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June 7, 2012

PG&E Letter DCL-12-061

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk 11555 Rockville Pike Rockville, MD 20852 10 CFR 50.54(f)

Docket No. 50-275, OL-DPR-80 Docket No. 50-323, OL-DPR-82 Diablo Canyon Units 1 and 2 <u>Pacific Gas and Electric Company's Response to NRC Request for Information</u> <u>Pursuant to 10 CFR 50.54(f) Regarding Emergency Preparedness Aspects of</u> <u>Recommendation 9.3 of the Near-Term Task Force Review of Insights from the</u> <u>Fukushima Dai-Ichi Accident</u>

Reference:

 NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) staff issued the referenced letter. Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

In accordance with the referenced letter, Pacific Gas and Electric Company (PG&E) submitted its alternative course of action for providing the requested information in PG&E Letter DCL-12-048, "60-Day Response to NRC Letter, 'Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident,' dated March 12, 2012," dated May 9, 2012. The alternative course of action included revised due dates and the basis for those dates. As described in PG&E's alternative course of action, Enclosure 1 of this letter provides PG&E's response to Communications Request #2 and Staffing Requests #3, 4, and 5, from Enclosure 5 of the referenced letter.



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PG&E is making regulatory commitments (as defined by NEI 99-04) in Enclosure 2 of this letter. This letter includes no revisions to existing regulatory commitments.

If you have any questions, or require additional information, please contact Mr. Jearl Strickland at (805) 781-9785.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 7, 2012.

Sincerely,

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Edward D. Halpin Senior Vice President – Chief Nuclear Officer

ckf6/SAPN 50465913 Enclosures

cc: Diablo Distribution

cc:/enc: Elmo E. Collins, NRC Region IV Eric J. Leeds, NRC Director, Office of Nuclear Reactor Regulation Michael S. Peck, NRC, Senior Resident Inspector Joseph M. Sebrosky, NRR Project Manager

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#### PG&E Response to NRC Required Information

#### NRC Requested Information: Communication Request #2

Addressees are requested to describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

#### PG&E Response to NRC Requested Information: Communication Request #2

#### Actions Taken or Planned:

Action	Estimated Completion Date
ACTIONS PLANNED	Dale
Evaluate enhancements to existing communications systems power supplies.	10/31/12
Provide an implementation schedule as required by Communications Request #3 which will include the results of the evaluation of existing communications systems power supplies.	10/31/12
The equipment identified below is currently scheduled to be delivered by October 2012. Upon delivery of the equipment, PG&E will develop and provide the NRC a detailed schedule for implementing this equipment.	10/31/12 (Reference PG&E Letter DCL-12-048)
<ul> <li>ACTIONS TAKEN</li> <li>Purchased the following communications equipment: <sup>(a)</sup></li> <li>3 communications trailers with generators (2 onsite and 1 official)</li> </ul>	Complete
<ul> <li>1 offsite)</li> <li>3 satellite phones with network capability</li> <li>80 dual band hand held radios</li> <li>75 single band hand held radios</li> </ul>	

<sup>(a)</sup> In response to INPO Event Report 11-4, PG&E conducted an analysis of existing communications systems and equipment and developed an action plan to address station-identified areas for improvement. A component of that action plan was the procurement of new communications systems equipment.

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### NRC Requested Information: Staffing Request #3

Identify how the augmented staff would be notified given degraded communications capabilities.

## PG&E Response to NRC Requested Information: Staffing Request #3

Method	Description
Automatic Response	PG&E will revise procedures to include degraded communications capabilities, such that Emergency Response Organization members will automatically respond to their assigned facilities or a designated staging area when made aware of an area-wide disaster (e.g. loss-of- grid, natural or man-made disaster, etc.). These procedures will be revised by December 31, 2012.

#### NRC Requested Information: Staffing Request #4

Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

#### PG&E Response to NRC Requested Information: Staffing Request #4

The following methods of access to the site are available. After a widespread large scale natural event, an assessment will be made to determine which methods of access are available to expeditiously transport personnel to the site.

Method	Description
Roadway	The preferred route to access the site is south along the paved site access road. If the southern route is impassable or unsafe, access to the site is available via a dirt road through Montana de Oro State Park.
Air	Diablo Canyon Power Plant has access to helicopter companies for emergency transport of personnel to the site. Military helicopters may be available for emergency use. The
	closest military helicopter is at Vandenberg Air Force Base.
	PG&E owns and maintains two marine craft and a dock
Sea	located at the site. These vessels may be used if available following a beyond design basis natural event to supplement air transport in the event road access is unavailable.

# NRC Requested Information: Staffing Request #5

Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

# PG&E Response to NRC Requested Information: Staffing Request #5

# Actions Taken or Planned:

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Action	Estimated
	Completion Date
ACTIONS PLANNED:	
As discussed in the response to Staffing No. 3, PG&E will revise	12/31/12
procedures to include degraded communications capabilities.	

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# **Regulatory Commitments**

PG&E is making the following regulatory commitments (as defined by NEI 99-04) in this submittal:

Commitment	Due Date
Evaluate enhancements to existing communications systems	10/31/12
power supplies.	
Provide an implementation schedule as required by	10/31/12
Communications Request #3 which will include the results of the	
evaluation of existing communications systems power supplies.	
PG&E will revise procedures to include degraded	12/31/12
communications capabilities, such that Emergency Response	
Organization members will automatically respond to their	
assigned facilities or a designated staging area when made	
aware of an area-wide disaster (e.g. loss-of-grid, natural or man-	
made disaster, etc.).	