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PG&E Letter DCL-13-066

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

10 CFR 50.4

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Commitment for Implementation of Multi-Unit/Multi-Source Dose Assessment
Capability

References:

1. SECY-11-0093, "Near-Term Report and Recommendations for Agency Actions Following the Events in Japan," dated July 12, 2011
2. NEI Letter, J.E. Pollock NEI to J.T. Wiggins NRC, "Industry Implementation of Multi-Unit Dose Assessment Capability," dated January 28, 2013
3. NRC Letter, J.T. Wiggins NRC to J.E. Pollock NEI, "Regarding Industry Implementation of Multi-Unit Dose Assessment Capability," dated February 27, 2013
4. NEI Letter, J.E. Pollock NEI to J.T. Wiggins NRC, "Commitment for Implementation of Multi-Unit Dose Assessment Capability," dated March 14, 2013

Dear Commissioners and Staff:

The Nuclear Regulatory Commission (NRC) issued Reference 1, which includes multi-unit/multi-source dose capability as a part of Near-Term Task Force (NTTF) Recommendations 9.1 and 9.3. The NRC classified this NTTF recommendation as part of the Tier 2 Fukushima requirements.

On January 28, 2013, Nuclear Energy Institute (NEI) staff submitted Reference 2 to the NRC. Reference 2 discusses a NEI survey of licensees to determine when multi-unit/multi-source dose capabilities will be in place.



The NRC responded to Reference 2 in Reference 3. Reference 3 requests additional information on the number of sites that currently have multi-unit/multi-source dose assessment capability, the number of sites which do not, and specifically, when all licensees will have the capability to conduct multi-unit dose assessment.

NEI responded to Reference 3 in Reference 4. Reference 4 indicates that the industry would provide the NRC with: (1) a summary of the current capability to perform multi-unit/multi-source dose assessment; (2) the anticipated schedule to establish multi-unit/multi-source dose assessment capability on an interim and/or permanent basis; (3) due dates associated with each key schedule action or milestone; (4) a description of how the implementation schedule will be tracked and the associated tracking identifiers; and (5) a commitment to complete permanent capability to perform multi-unit/multi-source dose assessments no later than December 31, 2014.

Enclosure 1 of this letter provides the information requested in Reference 4 for Diablo Canyon Power Plant Units 1 and 2 multi-unit/multi-source dose assessment capability.

PG&E is making regulatory commitments (as defined by NEI 99-04) in Enclosure 2 of this letter. This letter includes no revisions to existing regulatory commitments.

If you have any questions, or require additional information, please contact Mr. Terence L. Grebel at (805) 781-9787.

Sincerely,

Barry S. Allen
Site Vice President

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Enclosures

cc: Diablo Distribution
cc:/enc: Thomas R. Hipschman, NRC, Senior Resident Inspector
Arthur T. Howell, III, NRC Region IV
Eric J. Leeds, NRR Director
Susan Perkins-Grew, NEI, Director Emergency Preparedness
James T. Polickoski, NRR Project Manager

Multi-unit/Multi-source Dose Assessment Capability
Diablo Canyon Power Plant Units 1 and 2

Request #1

Provide a summary of the current capability to perform multi-unit/multi-source dose assessment.

PG&E Response to Request #1

Currently, Pacific Gas and Electric Company (PG&E) utilizes the emergency assessment response system (EARS) and meteorological information and dose assessment software (MIDAS) to perform offsite dose assessments. EARS and MIDAS have the ability to perform single release point calculations. Individual dose assessments for a single release point are conducted in accordance with an existing plant procedure.

Request #2

For those who do not have this capability, provide the anticipated schedule to establish multi-unit/multi-source dose assessment on an interim and/or permanent basis. It is expected that interim measures will be available to perform this function prior to implementation of a permanent solution. Holders of a Combined License (COL) will address the implementation of a multi-unit/multi-source dose assessment capability consistent with their licensing, construction and startup schedules.

PG&E Response to Request #2

On an interim basis, PG&E will revise procedures and train the emergency response organization (ERO) to conduct individual dose assessments for multiple release points. The procedural and training interim actions are currently scheduled to be completed by December 31, 2013.

On a long-term basis, PG&E will update its dose assessment programs in order to conduct multi-unit/multi-source dose assessments by December 31, 2014.

The following table provides PG&E's implementation milestone schedule to establish multi-unit/multi-source dose assessment capability.

Milestone	Completion Date
Interim Actions	
Procedures revised to incorporate interim multi-unit/multi-source dose assessment.	December 31, 2013
Complete ERO training on the interim multi-unit/multi-source dose assessment.	December 31, 2013

Milestone	Completion Date
Long-Term Actions	
Update and test multi-unit/multi-source dose assessment programs.	August 30, 2014
Complete procedure revisions and ERO training on the updated multi-unit/multi-source dose assessment.	October 30, 2014
Full capability to conduct multi-unit/multi-source dose assessments.	December 31, 2014

Request #3

Provide the due dates associated with each key schedule action or milestone.

PG&E Response to Request #3

The due dates associated with the key actions are provided in PG&E Response to Request #2.

Request #4

Provide a description of how the implementation schedule will be tracked and the associated tracking identifiers (e.g., a commitment tracking or corrective action system number).

PG&E Response to Request #4

PG&E implementation milestones of the multi-unit/multi-source dose assessment implementation will be tracked in Diablo Canyon Power Plant's Corrective Action Program Notification 50554098.

Regulatory Commitments

Pacific Gas and Electric Company (PG&E) is making the following regulatory commitment (as defined by NEI 99-04) in this submittal:

Commitment	Due Date
On an interim basis, PG&E will revise procedures and train the emergency response organization (ERO) to conduct individual dose assessments for multiple release points.	December 31, 2013
On a long term basis, PG&E will update its dose assessment programs in order to conduct multi-unit/multi-source dose assessments by December 31, 2014.	December 31, 2014