists of all 58 California counties and nearly all city government fire agencies.