

December 29, 2020

PG&E Letter DCL-20-108

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Use of Risk-Informed Evaluation Methodology to Address Open Phase Condition

References:

1. PG&E Letter DCL-19-097, "Schedule Extension for Full Implementation of Open Phase Detection System," dated December 9, 2019 (ML19343B177)
2. Nuclear Energy Institute Open Phase Condition Initiative, Revision 3, dated June 2019 (transmitted to NRC under NEI letter dated June 6, 2019, Douglas E. True to Ho Nieh, Jr., re: "Industry Initiative on Open Phase Condition, Revision 3") (ML19163A176)
3. PG&E Letter DCL-14-118, "Supplement to Response to NRC Request for Additional Information Regarding Response to NRC Bulletin 2012-01," dated December 22, 2014 (ML14356A571)

Dear Commissioners and Staff:

Reference 1 noted that Pacific Gas and Electric Company (PG&E) would inform the NRC if PG&E opted to implement the risk-informed evaluation methodology in Reference 2 to address potential open phase conditions (OPCs) at Diablo Canyon Power Plant (DCPP). PG&E has decided to implement that methodology. Implementation will be completed by March 31, 2021.

This submittal revises PG&E's OPC commitment, as originally made in Reference 3. The enclosure restates the superseded and revised commitments for clarity.

If you have any questions or require additional information, please contact Mr. Jim Morris, DCPD Regulatory Services Manager, at 805-545-4609.

Sincerely,

A handwritten signature in black ink, appearing to read "Paula Gerfen". The signature is fluid and cursive, with the first name "Paula" being more prominent than the last name "Gerfen".

Paula Gerfen
Site Vice President

jmsp/51068100-02

Enclosure

cc: Donald R. Krause, NRC Senior Resident Inspector
Samson S. Lee, NRC Project Manager
Scott A. Morris, NRC Region IV Administrator
Diablo Canyon Distribution

Regulatory Commitment Summary

Superseded Commitment – quoted from Reference 3 with dates (in brackets) from Reference 1:

PG&E is committed to the following schedule for implementation of the Open Phase Detection system:

- Unit 1 ... [t]rip functions will be enabled by [December 31, 2020].
- Unit 2 ... [t]rip functions will be enabled by [December 31, 2020].

Revised Commitment:

PG&E will implement the risk-informed evaluation methodology in Reference 2 (Nuclear Energy Institute Open Phase Condition Initiative, Revision 3, dated June 2019, ML19163A176) in conjunction with NEI 19-02, Revision 1, to address potential open phase conditions (OPCs) at Diablo Canyon Power Plant (DCPP). Implementation will be completed by March 31, 2021.