



August 22, 2013

PG&E Letter DCL-13-080

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 Reliable
Spent Fuel Pool Instrumentation (Order Number EA-12-051)

References:

1. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012
3. PG&E Letter DCL-12-028, "Pacific Gas and Electric Company's Answer to March 12, 2012, Commission Order Modifying License with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated March 28, 2012
4. PG&E Letter DCL-13-011, "Pacific Gas and Electric Company's 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 February 27, 2013
5. 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 License with Regard to Reliable Spent Fuel pool Implementation (Order Number EA-12-051)," dated July 18, 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 have a reliable indication of the water level in associated spent fuel pools (SFPs). 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 consent to Reference 1. Reference 4 provided PG&E's overall integrated plan. Reference 5 provided PG&E's response to a request for additional information regarding the overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. 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

crlb/SAPN 50465912-12

Enclosure

cc: Diablo Distribution

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**Pacific Gas and Electric Company's First Six-Month Status Report
for the Implementation of Order EA-12-051**

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.]), which includes a description of how compliance with the requirements described in Reference 2, Attachment 2 will be achieved. This enclosure provides an update of milestone accomplishments since submittal of Reference 1, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

2 Milestone Accomplishments

The following milestones have been completed since the development of the OIP (Reference 1) and are current as of July 31, 2013:

On July 18, 2013, PG&E responded to a Nuclear Regulatory Commission (NRC) request for additional information (RAI) regarding the OIP for reliable spent fuel pool (SFP) instrumentation (Reference 3).

In addition, commencement of Unit 1 and Unit 2 engineering and design has been completed.

3 Milestone Schedule Status

The following table provides an update to the milestone schedule. It provides the activity status of each item, and whether the expected completion date has changed. The dates are subject to change as design and implementation details are developed.

There were no changes to the original target completion dates.

Milestone	Original Target Completion Date	Activity Status	Target Completion Date Changes
Submit 60-day progress report	10/2012	Complete	
Submit overall integrated plan	2/2013	Complete	
Submit six-month updates			
Update 1	8/2013	Complete	
Update 2	2/2014	Not started	
Update 3	8/2014	Not started	
Update 4	2/2015	Not started	
Update 5	8/2015	Not started	

Milestone	Original Target Completion Date	Activity Status	Target Completion Date Changes
Update 6	2/2016	Not started	
Update 7	8/2016	Not started	
Request for Additional Information			
Submit RAI response	7/22/2013	Complete	
Commence Unit 1 engineering and design	3/31/13	Complete	
Commence Unit 2 engineering and design	3/31/13	Complete	
Develop Unit 1 design	3/31/14	Started	
Develop Unit 2 design	3/31/14	Started	
Receipt of Unit 1 SFP instruments	12/31/14	Not Started	
Receipt of Unit 2 SFP instruments	12/31/14	Not Started	
Complete Unit 1 SFP instrumentation procedures and training	10/29/15	Not Started	
Complete Unit 2 SFP instrumentation procedures and training	5/31/16	Not Started	
Unit 1 SFP instruments operational	10/29/15	Not Started	
Unit 1 SFP instruments operational	5/31/16	Not Started	

4 Changes to Compliance Method

The following identifies a change to Reference 1 and the reason for the change. The change meets applicable NEI 12-02 compliance methods.

Change 1 – Key SFP Water Levels

Corrected SFP Level 1 from 133 feet to 134 feet 5 inches, which is consistent with PG&E's response to an NRC RAI pertaining to reliable SFP instrumentation (Reference 3).

5 Need for Relief and Basis for the Relief

PG&E expects to comply with the implementation date in the Order. No relief is being requested at this time.

6 Open Items from Overall Integrated Plan

None

7 Open Items from the Request for Additional Information

PG&E submitted a response to an RAI regarding the reliable SFP instrumentation OIP (Reference 3). In its response, PG&E committed to provide a status update of the information necessary to complete its response to the RAIs.

The following provides a summary and status of the RAI open items.

RAI-2

The specific locations of the probes will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

RAI-3

- (1) Final dimensions of the pedestal and bracket will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

- (2) Final dimensions of the bracket will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

RAI-7

- (1) An estimate of the expected instrument channel accuracy under normal and beyond-design-basis conditions will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

- (2) The calibration procedure, and the methodology and basis for establishing both the criteria indicating the need for recalibration, and the acceptance criterion to be used with the procedure, will be established during the design verification phase. The methodology for defining these criteria will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

RAI-8

- (1) Details of the capabilities and provisions of the level instrumentation for periodic calibration and testing will be established during the detailed design phase. A description of these features and the way they will support in-situ testing will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

- (2) A description of how the instrument channel design provides for routine in-situ testing and calibration will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

- (3) Details of functional checks and instrument channel calibrations will be determined during the detailed design phase. A description of how functional checks and calibration tests will be performed, and the frequency at which they will be conducted, will be provided in the six-month update following completion of detailed design. An explanation of how these surveillances will be incorporated into the plant surveillance program will be included.

Status: Detailed design has been completed.

- (4) The preventative maintenance tasks required to be performed during normal operation, and the planned surveillance intervals will be determined during the detailed design phase. A description of these tasks and intervals will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

RAI-10

A list of the operating (both normal and abnormal response) procedures, calibration/test procedures, maintenance procedures, and inspection procedures will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

RAI-11

- (1) PG&E will provide a description of the maintenance and testing program, and a description of the plans for ensuring that necessary channel checks, functional tests, periodic calibration, and maintenance will be conducted for the level measurement system and its supporting equipment. The descriptions will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

- (2) PG&E will implement measures to minimize the possibility of either the primary or backup channel being out of service for an extended period. Sufficient spares, components, and materials will be maintained to be able to repair or replace defective components in a short time. Descriptions of these measures will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

- (3) PG&E will follow the NEI 12-02 guidance with regard to time during which one or more channels may be out of service, including compensatory actions. A description of the compensatory actions will be provided in the six-month update following completion of detailed design.

Status: Detailed design has not been completed.

8 Potential Safety Evaluation Report Impacts

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

9 References

The following references support the updates to the OIP described in this document.

1. PG&E Letter DCL-13-011, "Pacific Gas and Electric Company's 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 February 27, 2013
2. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012

3. 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 License with Regard to Reliable Spent Fuel pool Implementation (Order Number EA-12-051)," dated July 18, 2013