



October 25, 2012

PG&E Letter DCL-12-106

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

10 CFR 50.4

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Pacific Gas and Electric Company's Initial Status Report in Response to
March 12, 2012, Commission Order Modifying Licenses with Regard to
Requirements for Reliable Spent Fuel Pool Instrumentation
(Order Number EA-12-051)

References:

1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Requirements of Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Pacific Gas and Electric Company (PG&E). Reference 1 was immediately effective and directs PG&E to have a reliable indication of the water level in associated spent fuel storage pools. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012.

The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms PG&E has received Reference 2 and is in the process of evaluating the guidance for the purpose of providing a reliable indication of the water level in associated spent fuel storage pools as described in Attachment 2 of Reference 1.

During this reporting period, PG&E has been identifying resources and initiating project plans including development of milestones, to ensure compliance with Reference 1.



For the next 6 months, PG&E plans to develop and submit the overall integrated plan.

At this time, PG&E has not encountered technical difficulties that could affect its ability to provide the February 28, 2013, submittal.

Project milestones scheduled through completion of installation and testing:

- 1) A project milestones schedule will be provided with the overall integrated plan by February 28, 2013.
- 2) Implementation of the order will be completed for Unit 1 prior to startup from Unit 1 refueling outage 19 (Fall 2015).
- 3) Implementation of the order will be completed for Unit 2 prior to startup from Unit 2 refueling outage 19 (Spring 2016).

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

If you have any questions, or require additional information, please contact Mr. Terence L. Grebel at (805) 545-4160.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 25, 2012.

Sincerely,

Edward D. Halpin
Senior Vice President – Chief Nuclear Officer

ckf6/SAPN 50465912
Enclosure

cc: Diablo Distribution
cc:/enc: Elmo E. Collins, NRC Region IV
Steven R. Jones, NRC, NRR/DSS/SBPB
Eric J. Leeds, NRC Director, Office of Nuclear Reactor Regulation
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Joseph M. Sebrosky, NRR Project Manager

Regulatory Commitments

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

Commitment	Due Date
For the next 6 months, PG&E plans to develop and submit the overall integrated plan.	February 28, 2013
A project milestones schedule will be provided with the overall integrated plan by February 28, 2013.	February 28, 2013
Implementation of the order will be completed for Unit 1 prior to startup from Unit 1 refueling outage 19 (Fall 2015).	Fall 2015
Implementation of the order will be completed for Unit 2 prior to startup from Unit 2 refueling outage 19 (Spring 2016).	Spring 2016