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February 21, 2013

PG&E Letter DCL-13-012

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk 11555 Rockville Pike Rockville, MD 20852

Docket No. 50-275, OL-DPR-80 Docket No. 50-323, OL-DPR-82 Diablo Canyon Units 1 and 2 <u>30-Day Response to Request for Additional Information Regarding the</u> Recommendation 9.3 Communications Assessment

References:

- 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, Accession No. ML12073A348
- NRC Letter, Follow-up Letter on Technical Issues for Resolution Regarding Licensee Communication Submittals Associated with Near-Term Task Force Recommendation 9.3 (TAC No. ME7951), dated January 23, 2013, Accession No. ML13010A162

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) staff issued Reference 1. Enclosure 5 of Reference 1 contains specific Requested Information and Required Responses associated with Near-Term Task Force (NTTF) Recommendation 9.3 for Emergency Preparedness. In accordance with Reference 1, 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, dated May 9, 2012. PG&E submitted the Diablo Canyon Power Plant communications assessment in PG&E Letter DCL-12-110, dated October 29, 2012.

The NRC staff issued Reference 2 to identify technical issues for resolution regarding submittals associated with NTTF Recommendation 9.3.

10 CFR 50.54(f)



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Enclosure 1 of this letter supplements PG&E Letter DCL-12-110 and provides PG&E's response to the technical issues identified in Reference 2.

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. Terence L. Grebel at (805) 545-4160.

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

Executed on February 21, 2013.

Sincerely,

Bary S. All

Barry S. Allen Site Vice President

ckf6/SAPN 50465913 Enclosures

cc: Diablo Distribution cc:/enc: Elmo E. Collins, NRC Region IV Thomas R. Hipschman, NRC, Senior Resident Inspector Eric J. Leeds, NRR Director James T. Polickoski, NRR Project Manager

# PG&E Response to NRC Request for Additional Information

### NRC Generic Technical Issue #1

The staff identified that licensees need to discuss how the power for the equipment analyzed is expected to be available, and how the planned communications enhancements are expected to be maintained. The following areas were identified:

- A. A detailed description of how power will be maintained for (1) planned or potential enhancements to the communications links and (2) existing equipment analyzed to be available.
  - 1. The number of replacement batteries expected to be needed for a 24-hour duration, per the Nuclear Energy Institute (NEI) 12-01 "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities".
  - 2. Generator availability to charge batteries without offsite equipment for a duration of 24 hours.
  - 3. A description of how ancillary equipment supports operations for a 24-hour duration (e.g., adequacy of fuel suppliers for the generators; and the minimum number of battery chargers expected to be necessary).

Enhancement	Additional Information				
Satellite phone	The satellite phone system consists of the following components:				
system	Fixed satellite phones with external antenna				
	Satellite phone "Footballs"				
	Hand held satellite phones				
	Communications trailer				
	<ul> <li>Field monitoring team (FMT) satellite phones</li> </ul>				
	<ul> <li>County sheriff watch commander fixed satellite phone with external antenna</li> </ul>				
	<b>Fixed Satellite Phones with External Antenna</b> As discussed in Pacific Gas and Electric Company (PG&E) Letter DCL-12-110, Enclosure 1, Appendix B, Table 4.1.1, the control room (CR), technical support center (TSC), and emergency operations facility (EOF) each have a fixed satellite phone with an externally mounted antenna. PG&E will provide power from an uninterrupted power supply with 6 hours of back-up power to the CR and TSC fixed satellite phones. Back-up power for the EOF fixed satellite phone is provided by an existing diesel generator (DG) with a 1000-gallon tank that is capable of providing 120 hours of power.				

#### PG&E Response to NRC Generic Technical Issue #1

# PG&E Response to NRC Generic Technical Issue #1

#### Satellite Phone "Footballs"

As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.1, the satellite phone "footballs" have a talk time of 4.5 hours and takes 4 hours to recharge the power supply. The CR and TSC satellite phone "football" rechargers will be powered from portable DGs. While the satellite phone "footballs" are recharging, hand held satellite phones at the CR, TSC, and EOF will be used to maintain those links. The EOF satellite phone "Football" is able to be charged with the existing DG located at the EOF. The existing DG has a 1000-gallon tank that is able to provide 120 hours of power.

# **Portable Hand Held Satellite Phones**

As described in PG&E Letter DCL-12-110, Enclosure 1, Objective 3, PG&E committed to procure additional hand held satellite phones by December 31, 2013. These hand held satellite phones have a talk time of 3.1 hours and a recharge time of 4 hours. Each of these satellite phones will have 3 batteries including the ability to recharge the batteries in order to adequately provide 24 hours of operation. PG&E will procure additional hand held satellite phone batteries. PG&E will procure hand held satellite phone chargers that will be provided with portable generator back-up power. PG&E will evaluate the number of hand held satellite phones, batteries, and chargers and provide an update to the NRC in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.

### **Communications Trailer**

As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.1, each communications trailer is equipped with an onboard DG that has a fuel storage capacity that is adequate for 24 hours of operation. Diesel fuel oil (DFO) is available onsite in the main underground DFO storage tanks that are protected from seismic, flooding, and wind events in accordance with NEI 12-01.

### **FMT Hand Held Satellite Phones**

As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.4, the offsite field teams utilize hand held satellite phones to communicate. The onsite FMT satellite phones will be relocated to the onsite FMT vehicle. The onsite FMT vehicle is outfitted with a car charger in order to provide power to that satellite phone. The FMT satellite phones have a talk time of 3.1 hours and a recharge time of 4 hours. The offsite FMT satellite kits are able to be charged with the existing DG located at the EOF. The existing DG has a 1000-gallon tank that is able to provide 120 hours of power.

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	County Sheriff Watch Commander's Fixed Satellite Phone with
	As discussed in DCL-12-110, Enclosure 1, Objective 3, PG&E will provide the sheriff watch commander a fixed satellite phone with external antenna to maintain a constant communication link with Diablo Canyon Power Plant (DCPP). Back-up power for the sheriff watch commander's fixed satellite phone will be provided by an existing DG with a 1000-gallon tank that is capable of providing 120 hours of power. A status update of the above actions will be included in the 6-month status
	reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.
Plant radio svstem	<ul> <li>The plant radio system consists of the following components:</li> <li>Hand held single and dual band radios</li> </ul>
- ,	Operation Support Center (OSC) radio console
	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Appendix D, the plant radio system has back-up battery availability for 24 hours of operation.
	The battery life was determined by a calculation. The assumptions used are listed below:
	<ol> <li>It is assumed that only real time steady state and intermittent loads of equipment were evaluated. See Assumption 3.</li> </ol>
	<ul> <li>2) It is assumed that, in a worst case scenario, the batteries will operate at 75 percent efficiency. All "Hours of Backup" calculations were made with this 75 percent efficiency.</li> <li>2) It is assumed that interview the three days of the second state.</li> </ul>
	3) It is assumed that intermittent loads will be active 50 percent of the time. The "Effective Load" will be calculated by taking an average of the steady state load and intermittent load. All "Hours of Backup" calculations are made with this "Effective Load."
	<ol> <li>It is assumed that there is a margin of error of 0.10 ampere per load reading due to un-calibrated digital volt meter.</li> </ol>
	Hand Held Single and Dual Band Radios As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1,
	Sections 4.1.4 and 4.1.6, single and dual band radios were procured to support field monitoring teams. The single band radios have a talk time of 10 hours and a recharge time of 2 hours. The dual band radios have a talk time of 8 hours and recharge time of 2 hours. To ensure 24-hour
	discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 4.1.6, spare batteries and chargers will be procured in order to adequately support power availability to the radios for 24 hours. The procured hand held radio
	chargers will be provided with portable generator back-up power. PG&E will evaluate the number of radio batteries and chargers and provide an update to the NRC in the 6-month status reports prepared pursuant to NRC Order EA-12-049. Section IV C.2.
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PG&E Response to NRC Generic Technical Issue #1

	OSC Radio Console			
	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.4, PG&E plans to improve OSC communications by installing a radio console. As discussed in PG&E Letter DCL-12-110, Enclosure 1, Section 4.1.6, PG&E committed to procure portable generators and equipment to ensure that adequate power will exist to support extended operations. The OSC will be equipped with a portable DG, with a 24-hour fuel tank capacity, to provide power to lights and communications equipment. DFO is available onsite in the main underground DFO storage tanks that are protected from seismic, flooding, and wind events in accordance with NEI 12-01.			
	A status update of the above actions will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.			
Paging system	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 2, the SmartMsg and Zetron pager systems will be relocated from their current location, which is not considered to be seismically robust, to an existing structure that is seismically robust. The paging system will be battery backed, with a dedicated cable from a portable DG, to ensure that adequate power will exist to support extended operations beyond 24 hours.			
	A status update of the paging system will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049. Section IV.C.2.			
Plant telephone network private branch exchange	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Appendix D, the PBX has back-up battery availability for 24 hours of operation.			
(PBX)	<ul> <li>The battery life was determined by a calculation. The assumptions used are listed below:</li> <li>1) It is assumed that only real time steady state and intermittent loads of equipment were evaluated. See Assumption 3.</li> <li>2) It is assumed that, in a worst case scenario, the batteries will operate at 75 percent efficiency. All "Hours of Backup" calculations are made with this 75 percent efficiency.</li> <li>3) It is assumed that intermittent loads will be active 50 percent of the time. The "Effective Load" will be calculated by taking an average of the steady state load and intermittent load. All "Hours of Backup" calculations are made with this "Effective Load."</li> <li>4) It is assumed that there is a margin of error of 0.10 ampere per load reading due to un-calibrated digital volt meter.</li> </ul>			

# NRC Generic Technical Issue #2:

The use and function of the planned enhancements for the improvement of communications.

- A. A description of the use of the planned enhancements.
  - 1. A discussion of whether each planned enhancements identified is only to be used to maintain the communications link identified, or if it is expected to be shared among other communications links.
  - 2. A General description of the planned enhancement and how the equipment will be integrated.
  - 3. The title and description of the procedure that will be developed and used by plant personnel to describe protocols for shared usage of communication capabilities.

# PG&E Response to NRC Generic Technical Issue #2:

- 1. The enhancements are intended to only maintain the communication link as discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 5.
- 2. A general description of the planned enhancements is provided in the following table below.

Enhancement	Additional Information			
Satellite phone	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1,			
"Footballs"	Sections 4.1.1 and 4.1.5, the satellite phone "footballs" were procured to maintain communications links with offsite response organizations and Federal agencies. The satellite phone "footballs" are interim links until the communications trailers are deployed.			
Communications	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1,			
trailers	Section 4.1.1, the communications trailers have been outfitted with radio,			
	phone, and satellite capabilities to maintain communications between			
	offsite response organizations, the NRC, emergency response facilities,			
	and in-plant and offsite field response teams.			
Single/dual band	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1,			
radios	Section 4.1.4, operators and industrial fire officers will use the dual band			
	radios while in-plant emergency response teams and offsite responders			
	will use the single band radios. All in-plant radio communications will be			
	able to respond with point-to-point communications. Onsite radio			
	coverage will improve with the deployment of the communications trailer			
	repeater.			

# PG&E Response to NRC Generic Technical Issue #2

PG&E Response to NRC Generic Technical Issue #2

Enhancement	Additional Information
OSC radio console	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.4, the new OSC radio console will enable efficient radio communications with onsite teams. The status of the OSC radio console will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.
FMT satellite phone	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.4, the FMT satellite phone is used to support onsite and offsite FMT communications.
Spare radio batteries and chargers	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.6, the additional batteries will support 24-hour operation of the radios.
Portable generators	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.6, the portable generators will ensure that adequate power will exist to support extended operations. The status on the portable generators will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.
Paging system relocation	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 2, the relocated paging system will be used to notify in-plant personnel of a large scale natural disaster in lieu of the public address system. The status of the paging system relocation will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.
Fixed satellite phone for sheriff watch commander	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 7, the fixed satellite phone will provide a dedicated link for DCPP to provide notifications and communications to the sheriff watch commander's office.
Additional hand held satellite phones	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 3, the additional hand held satellite phones provide additional links in order to maintain communications with the emergency response facilities and county and state agencies. In addition, the additional hand held satellite phones are interim communications links until the communications trailers are deployed. These portable hand held satellite phones must be used externally to provide line of sight with the satellite.
Obtain additional national communications system (NCS) services	As discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 7, additional personnel will be added to the NCS in order to enhance overall communications capabilities.

3. Equipment identified in the planned enhancements is dedicated to specific communications links and will not have shared usage as discussed in PG&E Letter DCL-12-110, Enclosure 1.

### NRC Generic Technical Issue #3:

The protection of the new equipment purchased as a planned enhancement as well as the protection of the existing equipment analyzed as being available.

- A. A discussion of how the existing equipment analyzed to be available and enhancements to these communication links as well as associated ancillary equipment will be stored in a manner that is protective from a large scale natural event.
  - 1. A description of pre-identified areas that are considered protective for existing equipment and whether new equipment will be stored in a similar location. The title and brief description of a procedure for new communications equipment storage is acceptable, if this procedure is planned to be developed in the future; or a statement that this will be completed in alignment with NRC Order EA-12-049.
  - 2. Equipment stored offsite, should have an analysis of duration to set-up this equipment for use.
  - 3. The analysis demonstrates that the existing equipment that is expected to be available will be functional.

#### PG&E Response to NRC Generic Technical Issue #3:

 Existing Communications Systems: The existing communications equipment determined to be available onsite is located in the auxiliary and turbine building. These communications systems and ancillary equipment were evaluated and determined to be reasonably protected from seismic, wind, and flooding events.

#### Planned Enhancements:

All onsite planned enhancements will be located in buildings that will be evaluated to be reasonably protected from seismic, wind, and flooding events. The portable generators and two onsite communications trailers will be stored in locations that are reasonably protected from seismic, wind, and flooding events. All planned enhancements at the EOF will be reasonably protected from seismic, wind, and flooding events in accordance with NEI 12-01 Section 2.4. A procedure will be developed for the new communications equipment in accordance with NEI 12-06 Section 11.4.

2. No equipment is stored offsite that would have to be relocated onsite to provide onsite communications. The County sheriff watch commander's fixed satellite phone with external antenna will be stored at the County emergency operations center. The offsite communications trailer, EOF satellite phone "football", and portable hand held satellite phones are the only communications equipment that will be stored offsite at the EOF. The offsite communications trailer, satellite

phone "football", and hand held satellite phones are intended to be used at the EOF and therefore the required communications capability will be established as a part of the EOF activation process.

- 3. As discussed in PG&E Letter DCL-12-110, Enclosure 1, PG&E defined reasonable protection for seismic, flooding, and wind using existing guidance provided in EPRI NP-6041 for determination of seismic/wind design capabilities of structures, systems, and components in the vicinity of existing emergency preparedness (EP) communications equipment. Where these procedures and guidance cannot be applied, EP communications equipment should be contained within one or more of the configurations:
  - (a) In an existing safety-related structure designed for the safe shutdown earthquake, or
  - (b) In a structure designed to or evaluated equivalent to ASCE 7-10, Minimum Design Loads for Buildings and Other Structures, or
  - (c) Outside a structure and evaluated for seismic interactions to ensure equipment is not damaged by non-seismically robust components or structures.

A team consisting of civil and telecommunications engineers performed a walkdown of the communications systems using the above criteria to establish that these systems were reasonably protected from seismic, wind, and flooding.

The functionality of the existing communications equipment is demonstrated by periodic testing in accordance with procedures STP I-29, "Emergency Signals and Communications Systems Functional Test," EP MT-27, "Technical Support Center (TSC) and Alternate Facility Location," EP MT-28, "Operational Support Center (OSC) and Alternate Facility Location," EP MT-29, "Emergency Operations Facility." STP I-29 will be revised to include functional testing of the fixed and hand held satellite phones in the CR. The plant telephones and the hand held radios are common business use equipment that is used on a routine basis.

### NRC Generic Technical Issue #4:

The programmatic controls for the use of the new equipment purchased as a planned enhancement.

- A. A description of planned proceduralization and training for the use of these planned enhancements. It is acceptable to provide the title and description of a new procedure for new communications equipment.
  - 1. A description of any credited manual actions and their procedures.
  - 2. A description of any maintenance for this equipment, including operability testing.
  - 3. A description of any periodic inventory checks.
  - 4. A description of planned staff training.

#### PG&E Response to NRC Generic Technical Issue #4:

- 1. Credited manual actions and their procedures will be established in accordance with NEI 12-01 and NRC Order EA-12-049. A status update of the credited manual actions and their procedures will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.
- Maintenance procedures for the planned enhancements, including operability testing, will be established in accordance with NEI 12-01 and NRC Order EA-12-049. A status update of the maintenance procedures will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.
- 3. Periodic inventory checks for the planned enhancements will be established in accordance with NEI 12-01 and NRC Order EA-12-049. A status update of the periodic inventory checks will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2.
- 4. Training plans will be developed for response personnel in plant groups such as the emergency response organization (ERO), fire, security, emergency planning, operations, engineering, and maintenance. The training plan will be developed in accordance with DCPP procedures using the systematic approach to training and will be implemented to ensure that the required DCPP staff is trained in accordance with NEI 12-01 and NRC Order EA-12-049. A status update of the training will be included in the 6-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2

### NRC Generic Technical Issue #5:

A discussion on what assumptions are used as part of the Communications Assessment.

A. A description of the assumptions used for the submitted Communications Assessment Summary, and technical justification for any differences from the assumptions within NEI 12-01 Sections 2.2 "Assumptions Common to Both Assessments" and 2.4 "Assumptions for Communications Assessment".

### PG&E Response to NRC Generic Technical Issue #5:

A. The assumptions used for the communications assessment are in accordance with NEI 12-01, Revision 0, Sections 2.2 and 2.4.

In PG&E Letter DCL-12-110, Enclosure 1, Assessment Assumptions combines the NEI 12-01, Sections 2.2 and 2.4 assumptions. This resulted in an incorrect reference. Assessment Assumption #11 should refer back to Assumption #10 rather than Assumption #7. In addition, Assumption #10 references wording from NEI 12-01 Revision A. Assumption #10 should be referenced to NEI 12-01, Revision 0, Section 2.4, Assumption #7.

### NRC Generic Technical Issue #6:

How plant personnel will be notified in the event of a large scale natural event that causes a loss of all AC power.

- A. A description and title of the procedure for emergency notification of essentially all plant staff within 30 minutes [If applicable to the licensee Emergency Plan].
- B. A description and title of the procedure for notification of emergency response organization staff (i.e., self-activation) [If applicable].

### PG&E Response to NRC Generic Technical Issue #6:

- A. Emergency plan implementing procedures EP G-2, "Interim Emergency Response Organization," EP G-4, "Assembly and Accountability," and EP G-5, "Evacuation of Non-Essential Site Personnel" describe the public address system and the paging system as the primary methods of notifying in-plant personnel of a large scale natural disaster.
- B. As discussed in PG&E Letter DCL-12-061, PG&E committed to revise procedures to include degraded communications capabilities. In the event of a large scale natural disaster, procedure OM10.DC2, "Emergency Response Organization On-call" directs the ERO staff to report to their assigned emergency response facilities. This procedure describes the expected actions of the ERO.

# NRC Generic Technical Issue #7:

How communications will be maintained during the period of final implementation of the communications enhancements.

A. Identification and description of the interim actions that will be in place to bridge the gap until all final mitigation strategies being proceduralized are implemented. This also includes equipment protection.

# PG&E Response to NRC Generic Technical Issue #7:

A. As discussed in PG&E Letter DCL-12-061, Enclosure 1, Communications Request #2, the communications trailers, satellite phone "footballs", single band radios, and dual band radios have arrived onsite and will be fully implemented by December 31, 2013, in order to provide interim methods of communications until full implementation of the communications commitments. These interim enhancements will be placed in their respective buildings or protected from seismic, flooding, and wind interactions in accordance with NEI 12-01.

# NRC Generic Technical Issue #8:

Descriptions are needed regarding how communications will be maintained with the onsite and in-plant response teams and offsite response organization communication links.

- A. A timeline for when the evaluation for site specific improvements for on-site and in-plant response teams will be completed.
- B. A discussion of the enhancements that are planned for the offsite response organization communications links.

# PG&E Response to NRC Generic Technical Issue #8:

- A. The evaluation for site-specific improvements for the onsite and in-plant response teams has been completed and submitted to the NRC in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Sections 4.1.4 and 4.1.6. PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Sections 4.1.4 and 4.1.6 describes additional actions such as the communications trailer, hand held radios, and OSC radio console. Complete implementation of Phase 1 commitments (i.e., communications trailers and hand held radios) is December 31, 2013. Complete implementation of Phase 2 commitments (i.e., OSC radio console) is October 27, 2015.
- B. The enhancements planned for the offsite response organization (ORO) communication links are discussed in PG&E Letter DCL-12-110, Enclosure 1, Objective 1, Section 4.1.1 and Objective 3. The satellite phone "footballs" or

hand held satellite phones will maintain notifications and communications from the CR, TSC, and EOF, to OROs. Once the EOF is activated, EOF response personnel are able to communicate face-to-face with County responders due to the joint location of the response facilities. Additionally, PG&E committed to provide a fixed satellite phone with an external mounted antenna to the County sheriff watch commander to maintain a dedicated communication line with the County. The State of California Warning Center is outside of the 25-mile radius and is assumed to be available post event. The satellite phone "footballs" or portable hand held satellite phones will provide the required communications links between DCPP and the State of California.

# **Regulatory Commitments**

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

Commitment	Due Date
PG&E will provide power from an uninterrupted power supply	October 27, 2015
with 6 hours of back-up power to the CR and TSC fixed	
satellite phones.	
PG&E will procure additional hand held satellite phone	December 31, 2013
batteries.	
PG&E will procure hand held satellite phone chargers that will	December 31, 2013
be provided with portable generator back-up power.	
A procedure will be developed for the new communications	October 27, 2015
equipment in accordance with NEI 12-06 Section 11.4.	
STP I-29 will be revised to include functional testing of the	December 31, 2013
fixed and hand held satellite phones in the CR.	
A status update of the planned communications equipment	6 month intervals
will be included in the 6-month status reports prepared	following submittal of
pursuant to NRC Order EA-12-049, Section IV.C.2.	the Overall
	Integrated Plan