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PG&E Letter DCL-14-077

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 Third 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. 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
3. NRC Letter, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051," dated March 26, 2014.

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1 to Pacific Gas and Electric Company (PG&E) directing PG&E to have a reliable indication of the water level in Diablo Canyon Power Plant's spent fuel pools (SFP). Specific requirements are outlined in Reference 1, Attachment 2.

Pursuant to Reference 1, Section IV, Condition C, PG&E submitted its overall integrated plan (OIP) for reliable SFP instrumentation in Reference 2.

Pursuant to Reference 1, Section IV, Condition C.2, the enclosure to this letter provides PG&E's third six-month status report of its OIP. The enclosure also acknowledges the NRC's transition to an audit methodology for resolution of open or confirmatory items as described by Reference 3.



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 21, 2014.

Sincerely,

Barry Allen  
*Site Vice President*

crib/SAPN 50465912-12

Enclosure

cc: Diablo Distribution  
cc:/enc: Eric E. Bowman, NRC/NRR/DPR/PGCB  
Marc L. Dapas, NRC Region IV Administrator  
Daniel H. Dorman, Acting NRC/NRR Director  
Thomas R. Hipschman, NRC Senior Resident Inspector  
Jessica A. Kratchman, NRC/NRR/JLD/PMB  
Balwant K. Singal, NRR Project Manager

**Pacific Gas and Electric Company's Third 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.]), to achieve compliance with the requirements described in NRC Order EA-12-051 (Reference 2), Attachment 2. This enclosure provides the third 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. This enclosure also provides an update to the status of responses to requests for additional information (RAIs) provided in Reference 3 and PG&E's responses to Reference 4.

**2 Milestone Accomplishments**

No milestones have been completed since the submittal of Reference 8, and are current as of July 31, 2014:

**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.

The target completion dates for developing the Unit 1 and Unit 2 design have been updated to reflect the current design schedule. The revised milestone completion dates do not impact the order implementation date.

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	Complete	
Update 3	8/2014	Complete	
Update 4	2/2015	Not started	
Update 5	8/2015	Not started	
Update 6	2/2016	Not started	
Update 7	8/2016	Not started	

Milestone	Original Target Completion Date	Activity Status	Target Completion Date Changes
July 3, 2013 Request for Additional Information			
Submit 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	1/31/15
Develop Unit 2 design	3/31/14	Started	1/31/15
Receipt of Unit 1 spent fuel pool (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**

None

**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 and Responses to Requests for Additional Information**

PG&E submitted DCL-13-073 (Reference 3) in response to an NRC RAI (Reference 6). In its response, PG&E committed to provide a status update of the information necessary to complete its response to the RAIs.

The NRC's Interim Staff Evaluation (ISE) (Reference 4) requested PG&E to provide responses to RAIs in the six-month status updates as they become available, but no later than April 30, 2015.

Finally, an NRC Letter (Reference 9) announced the NRC's transition to an audit based review process of utility responses to Order EA-12-051. In addition to announcing the transition to an audit based review process, the audit plan also notified each licensee participating in the audit not to formally submit their RAI responses on the docket but instead, put their responses and any other supporting information on their ePortals by the date identified in their ISE to support the Staff's review process. PG&E will provide a status of the remaining Open Items and responses to RAIs, described in Reference 8, as they become available, but no later than April 30, 2015.

## **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 Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated July 18, 2013
4. NRC Letter, "Diablo Canyon Power Plant, Unit Nos. 1 and 2 – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0963 and MF0964)," dated November 25, 2013
5. PG&E Letter DCL-13-080, "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)," dated August 22, 2013

6. NRC Letter, "Diablo Canyon Power Plant, Unit Nos. 1 and 2 – Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) (TAC Nos. MF0963 and MF0964)," dated July 3, 2013
7. 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
8. PG&E Letter DCL-14-015, "Pacific Gas and Electric Company's Second 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)," dated February 26, 2014
9. NRC Letter, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051," dated March 26, 2014.