



August 22, 2013

PG&E Letter DCL-13-081

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

10 CFR 50.4

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

Pacific Gas and Electric Company's First Six-Month Status Report in Response to  
March 12, 2012, Commission Order Modifying Licenses with Regard to  
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events  
(Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
3. PG&E Letter DCL-12-105, "Pacific Gas and Electric Company's Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated October 25, 2012
4. PG&E Letter DCL-13-007, "Pacific Gas and Electric Company's Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission issued Reference 1 to Pacific Gas and Electric Company (PG&E). Reference 1 directs PG&E to develop, implement, and maintain guidance and strategies to maintain or restore core cooling,



containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Reference 1, Attachment 2.

Reference 1 required submission of an initial status report 60 days following issuance of Reference 2 and an overall integrated plan pursuant to Section IV, Condition C. Reference 3 provided PG&E's initial status report regarding mitigation strategies. Reference 4 provided PG&E's overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," provides direction regarding the content of the status reports. The enclosure to this letter provides PG&E's first six-month status report pursuant to Section IV, Condition C.2 of Reference 1.

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, or require additional information, please contact Mr. Patrick Nugent at (805) 781-9786.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2013.

Sincerely,

Barry S. Allen  
*Site Vice President*

gwh2/SAPN 50466122-6

Enclosure

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**Pacific Gas and Electric Company's First Six-Month Status Report for the Implementation of NRC Order EA-12-049**

**1. Introduction**

Pacific Gas and Electric Company (PG&E) developed an overall integrated plan (OIP) (Reference 1 [Refer to Section 9 of this enclosure for a list of references.]), documenting diverse and flexible strategies (FLEX), in response to Reference 2. This enclosure provides an update of milestone accomplishments since the submittal of Reference 1, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2. Milestone Accomplishments**

The following milestone(s) have been completed since the submittal of Reference 1, and are current as of July 31, 2013:

- (1) The Phase 1 staffing study was completed on March 29, 2013.
- (2) The Phase 1 staffing study was submitted to the Nuclear Regulatory Commission (NRC) by PG&E Letter DCL-13-040, "Response to March 12, 2012, NRC 10 CFR 50.54(f) Request for Information Regarding Recommendation 9.3, Phase 1 Staffing Assessment," dated April 24, 2013.

**3. Milestone Schedule Status**

The following table provides an update to Attachment 2 of Reference 1. It provides the activity status of each item, and a revised target completion date where applicable. The target dates are subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the Order implementation dates.

<b>Activity</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Submit 20-day report	Apr 2012	Complete	
Submit 60-day status report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
<b>Submit six-month status updates</b>			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Not started	
Update 3	Aug 2014	Not started	
Update 4	Feb 2015	Not started	
Update 5	Aug 2015	Not started	

Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Update 6	Feb 2016	Not started	
Update 7	Aug 2016	Not started	
<b>Modifications timeline</b>			
Phase 1 Modifications			
a. Design	N/A	N/A	
b. Equipment Procurement	N/A	N/A	
c. Installation	N/A	N/A	
Phase 2 Modifications			
a. Design	12/31/13	Started	12/31/14
b. Equipment Procurement	12/31/14	Started	
c. Unit 1 Installation	10/30/15	Not started	
d. Unit 2 Installation	5/31/16	Not started	
Phase 3 Modifications			
a. Design	12/31/13	Started	12/31/14
b. Equipment Procurement	12/31/14	Started	
c. Unit 1 Installation	10/30/15	Not started	
d. Unit 2 Installation	5/31/16	Not started	
<b>Procedure guidance implementation</b>			
a. Unit 1 Strategies	10/30/15	Not started	
b. Unit 2 Strategies	5/31/16	Not started	
c. Unit 1 Maintenance	10/30/15	Not started	
d. Unit 2 Maintenance	5/31/16	Not started	
e. Unit 1 Testing	10/30/15	Not started	
f. Unit 2 Testing	5/31/16	Not started	
<b>FLEX storage facilities</b>			
a. Area 10	12/31/14	Not started	
b. Lot 11	12/31/14	Started	
<b>Staffing analysis</b>			
a. Phase 1			
1. Study Complete	3/29/13	Complete	
2. NRC Submittal	4/30/13	Complete	
b. Phase 2			
1. Study Complete	5/27/15	Not started	
2. NRC Submittal	5/27/15	Not started	
<b>Training completion for the strategies</b>			
a. Unit 1	10/30/15	Not started	
b. Unit 2	5/31/16	Not started	
<b>Regional response center 2 (Phoenix) operational</b>			
	8/28/14	Started	
<b>Communications equipment implementation (PG&amp;E Letter DCL-12-110)</b>			
a. Phase 1	12/31/13	Started	
b. Phase 2	10/27/15	Not started	

Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Unit 1 Walk-throughs or Demonstrations	10/30/15	Not started	
Unit 2 Walk-throughs or Demonstrations	5/31/16	Not started	
Unit 1 FLEX implementation complete	10/30/15	Not started	
Unit 2 FLEX implementation complete	5/31/16	Not started	

#### 4. Changes to Compliance Method

The following identifies changes to Reference 1 and the reason for each change. All changes meet applicable NEI 12-06 compliance methods.

##### Change 1 – “General Integrated Plan Elements”

- (1) Corrected title of NEI 12-06.
- (2) Clarification: "External Flooding": The emergency auxiliary saltwater (EASW) pumps are staged in an area potentially susceptible to storm and tsunami flooding events. However, storm and recurring tsunamis following an extended loss of alternating current power (ELAP) event are not required to be assumed initial conditions as specified in NEI 12-06. Although storm and recurring tsunami flooding is not required to be assumed following an ELAP event, redundant EASW pumps are stored at locations not susceptible to flooding.
- (3) Clarification: "Identify how the programmatic controls will be met": The unavailability of FLEX portable equipment and permanent FLEX connection points will be managed using equipment control guidelines developed in accordance with NEI 12-06.

##### Change 2 – “Maintain Core Cooling and Heat Removal”

- (1) The primary connection point location when steam generators (SGs) are not available is moved from the boron injection tank room on the safety injection line to the residual heat removal (RHR) crosstie line on the 100-foot elevation in each unit. The crosstie line will be modified to add a valve with a standardized hose connection in each unit. The deployment path from the emergency auxiliary feedwater (EAFW) pump to the primary and alternate connection points is changed. OIP Figures 6C, 6D, 7C, 7D, and 9C have been deleted. OIP deployment path Figures 6B, 7B, 8A, 9A, 9B, and 9D are revised. Attachment A provides the location of the RHR crosstie connection point for Unit 1 (Figure 6E) and the location of the RHR crosstie connection point for Unit 2 (Figure 7E).

The new primary connection point will provide the flow necessary for cooling without SGs available. The RHR crosstie line is safety-related and seismically qualified and is in an area that is accessible to facilitate hose installation from the EAFW pump. The deployment path to the primary connection ends at the 100-foot elevation instead of the 73-foot elevation due to the connection point change. The deployment path to the alternate connection is an improved path.

- (2) A clarification note is added to show that only one of two alternate connection points shown in OIP Figures 3 and 4 will be in service at any time.
- (3) The primary connection shown in OIP Figures 3 and 4 is changed from a double vent valve to a single vent valve and a cap, which meets auxiliary feedwater single isolation criteria.
- (4) Corrected OIP Figure 3 to show primary connection flow to all four SGs.
- (5) Completed OI-2, OI-3, and OI-4. Refer to Section 6 of this enclosure.
- (6) "PWR Portable Equipment Phase 3": Clarified that a backup set of Phase 2 pumps and generators will be provided by the regional response center (RRC).

### Change 3 – "Maintain RCS Inventory Control"

- (1) The suction connection point from the terminated line at the bottom of the boric acid storage tank (BAST) is changed to the boric acid transfer pump suction crosstie line in each Unit. The crosstie line will be modified to provide for a valve and hose connection in each unit. The deployment path from the emergency reactor coolant system (ERCS) pump is changed in each unit. OIP deployment path Figures 6A, 6B, 7B, 8A, 8B, and 9B are revised. Attachment A provides the location of the BAST suction connection point for Unit 1 (Figure 10) and the BAST suction connection point for Unit 2 (Figure 11).

The new connection point allows each connection to draw from the associated unit's BASTs. The crosstie line is safety-related and seismically qualified and is in an area that is accessible to facilitate suction hose connection. The deployment path change was made due to the revised connection point and is an improved path.

- (2) Corrected key reactor parameter to be monitored in Phases 1 and 3 from reactor coolant system (RCS) wide-range temperature to RCS wide-range pressure.

- (3) Completed OI-3 and OI-8. Refer to Section 6 of this enclosure.
- (4) "PWR Portable Equipment Phase 3": Clarified that a backup set of Phase 2 pumps and generators will be provided by the RRC.

#### Change 4 – "Maintain Containment"

Deleted containment temperature as a key containment parameter to be monitored during all phases, which is consistent with NEI 12-06, Section 3.2.1.10.

#### Change 5 – "Maintain Spent Fuel Pool Cooling"

- (1) Corrected spent fuel pool (SFP) Level 1 from 133 feet to 134 feet 5 inches, which is consistent with PG&E's response to an NRC request for additional information pertaining to reliable SFP instrumentation (Reference 6).
- (2) OIP Figure 9: Corrected SFP alternate connection valve identification in Unit 2 from SFS-1-8771B to SFS-2-8771B.
- (3) "PWR Portable Equipment Phase 3": Clarified that a backup set of Phase 2 pumps and generators will be provided by the RRC.

#### Change 6 – "Safety Functions Support"

- (1) "PWR Portable Equipment Phase 3":
  - (a) Deleted backup EASW pumps will be stored onsite. EASW pumps are part of the Maintain Core Cooling and Heat Removal strategy.
  - (b) Clarified that a backup set of Phase 2 pumps and generators will be provided by the RRC. Clarified that each 4-kilovolt (kV) generator set will be used to repower one train of cooling in a unit, which includes one component cooling water (CCW) pump, one residual heat removal (RHR) pump, and any 480-volt (V) loads required to support repowering for that unit.
- (2) Clarified that the RRC will provide generator sets.

Change 7 – OIP Table 1, “PWR Portable Equipment Phase 2”

- (1) Added performance criteria; changed the number of portable diesel-driven generators with lighting masts; and added telecommunications equipment load to the 480-V diesel-driven generators.

Portable Equipment	Performance Criteria
Seven portable diesel-driven generators with lighting masts	5.2 kilowatt (kW)
Two 480-V diesel-driven generators for battery chargers and telecommunications equipment.	202kW
Two 480-V diesel-driven generators for ERCS pumps	49.4kW

- (2) Removed Note (b) to close out OI-7.

Change 8 – OIP Table 2, “PWR Portable Equipment Phase 3”

- (1) Removed mobile boration units. Refer to OI-3 in Section 6 of this enclosure.
- (2) Removed mobile water purification units. Refer to OI-2 in Section 6 of this enclosure.

Change 9 – OIP Table 3, “Response Equipment/Commodities”

- (1) Radiation protection equipment and commodities is removed because they will not be provided by the RRC.
- (2) Added examples of fuel requirements to be provided by the RRC to include diesel fuel oil storage/transportation equipment.

Change 10 – OIP Attachment 1A, “Sequence of Events Timeline”

- (1) Corrected elapsed time (hours) for Action 20 from 0.5 to 15. The 0.5 hours was the time to complete the action.
- (2) Corrected Action 21 to refer to the ERCS pump rather than the RCS pump.

Change 11 – OIP Attachment 2, “DCPP Units 1 and 2 Implementation Milestone Schedule”

Refer to Section 3 of this enclosure.



Change 12 – OIP Attachment 3, “Conceptual Sketches”

Deleted OIP deployment path Figures 6C, 6D, 7C, 7D, and 9C. Added connection point OIP Figures 6E and 7E. Refer to Change 2.

**5. Need for Relief/Relaxation and Basis for the Relief/Relaxation**

PG&E expects to comply with the order implementation date and no relief/relaxation is required at this time.

**6. Open Items from Overall Integrated Plan**

The following provides a summary and status of the open items documented in Reference 1.

OI-1

Required staffing levels will be verified by walkthroughs, tabletops, and simulations of the identified FLEX strategies as a part of the Phase 2 staffing studies conducted in accordance with NEI 12-01.

Status: Not started. The Phase 2 staffing assessment will be completed and submitted to the NRC four months prior to the Unit 1 19th refueling outage, which is currently schedule to begin in the Fall of 2015 (Reference 4).

OI-2

PG&E is also evaluating the use of portable water processing units to be supplied by the RRC.

Status: Complete. PG&E has determined that adequate seismically qualified/evaluated water sources are available for implementation of Phase 1 and 2 strategies. The Phase 3 strategy is to maintain core cooling by using the RHR system. Two portable diesel-driven EASW pumps, one for each unit, and rigid piping segments will be used to restore the ultimate heat sink function. The flow from the EASW pump will provide cooling water to the CCW heat exchangers. One 4-kV generator for each unit will be used to repower one train of cooling for that unit. This includes an RHR pump and a CCW pump. Therefore, with shutdown cooling restored, adequate capability is provided to maintain core cooling without additional water purification capability.

OI-3

PG&E is evaluating the use of mobile boration units to be supplied by the RRC.

Status: Complete. PG&E has determined that mobile boration is not required. The current strategy is to use the BASTs and refueling water storage tanks (RWSTs) as the borated water sources. For the RCS inventory control/long-term subcriticality function, PG&E will employ low-leakage reactor coolant pump seals. This will minimize the leakage of RCS fluid prior to secondary side cooldown, and the leakage will decrease to lower levels (total RCS leakage of about 1 gallon per minute or less) after secondary side cooldown. The BASTs are to provide borated inventory makeup to the RCS during at least the first 24 hours of post extended loss of all alternating current power coping, and the majority of RCS leakage will occur during this time. Therefore, the RWSTs are not expected to be needed for this function until after 24 hours. At that time, the total RCS leakage is expected to have reduced, and the RWSTs would be capable of providing makeup to allow adequate time to implement Phase 3.

The Phase 3 strategy is to maintain RCS inventory control/long-term subcriticality by using the RHR system. Two portable diesel-driven EASW pumps, one for each unit, and rigid piping segments will be used to restore the ultimate heat sink function. The flow from the EASW pump will provide cooling water to the CCW heat exchanger. One 4-kV generator for each unit will be used to repower one train of cooling for that unit. This includes an RHR pump and a CCW pump. Since water is not required to be added to implement this strategy, and the water source for the RHR pumps is either the RCS or containment sump (depending on amount of leakage that has occurred), no borated water source is required in Phase 3.

For the core cooling with SGs not available strategy, PG&E will provide borated water makeup to the vented RCS. The strategy would provide makeup to the RCS with the RWSTs until Phase 3 FLEX equipment is available to initiate the RCS shutdown cooling function of the plant to bring each unit to Cold Shutdown.

Therefore, with shutdown cooling restored, additional borated water from the mobile boration units is not required to maintain core subcriticality or to keep the core covered.

OI-4

RHR suction valves, accumulator isolation valves, and other valves inside containment are required to be manipulated. PG&E is currently evaluating the best method to manipulate these valves.

Status: This item is complete. PG&E has determined that RHR suction valves and accumulator isolation valves inside containment that are required to be manipulated to implement Phase 3 strategies will be operated manually. Conditions inside containment following an ELAP event will not preclude personnel entry to allow manual actions to be taken.

#### OI-5

PG&E will perform a containment evaluation based on the boundary conditions described in NEI 12-06, Section 2. Based on the results of this analysis, required actions to ensure maintenance of containment integrity and required instrument function will be developed.

Status: If an ELAP event occurs in Modes 1 through 4, PG&E has determined that the containment integrity will not be challenged. For Modes 1-4, the RCS remains intact. Consequently, heat removal from the RCS is through the SGs and heat input to containment is reduced. However, there is some heat input to the containment due to ambient losses from the RCS. PG&E evaluations indicate that the containment design pressure would not be exceeded for at least 30 days. This conclusion assumes that low-leakage reactor coolant pump seals are installed.

This OI was identified as a generic concern or question regarding containment integrity in Modes 5 and 6 during the NRC public meeting on April 18, 2013, regarding the NRC order on mitigating strategies (Order EA-12-049). The nuclear industry will resolve this concern generically through the NEI and the applicable industry groups (e.g., Pressurized Water Reactor Owners Group, Electric Power Research Institute, etc.). Once this concern is resolved, PG&E will provide an update to this OI in a periodic six-month update to the OIP. NEI will be coordinating with the NRC on the schedule for review.

#### OI-6

PG&E will develop procedures to read this instrumentation locally, where applicable, using a portable instrument as required by NEI 12-06, Section 5.3.3.

Status: Procedures are currently scheduled to be issued by October 31, 2015, for Unit 1 and May 31, 2016 for Unit 2.

#### OI-7

PG&E is developing the performance criteria for items with "TBD" in the Performance Criteria column in Table 1 of Reference 1.

Status: Complete. Refer to Section 4, Change 7 of this enclosure.

OI-8

Diablo Canyon Power Plant (DCPP) has existing safety-related, wide-range accumulator level indicators. PG&E is evaluating the use of the accumulators to inject into the RCS while preventing the injection of nitrogen.

Status: Complete. PG&E has determined that further investigation of this strategy is not required. The current strategy for RCS Inventory Control/Maintain Subcriticality is to use a high-pressure portable FLEX pump to provide borated coolant to the RCS from the BASTs. This strategy also requires that the accumulator isolation valves are closed prior to secondary side cooldown of the units to cold shutdown conditions as discussed in OI-4 above. This current strategy meets NEI 12-06 guidance. Therefore, no change in the strategy is required.

**7. Planned Communications Equipment Status Updates**

PG&E submitted its response to a request for additional information regarding the Recommendation 9.3 Communications Assessment (Reference 3). In its response, PG&E committed to provide a status update of the planned communications equipment in the six-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2. The following provides a summary of the planned communication equipment status update items documented in Reference 3 and the status of each.

Communication Item 1:

PG&E will evaluate the number of hand-held satellite phones, batteries, and chargers.

Status: As discussed in Reference 5, PG&E has determined 9 hand held satellite phones are required for the control room, technical support center, and emergency operations facility to ensure that a dedicated line will be available to perform State and County notifications. PG&E has procured a satellite phone. PG&E will procure an additional 8 satellite phones by December 31, 2013.

As discussed in Reference 3, each satellite phone will have 3 batteries. PG&E has determined that a total of 27 batteries and 5 multi-unit battery chargers are required to maintain communications within a 24-hour period. PG&E will procure an additional 18 satellite phone batteries and 5 multi-unit battery chargers by December 31, 2013.

Communication Item 2:

PG&E will provide the sheriff watch commander a fixed satellite phone with external antenna to maintain a constantly-available communication link with DCPP. Back-up

power for the sheriff watch commander's fixed satellite phone will be provided by an existing diesel generator with a 1000-gallon tank that is capable of providing 120 hours of power.

Status: As discussed in Reference 5, PG&E will install a fixed mount satellite phone with an externally mounted antenna in the sheriff watch commander's office by October 27, 2015. Back-up power details for the sheriff watch commander's satellite phone will be established during the design phase. The sheriff watch commander's satellite phone enhancement is on schedule.

### Communications Item 3:

PG&E will evaluate the number of radio batteries and chargers.

Status: As discussed in Reference 5, each radio will have 2 batteries for the 80 dual band radios and 75 single band radios. PG&E has determined that a total of 160 dual band radio batteries and 150 single band radio batteries are required to maintain communications within a 24 hour period. PG&E will procure an additional 80 dual band radio batteries and 75 single band batteries by October 27, 2015. PG&E has also determined that 14 6-unit and 20 single unit battery chargers for the dual band radios and 13 6-unit and 20 single-unit battery chargers for the single band radios are required to maintain communications within a 24 hour period. No additional radio battery chargers need to be procured.

### Communications Item 4:

PG&E will improve operation support center (OSC) communications by installing a radio console. PG&E committed to procure portable generators and equipment to ensure that adequate power will exist to support extended operations. The OSC will be equipped with a portable diesel generator, with a 24-hour fuel tank capacity, to provide power to lights and communications equipment.

Status: As discussed in Reference 5, PG&E will improve OSC radio communications by installing a radio console. Radios, batteries, and chargers will be relocated to support continued radio communications. The equipment, including backup power, will be placed in service with approved procedures as part of Phase 2 by October 27, 2015. The OSC communications improvements are on schedule.

Communications Item 5:

As discussed in Reference 5, PG&E will procure portable generators and equipment to ensure that adequate power will exist to support extended operations.

Status: The portable generators and equipment will be procured and placed in service with approved procedures as part of Phase 2 by October 27, 2015 (Reference 5). This activity is on schedule.

Communications Item 6:

PG&E will relocate the SmartMsg and Zetron pager systems from their current location to an existing structure that is seismically robust. The paging system battery will be battery backed, with a dedicated cable from a portable diesel generator, to ensure that adequate power will exist to support extended operations beyond 24 hours.

Status: As discussed in Reference 5, PG&E will relocate the SmartMsg and Zetron pager systems, as part of Phase 2, by October 27, 2015. Backup power details for the SmartMsg and Zetron pager systems relocation will be established during the design phase. The relocation of the SmartMsg and Zetron pager systems is on schedule.

Communications Item 7:

PG&E will establish credited manual actions and their procedures in accordance with NEI 12-01 and NRC Order EA-12-049.

Status: Credited manual actions and procedures for the Phase 1 communications are scheduled to be completed by December 31, 2013. Credited manual actions and procedures for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Communications Item 8:

PG&E will establish maintenance procedure for the planned enhancements, including operability testing, in accordance with NEI 12-01 and NRC Order EA-12-049.

Status: Maintenance procedures for the Phase 1 communications are currently scheduled to be completed by December 31, 2013. Maintenance procedures for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Communications Item 9:

PG&E will establish periodic inventory checks for the planned enhancements in accordance with NEI 12-01 and NRC Order EA-12-049.

Status: Periodic inventory checks for the Phase 1 communications are currently scheduled to be completed by December 31, 2013. Periodic inventory checks for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Communications Item 10:

Training plans will be developed for response personnel in plant groups such as the emergency response organization, fire, security, emergency planning, operations, engineering, and maintenance. The training plans will be developed in accordance with DCPD procedures using the systematic approach to training and will be implemented to ensure that the required DCPD staff is trained in accordance with NEI 12-01 and NRC Order EA-12-049.

Status: Training for applicable plant staff on the Phase 1 communications equipment is currently scheduled to be completed by December 31, 2013. Training for plant staff on the Phase 2 communications equipment is currently scheduled to be completed by October 27, 2015.

**8. Potential Draft Safety Evaluation Impacts**

There are no potential impacts to the Draft Safety Evaluation identified at this time.

**9. References**

The following references support the updates to the OIP described in this enclosure:

- (1) PG&E Letter DCL-13-007, "Pacific Gas and Electric Company's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013
- (2) NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
- (3) PG&E Letter DCL-13-012, "30-Day Response to Request for Additional Information Regarding the Recommendation 9.3 Communications Assessment," dated February 21, 2013

- (4) PG&E Letter DCL-12-048, "60-Day Response to NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012
- (5) PG&E Letter DCL-12-110, "Pacific Gas and Electric Company's Response to Recommendation 9.3 Communication Requests 1 and 3 and the Evaluation of Existing Communications Systems Power Supplies," dated October 29, 2012
- (6) PG&E Letter DCL-13-073, "Response to Request for Additional Information Regarding Overall Integrated Plan in Response to March 12, 2012, Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated July 18, 2013



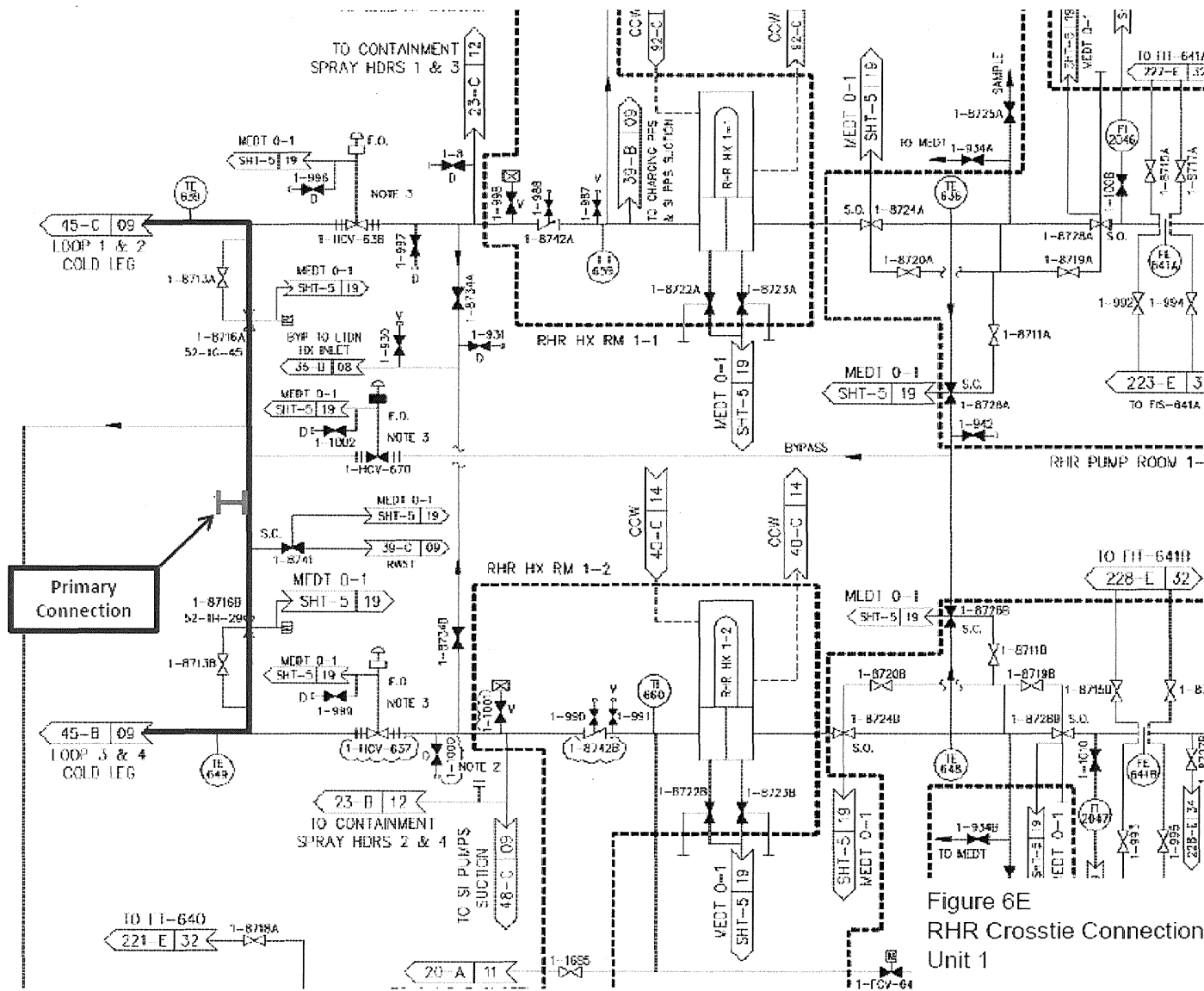


Figure 6E  
 RHR Crosstie Connection Point  
 Unit 1

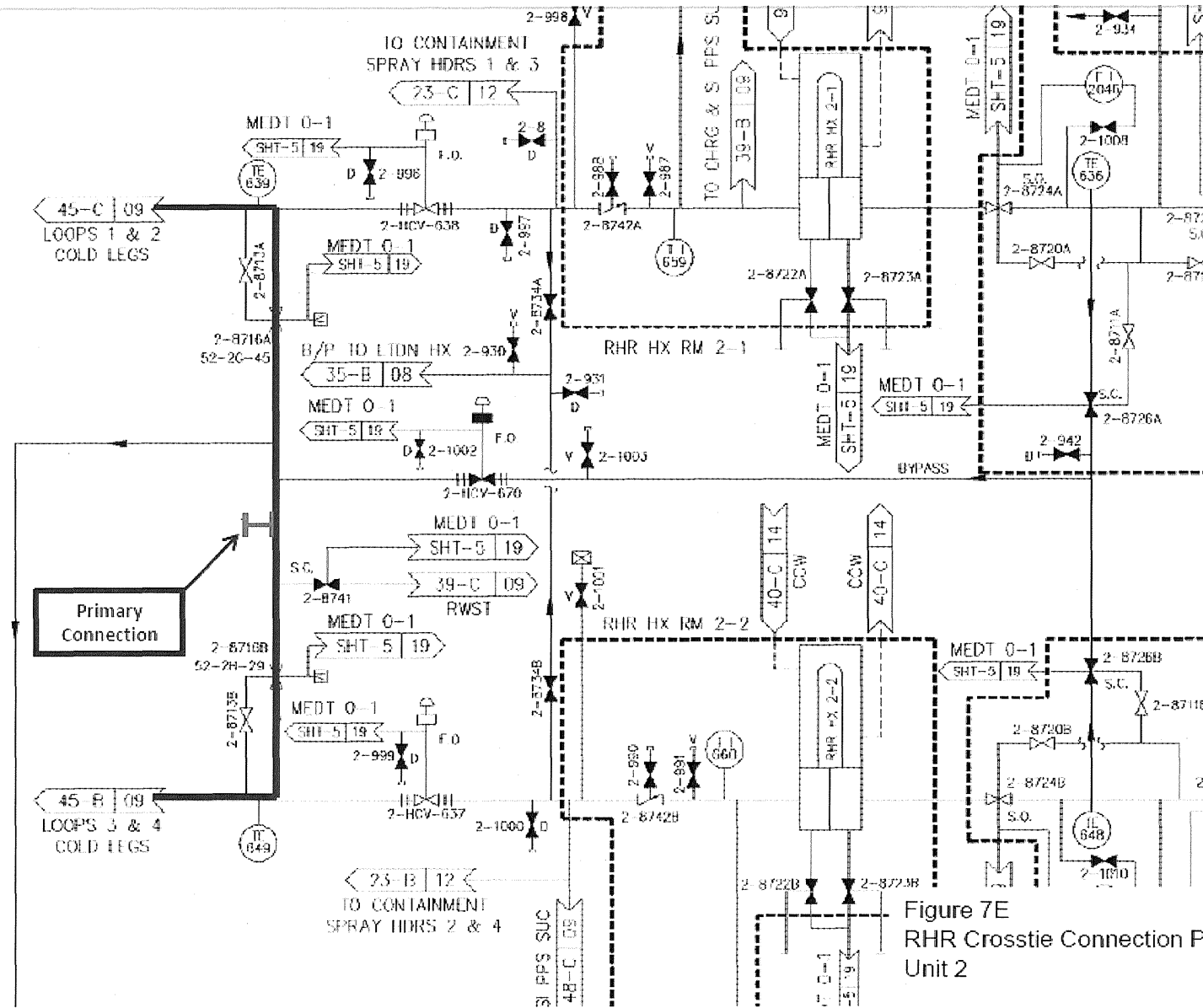


Figure 7E  
RHR Crosstie Connection Point  
Unit 2

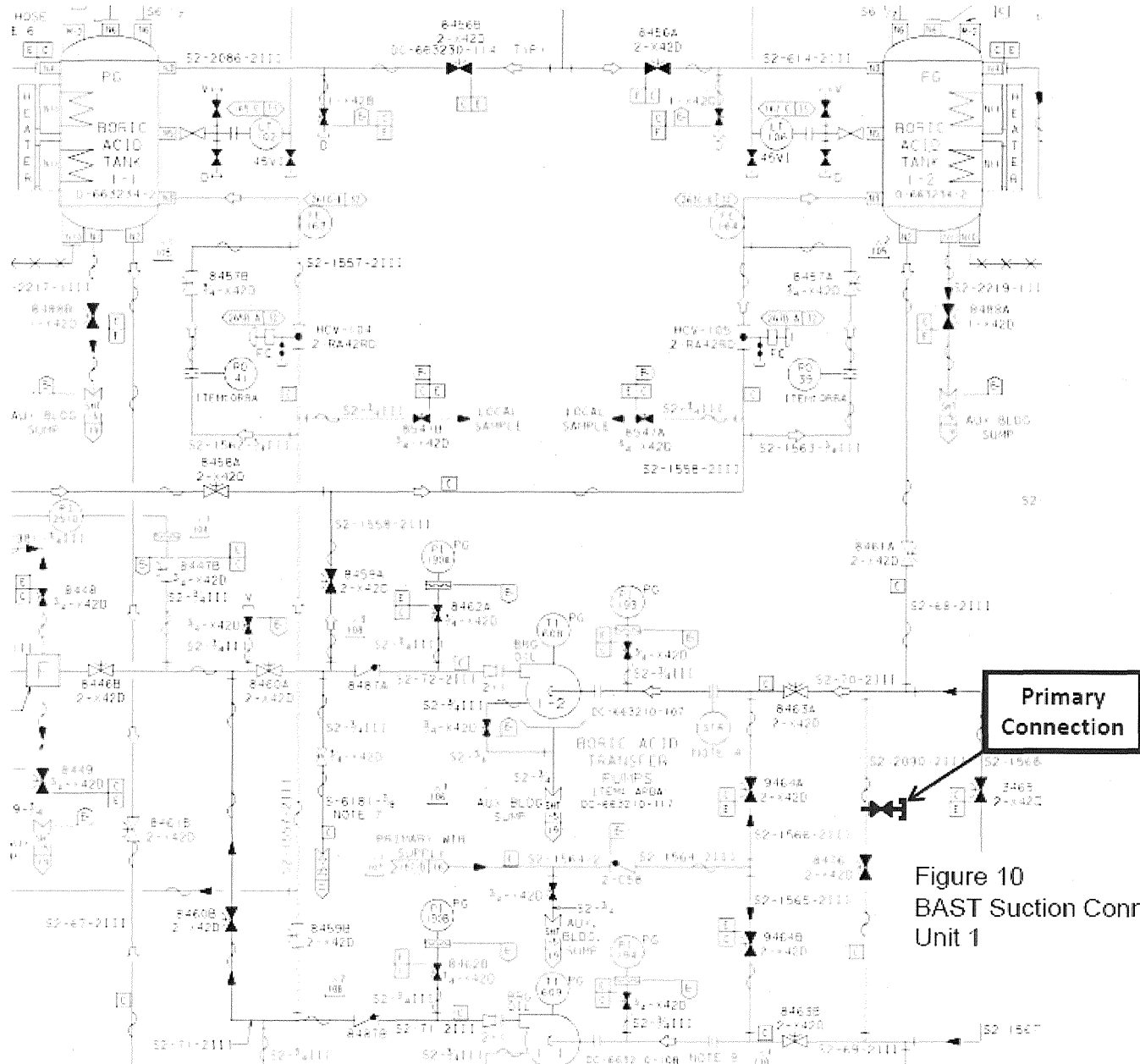


Figure 10  
BAST Suction Connection Point  
Unit 1

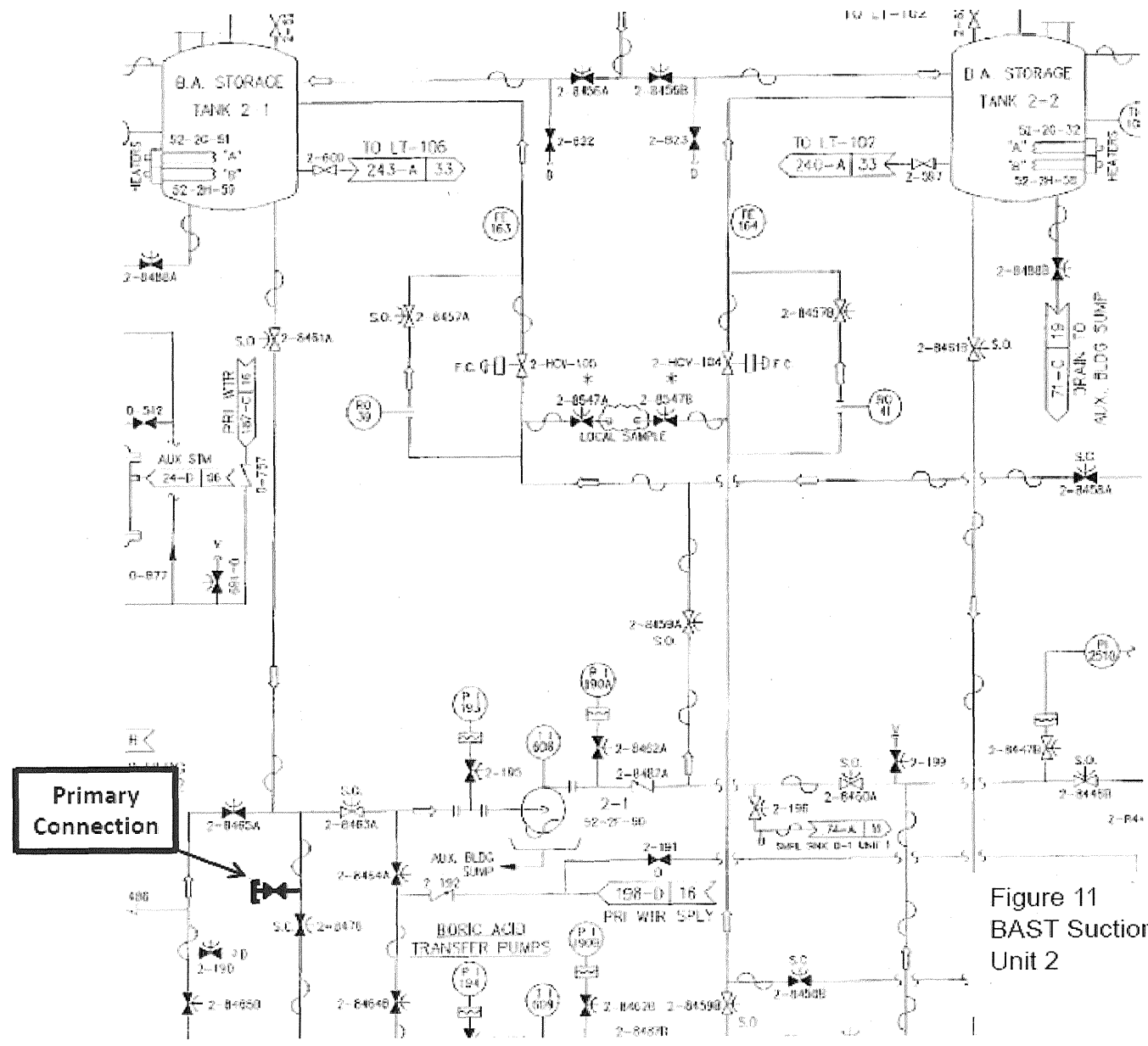


Figure 11  
BAST Suction Connection Point  
Unit 2