



**Pacific Gas and
Electric Company**

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October 29, 1999

PG&E Letter DCL-99-141

U.S. Nuclear Regulatory Commission
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
Requirements for Continuous Fire Watches for Inoperable Fire Barriers

Dear Commissioners and Staff:

On October 21, 1998, in DCL-98-140, "Revision to Requirements for Continuous Fire Watches for Inoperable Fire Barriers," PG&E requested NRC review and approval for use of a 15 minute roving fire watch, with specified restrictions, to provide the equivalent level of fire protection as a continuous fire watch. PG&E stated in DCL-98-140 that it had undertaken an extensive walkdown evaluation and reverification project for Diablo Canyon Power Plant fire barriers and penetrations. During the evaluation and reverification, PG&E conservatively declared all fire barriers (Appendix R and Appendix A) inoperable. In DCL-98-140, PG&E indicated that until the completion of the project, it intended to use a 15 minute roving fire watch, with specified restrictions, to provide the equivalent level of fire protection as a continuous fire watch. PG&E also indicated in DCL-98-140 that after the penetration seal program was completed, it did not anticipate the need to use the 15 minute roving fire watches for inoperable fire barriers.

Following submittal of DCL-98-140, PG&E determined that it wanted to retain the flexibility of the use of a 15 minute roving fire watch being equivalent to a continuous fire watch for selected areas. Therefore, PG&E is submitting for NRC review and approval, this follow-up letter to request permanent implementation of the 15 minute roving fire watch allowance for certain fire zones in the plant.

The bases for permanently implementing the 15 minute roving fire watch allowance is provided in DCL-98-140.

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Sincerely,

A handwritten signature in black ink, appearing to read "D. H. Oatley". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

David H. Oatley

cc: Edgar Bailey, DHS
Steven D. Bloom
Ellis W. Merschoff
David L. Proulx
Diablo Distribution

PTN/2057