



**Pacific Gas and  
Electric Company**

**The Enclosure, Attachment 2 Contains  
Security-Related Information – Withhold Under 10 CFR 2.390**

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October 15, 2015

PG&E Letter DCL-15-119

U.S. Nuclear Regulatory Commission

10 CFR 50.90

ATTN: Document Control Desk  
Washington, D.C. 20555-0001

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

Response to NRC Request for Additional Information - National Fire Protection  
Association Standard 805

References

- 1) PG&E Letter DCL-13-065, "License Amendment Request 13-03, License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition)," dated June 26, 2013
- 2) NRC Letter, "Diablo Canyon Power Plant, Units 1 and 2 - Request for Additional Information Re: License Amendment Request to Adopt National Fire Protection Association Standard 805 (TAC Nos. MF2333 and MF2334)," dated July 31, 2014
- 3) PG&E Letter DCL-14-085, "Sixty-Day Response to NRC Request for Additional Information – National Fire Protection Association Standard 805," dated September 29, 2014
- 4) PG&E Letter DCL-14-098, "Ninety-Day Response to NRC Request for Additional Information – National Fire Protection Association Standard 805," dated October 29, 2014
- 5) PG&E Letter DCL-14-110, "One Hundred Twenty Day Response to NRC Request for Additional Information – National Fire Protection Association Standard 805," dated November 26, 2014

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Document Control Desk  
October 15, 2015  
Page 2

PG&E Letter DCL-15-119

- 6) NRC Email from S. Lingam, Project Manager (NRR/DORL/LPL4-1), "Diablo Canyon, Units 1 and 2 - Requests for Additional Information (RAIs) for Fire Protection (NFPA-805) License Amendment Request (LAR) (TAC Nos. MF2333 and MF2334)," dated February 4, 2015
- 7) PG&E Letter DCL-15-031, "Proposed Commitment for Response to NRC Request for Additional Information Regarding Submittal Date of the Integrated Analysis – National Fire Protection Association Standard 805," dated February 25, 2015
- 8) PG&E Letter DCL-15-032, "Response to NRC Request for Additional Information - National Fire Protection Association Standard 805," dated February 25, 2015

Dear Commissioners and Staff:

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted License Amendment Request (LAR) 13-03 to adopt National Fire Protection Association Standard 805 (NFPA 805).

In Reference 2, the NRC provided a request for additional information (RAI) as part of an audit performed at Diablo Canyon Power Plant during the week of July 14, 2014.

In Reference 3, 4, and 5, PG&E submitted 60-day, 90-day, and 120-day RAI responses, respectively, to the NRC RAI – NFPA 805 regarding LAR 13-03.

Probabilistic Risk Assessment (PRA) RAI 03 and follow-on RAI questions (Reference 6) were discussed in draft form in teleconferences with the NRC, along with the associated response submittal dates, on January 21, 2015, and on February 4, 2015.

In Reference 6, the NRC emailed PG&E follow up RAIs to PG&E's 120-day RAI responses (Reference 5) regarding LAR 13-03.

On January 29, 2015, PG&E held a conference call with the NRC Fire Protection and PRA Branch Chiefs, NRC NFPA 805 technical personnel, and the NRC Project

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Document Control Desk  
October 15, 2015  
Page 3

PG&E Letter DCL-15-119

Manager for Diablo Canyon Power Plant (DCPP). The call discussed the schedule for the License Amendment and Safety Evaluation (LA/SE) for DCPP.

In Reference 7, PG&E submitted a letter to the NRC proposing a regulatory commitment to revise the submittal date of PRA RAI-03 response to the NRC RAI – NFPA 805 regarding LAR 13-03. PG&E provided the following commitment:

“PG&E will provide the response to PRA RAI 3 eight weeks following verification that seal testing data conforms to the Westinghouse Topical report and NRC acceptance of the Westinghouse Topical report for quantitative use in FPRA. Concurrent with the PRA RAI 3 submittal, PG&E will submit a frozen FPRA, updated LAR tables, and a transition report. The transition report will include a revised schedule for an implementation period of 12 months from receipt of the LA/SE.”

In Reference 8, PG&E submitted follow up 120-day (Reference 5) RAI responses to the NRC RAI – NFPA 805 regarding LAR 13-03.

Enclosed are PG&E's responses to PRA RAI-03 and PRA RAI-01.h.01. Also enclosed are PG&E's follow-up responses to RAIs previously submitted that were impacted by the results of the PRA RAI-03 integrated analysis.

Attachment 1 of this enclosure includes a list of acronyms used in this response for convenience. Attachment 2 of this enclosure includes an update to Attachments C, D, G, and W. Attachments C, D, G, and W of Enclosure 2 contain security-related information and should be withheld under 10 CFR 2.390. Attachment 3 of this enclosure includes updates to the LAR as a result of updated analyses, editorial changes, and reference corrections.

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. Philippe Soenen at 805-545-6984.

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Document Control Desk  
October 15, 2015  
Page 4

PG&E Letter DCL-15-119

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

Executed on October 15, 2015.

Sincerely,

Barry S. Allen  
*Vice President – Nuclear Services*

mjrm/4557/50709593

Enclosure

cc: Diablo Distribution  
cc/enc: Marc L. Dapas, NRC Region IV  
Thomas P. Hipschman, NRC Senior Resident Inspector  
Siva P. Lingam, NRR Project Manager  
Gonzalo L. Perez, Branch Chief, California Dept of Public Health

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