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21 January 1977

Mr. James R. Tourtellotte
Mr. Dow Davis
Mr. Paul Kiefer
Office of Executive Legal Director
BETH 042
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



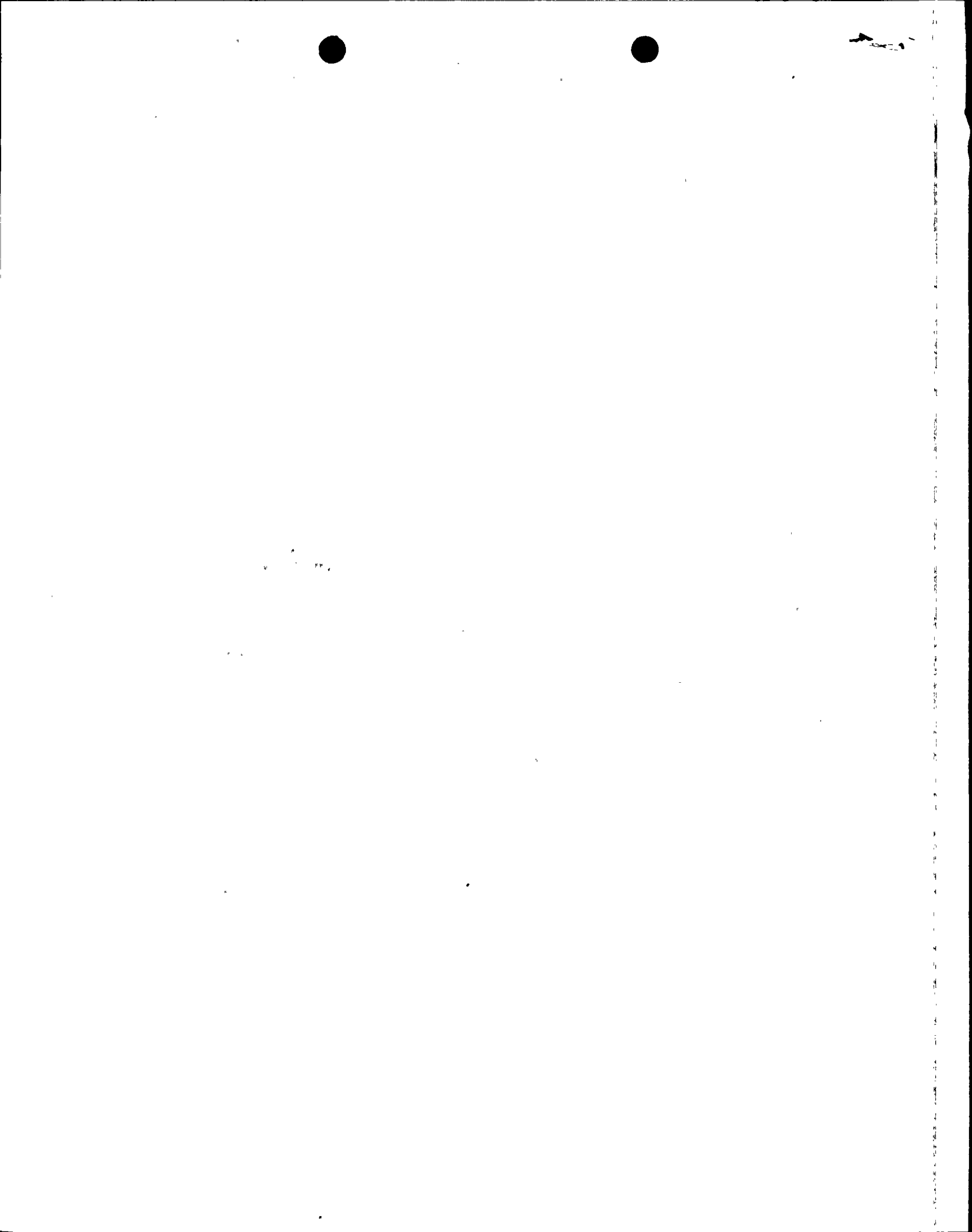
In the Matter of PACIFIC GAS AND ELECTRIC COMPANY
(Diablo Canyon Nuclear Power Plant, Units Nos. 1
and 2) Docket Nos. 50-275 O.L., 50-323 O.L.

Gentlemen:

As we informed you in a letter addressed to the Board a few weeks ago, we plan to add a contention to the Diablo Canyon health and safety proceedings regarding the need for retrofitting the DCNGS. It has come to our attention through releases by the Nuclear Regulatory Commission and reports in the industry press that your agency currently is most interested in the retrofit issue. In fact, we understand that the Commission might adopt a regulation that would require continuous updating of safety information and possible retrofitting of operating nuclear plants.

We have identified several design features of Diablo Canyon that might require retrofitting. These design features met AEC regulations in force at the time the Diablo Canyon construction licenses were issued in 1968 and 1970, but do not meet standards set by current regulations.

In light of the Commission's present concern with the retrofitting issue, before we file our retrofitting contention, we would like to discuss your agency's position and actions on retrofitting at Diablo Canyon. Hopefully, your agency is already addressing some of the design problems we believe require retrofitting. We propose that we arrange



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a conference call within the next few days between ourselves, yourselves, our consultants Messrs. Bridenbaugh, Hubbard and Minor, and NRC Project Manager Allison to discuss the retrofit matter.

We look forward to talking with you soon.

Yours sincerely,



Brent N. Rushforth



James Geocaris

cc: Diablo Canyon service list
MHB Technical Associates

