



October 25, 2012

PG&E Letter DCL-12-105

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 Mitigation Strategies for Beyond-Design-Basis External
Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 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 develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. 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 establishing mitigation strategies to maintain or restore core, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- (1) Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- (2) A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- (3) Resources are being identified and project plans initiated, 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 50466122

Enclosure

cc: Diablo Distribution

cc:/enc: Eric E. Bowman, NRC, NRR/DPR/PGCB

Elmo E. Collins, NRC Region IV

Jessica A. Kratchman, NRC, NRR/JLD/PMB

Eric J. Leeds, NRC Director, Office of Nuclear Reactor Regulation

Eileen M. Mckenna, NRC, NRO/DSRA/BPTS

Laura H. Micewski, NRC, Senior Resident Inspector

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:

Commitments	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