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SUBJECT: Agrees w/State of CA 940802 request to postpone full-scale emergency preparedness exercise from 1995 to 1996. Reasons util supports State of CA request listed.

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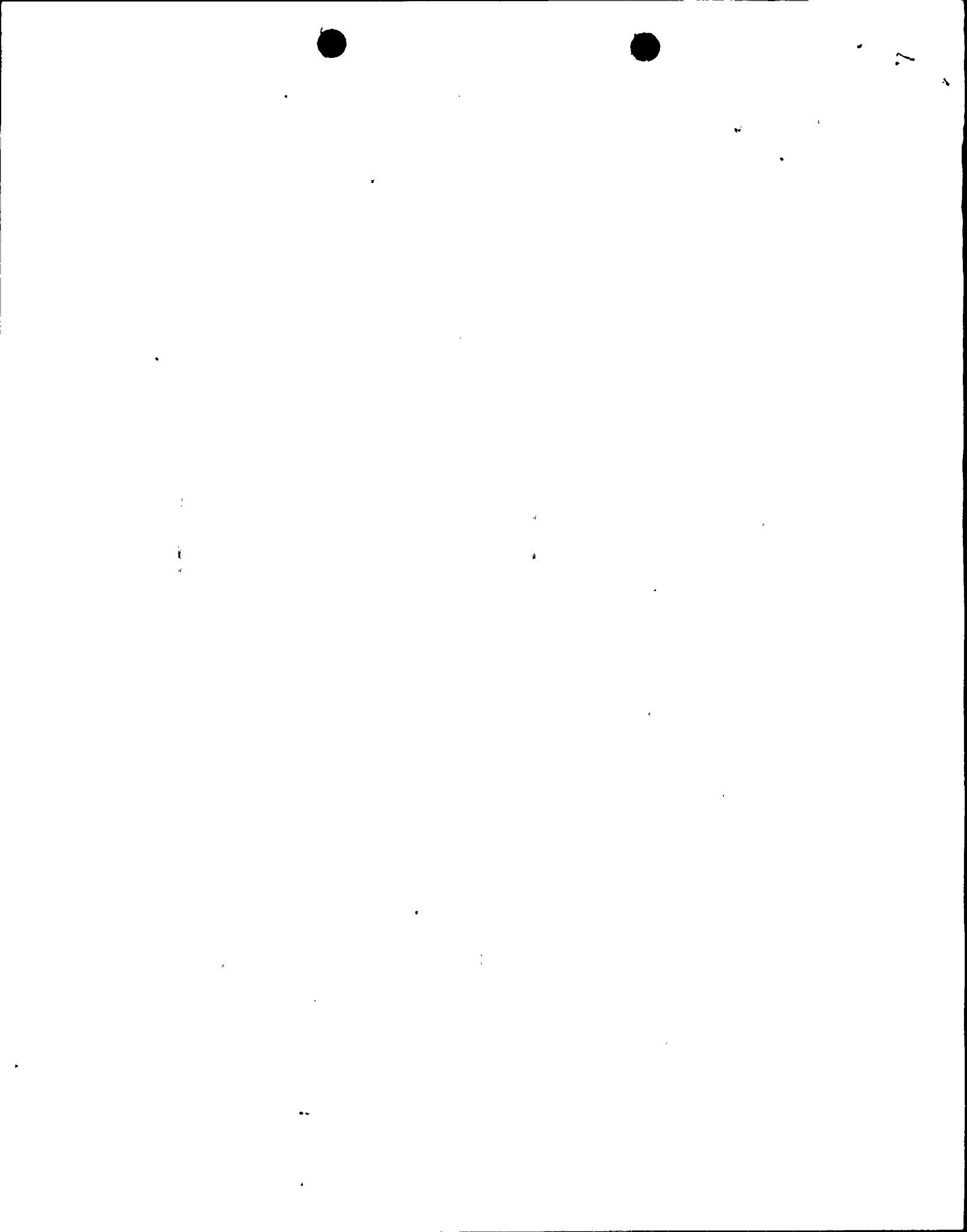
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October 17, 1994

PG&E Letter DCL-94-204

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Request to Postpone the Full-Scale Emergency Preparedness Exercise
from 1995 to 1996

Gentlemen:

On August 2, 1994, the State of California requested the Federal Emergency Management Agency (FEMA) to grant a one-year extension in the current Radiological Emergency Preparedness Program six-year exercise cycle for Diablo Canyon Power Plant (DCPP). The one-year extension would postpone to 1996 the biennial, full-scale emergency preparedness exercise for DCPP currently scheduled for 1995. The one-year extension to the cycle would also change the biennial, full-scale emergency preparedness exercise schedule for DCPP to even-numbered years.

PG&E agrees with the State's request. To support this position, PG&E requests NRC approval to postpone until 1996 the biennial, full-scale emergency preparedness exercise currently scheduled for DCPP in 1995. Approval of this request would change the biennial NRC emergency preparedness inspection cycle to even-numbered years

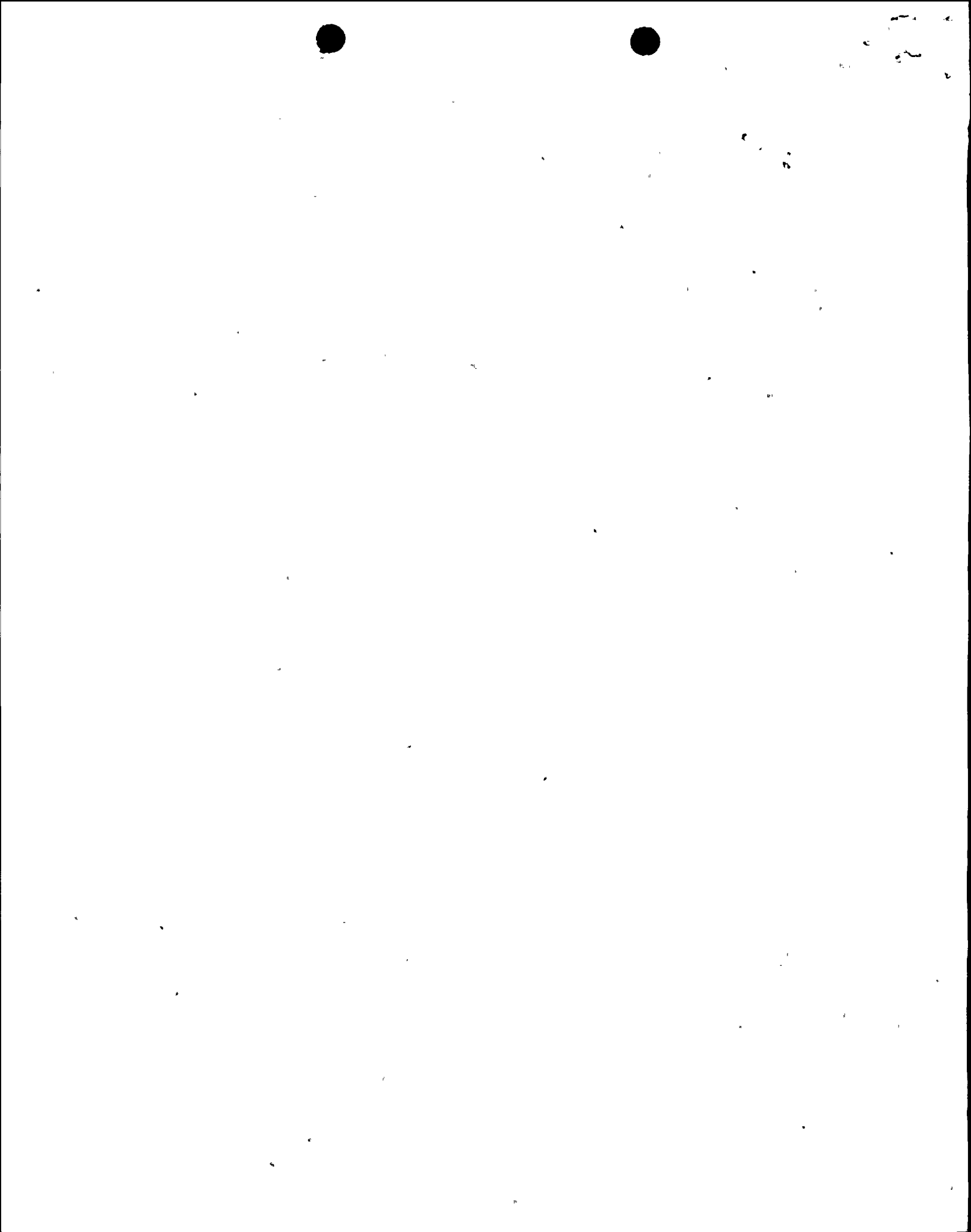
The State of California request was discussed during the California Office of Emergency Services Nuclear Power Preparedness Annual Meeting in Morro Bay, California, on May 24-26, 1994. Representatives of the NRC, FEMA, State and local agencies, and PG&E all agreed that the change would be beneficial.

PG&E supports the State's request for the following reasons:

- Currently PG&E and Southern California Edison, the two utilities in California with nuclear power plants, conduct their biennial, full-scale emergency preparedness exercises in odd-numbered years (and generally within a month of each other). This schedule requires the State to simultaneously

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support local agencies at both plant sites, thereby creating a hardship for the State in terms of manpower and finances. By changing to staggered emergency preparedness exercises, the State would participate in one exercise every year, rather than two exercises every other year. With this change, the State could better allocate its resources in planning and exercising its plans and in supporting the local agencies at the plant sites.

- With staggered, biennial, full-scale emergency preparedness exercises, the offsite agencies at San Onofre Nuclear Generating Station could better serve as controller/evaluators for DCPD and vice versa. Currently, it is very difficult for the offsite agencies at each site to assist each other because the exercise dates for the plants often conflict. Evaluating each other has proven to be beneficial to both sites.
- The FEMA would also benefit from staggered, biennial, full-scale emergency preparedness exercises since its evaluation effort for California would be spread out more evenly, i.e., one exercise every year, rather than two exercises every other year.
- FEMA and the NRC have determined that the one-year extension of the exercise cycle will not affect the ability of San Luis Obispo County to adequately protect public health and safety in the event of a radiological emergency at DCPD.

Based on discussions with NRC Region IV emergency planning inspection personnel, and assuming the NRC grants PG&E's request stated above, PG&E concludes that it is not necessary to obtain NRC concurrence on establishing an exercise date for 1995 (non-full-scale exercise) since the next NRC inspection cycle for the biennial, full-scale emergency preparedness exercise would start in 1996.

Sincerely,



Gregory M. Rueger

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