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SUBJECT: Provides PG&E commitment to convert to improved STS.

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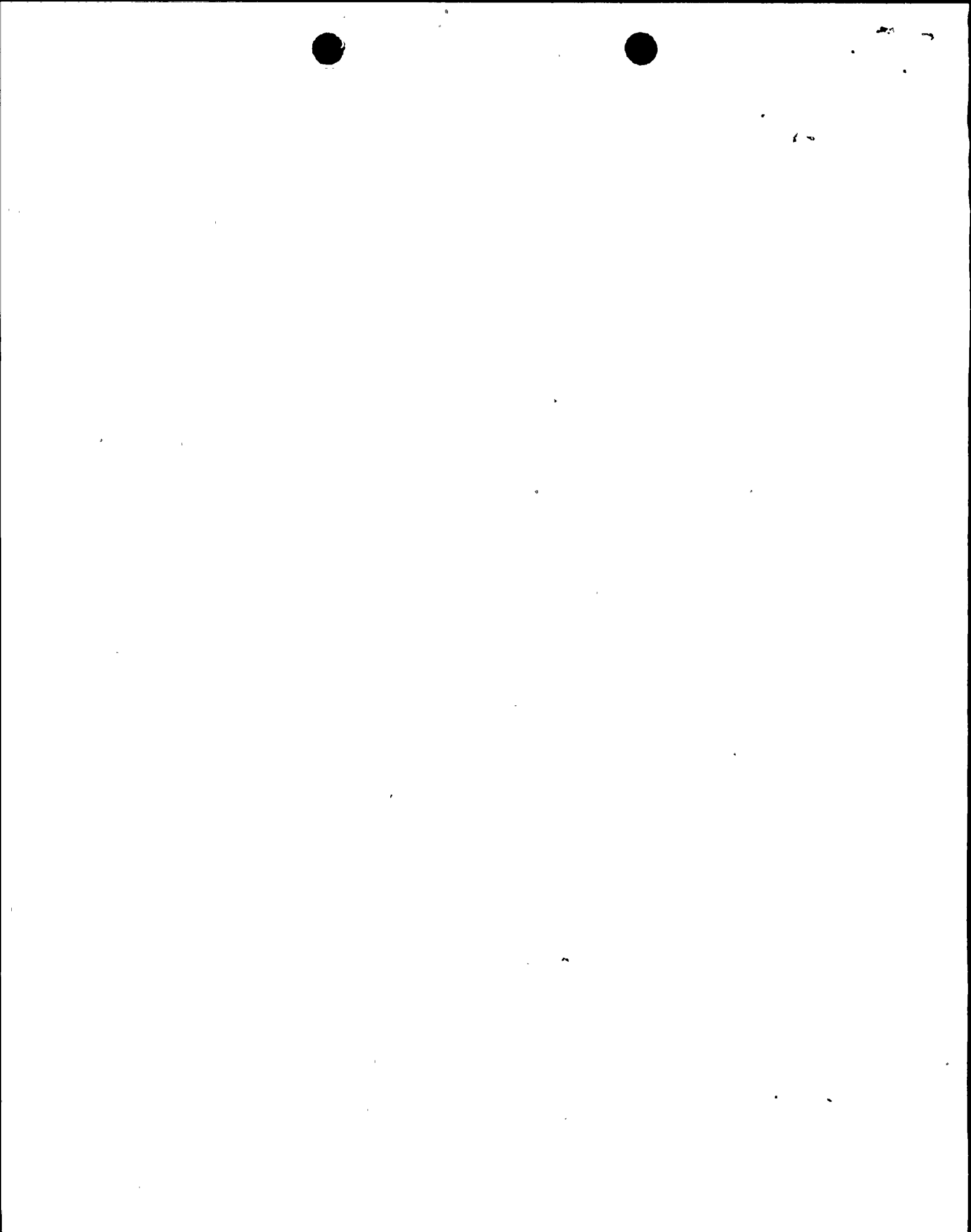
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December 19, 1995

PG&E Letter DCL-95-275

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Conversion to Improved Standard Technical Specifications

Gentlemen:

This letter provides PG&E's commitment to convert to the improved Standard Technical Specifications (STS). PG&E will be using the Technical Specification (TS) conversion process discussed at the meeting on November 14, 1995, between members of the NRC staff and representatives of TU Electric, Pacific Gas and Electric Company, Wolf Creek Nuclear Operating Corporation, and Union Electric Company (hereafter the "Group"). The NRC staff has stressed the importance of converting to the improved STS. The staff has also stressed the value of licensees working together to increase standardization and to reduce NRC resources needed to act on licensing matters. In response to these recommendations and in recognition of the benefits that result, PG&E has chosen to work jointly with the Group in the conversion of the Diablo Canyon Power Plant (DCPP) TS.

The Group will jointly develop a full conversion submittal based on NUREG-1431, Rev. 1. Submittals for all four utilities will address generic features of the plants' TS in an identical fashion, will include applicability matrices to identify differences in the TS submittals, and will be docketed at approximately the same time (target date of December 1996). The Group anticipates a four to six month review by the NRC, with the resultant review cost savings for each utility as discussed at the meeting.

Our commitment to proceed with conversion to the improved STS is based on the following understandings reached in our November 14, 1995, meeting:

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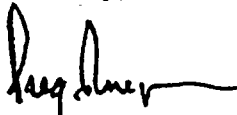
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1. Each plant may maintain its licensing basis, as established by its existing TS, in the conversion process. With appropriate justification, a given utility may optimize its TS based on another Group member's existing TS. Our goal is to maximize commonality.
2. Plant-specific License Amendment Requests (LARs) will continue to receive timely consideration during the conversion process, including the NRC review cycle. The Group will screen and limit these to the extent possible but the NRC recognizes that LARs in support of reloads and those representing either safety issues or significant cost savings will continue to be given prompt consideration. Where possible, LARs submitted during the next 18 months will be jointly developed and submitted by the Group to conserve NRC review resources.
3. The effective date for new shutdown or fuel cycle frequency surveillance requirements, imposed as a result of the conversion, will be the first refueling outage occurring after the implementation of the individual plant's TS conversion amendment.
4. A single point of contact will be established within the projects and technical branches at NRR. Likewise, the Group's single point of contact is Mr. Donald R. Woodlan of TU Electric.
5. Given our commitment to conversion, enforcement discretion will not be denied or delayed on the basis that conversion of the DCPD TS has not been completed. Each request for such discretion will continue to be judged on its own merit.

If you have any questions on the above, please contact the Group Chairman, Mr. Donald R. Woodlan of TU Electric, at (214) 812-8225.

Sincerely,



Gregory M. Rueger



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cc: Edgar Bailey, DHS
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Diablo Distribution

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