Pacific Gas and Electric Company®

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February 26, 2014

PG&E Letter DCL-14-014

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 Second Six-Month 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, "Issuance of Order to Modify Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012

2. PG&E Letter DCL-13-007, "Pacific Gas and Electric Company's Overall Integrated Plan 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)," dated February 27, 2013

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission issued Reference 1 to Pacific Gas and Electric Company (PG&E) directing 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 Reference 1, Attachment 2.

Pursuant to Reference 1, Section IV, Condition C, PG&E submitted its overall integrated plan for mitigation strategies for beyond-design-basis external events in Reference 2.

Pursuant to Reference 1, Section IV, Condition C.2, and in accordance with the direction provided in NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX)

Implementation Guide," Enclosure 1 to this letter provides PG&E's second six-month status report of its overall integrated plan.

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. Patrick Nugent at (805) 781-9786.

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

Executed on February 26, 2014.

Sincerely,

Barry S. Allen
*Site Vice President*

dmfn/SAPN 50466122-13
Enclosures
cc: Diablo Distribution
cc:/enc: Marc L. Dapas, NRC Region IV Administrator
Thomas R. Hipschman, NRC, Senior Resident Inspector
James S. Kim, NRR Project Manager
Eric J. Leeds, NRC/NRR Director

**Pacific Gas and Electric Company's Second Six-Month Status Report for the Implementation of NRC Order EA-12-049**

## 1. Introduction

Pacific Gas and Electric Company (PG&E) developed an overall integrated plan (OIP) (Reference 1 [refer to Section 11 of this enclosure for a list of references]), documenting diverse and flexible strategies (FLEX), in response to Nuclear Regulatory Commission (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 (Reference 2). This enclosure provides the second update of milestone accomplishments since the submittal of Reference 1, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

## 2. Milestone Accomplishments

The following milestone(s) have been completed since the submittal of PG&E Letter DCL-13-081, "Pacific Gas and Electric Company's First Six-Month 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)" (Reference 3), and are current as of January 31, 2014:

(1) The Phase 1 communications equipment implementation was completed on December 31, 2013.

## 3. Milestone Schedule Status

The following table provides an update to the milestone schedule status provided in Reference 3. It provides the activity status of each item, and a revised target completion date where applicable. The target dates are subject to change as design and implementation details are developed.

There were no revised milestone target completion dates since the issuance of Reference 3.

Equipment stored in Area 10 (Reference 1) will now be stored in Warehouse B. The milestones for Area 10 have been relabeled to reflect Warehouse B. The change in storage locations does not impact the Order implementation dates.

| Activity | Target Completion Date | Activity Status | Revised Target Completion Date |
|---|---|---|---|
| Submit 20-day report | Apr 2012 | Complete | |
| Submit 60-day status report | Oct 2012 | Complete | |

| Activity | Target Completion Date | Activity Status | Revised Target Completion Date |
|---|---|---|---|
| Submit Overall Integrated Plan | Feb 2013 | Complete | |
| **Submit six-month status updates** | | | |
| Update 1 | Aug 2013 | Complete | |
| Update 2 | Feb 2014 | Complete | |
| Update 3 | Aug 2014 | Not started | |
| Update 4 | Feb 2015 | Not started | |
| Update 5 | Aug 2015 | Not started | |
| Update 6 | Feb 2016 | Not started | |
| Update 7 | Aug 2016 | Not started | |
| **Modifications timeline** | | | |
| Phase 1 Modifications | | | |
| a. Design | N/A | N/A | |
| b. Equipment Procurement | N/A | N/A | |
| c. Installation | N/A | N/A | |
| Phase 2 Modifications | | | |
| a. Design | 12/31/14 | Started | |
| b. Equipment Procurement | 12/31/14 | Started | |
| c. Unit 1 Installation | 10/30/15 | Not started | |
| d. Unit 2 Installation | 5/31/16 | Not started | |
| Phase 3 Modifications | | | |
| a. Design | 12/31/14 | Started | |
| b. Equipment Procurement | 12/31/14 | Started | |
| c. Unit 1 Installation | 10/30/15 | Not started | |
| d. Unit 2 Installation | 5/31/16 | Not started | |
| **Procedure guidance implementation** | | | |
| a. Unit 1 Strategies | 10/30/15 | Not started | |
| b. Unit 2 Strategies | 5/31/16 | Not started | |
| c. Unit 1 Maintenance | 10/30/15 | Not started | |
| d. Unit 2 Maintenance | 5/31/16 | Not started | |
| e. Unit 1 Testing | 10/30/15 | Not started | |
| f. Unit 2 Testing | 5/31/16 | Not started | |
| **FLEX storage facilities** | | | |
| a. Warehouse B | 12/31/14 | Started | |
| b. Lot 11 | 12/31/14 | Started | |
| **Staffing analysis** | | | |
| a. Phase 1 | | | |
| 1. Study Complete | 3/29/13 | Complete | |
| 2. NRC Submittal | 4/30/13 | Complete | |
| b. Phase 2 | | | |
| 1. Study Complete | 5/27/15 | Not started | |
| 2. NRC Submittal | 5/27/15 | Not started | |
| **Training completion for the strategies** | | | |
| a. Unit 1 | 10/30/15 | Not started | |

| Activity | Target Completion Date | Activity Status | Revised Target Completion Date |
|---|---|---|---|
| b. Unit 2 | 5/31/16 | Not started | |
| **Regional response center 2 (Phoenix) operational** | 8/28/14 | Started | |
| **Communications equipment implementation (PG&E Letter DCL-12-110)** | | | |
| a. Phase 1 | 12/31/13 | Complete | |
| b. Phase 2 | 10/27/15 | Started | |
| **Unit 1 Walk-throughs or Demonstrations** | 10/30/15 | Not started | |
| **Unit 2 Walk-throughs or Demonstrations** | 5/31/16 | Not started | |
| **Unit 1 FLEX implementation complete** | 10/30/15 | Not started | |
| **Unit 2 FLEX implementation complete** | 5/31/16 | Not started | |

## 4. Changes to Compliance Method

The following identifies changes to References 1 and 3, as applicable, and the reason for each change. All changes meet applicable NEI 12-06 compliance methods.

Change 1 – "General Integrated Plan Elements"

(1) "Extreme Cold, Snow and Ice": Added a statement that Diablo Canyon Power Plant (DCPP) FLEX equipment will be designed and procured to function continuously at 24°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(2) "Extreme Heat": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 104°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(3) "Discussion of time constraints identified in Attachment 1A":

(a) Item (20): As discussed in the OIP, the initial vital battery in each Unit will continue to provide adequate power for required loads for at least 15 hours. The second battery will then be placed in service and the initial battery secured. The second battery will continue to provide adequate power for a minimum of an additional 9 hours.

However, because of the overlap between placing one battery in service and removing the other from service, DCPP would have at least 16 hours of power from the first battery and at least 8 hours of additional power on a second battery (Reference PG&E's Response to 049-RAI-DCPP-094). The discussion is being updated to state that the initial battery in each unit will continue to

provide adequate power for required loads for at least 16 hours and the second battery will continue to provide adequate power for a minimum of an additional 8 hours.

(b) Item (26): The time constraint for placing the emergency auxiliary feedwater (EAFW) pump and raw water reservoir (RWR) equipment in service was changed from 30 hours to 31 hours (Reference PG&E's Response to 049-RAI-DCPP-090).

(c) Items (29) though (32): The time constraint for the Regional Response Center (RRC) was changed from greater than 72 hours to within 72 hours (Reference PG&E's Response to 049-RAI-DCPP-008).

Change 2 – "Maintain Core Cooling and Heat Removal Strategy"

(1) "Phase 1, Core Cooling with SGs Available": Clarified that DCPP does not intend to cooldown using less than all four steam generators following an extended loss of alternating current power (ELAP) (Reference PG&E's Response to 049-RAI-DCPP-031).

(2) "Phase 1, Core Cooling with SGs Available": Changed the amount of time that sufficient seismically-protected inventory will provide auxiliary feedwater after the initiating event from 30 hours to 31 hours (Reference PG&E's Response to 049-RAI-DCPP-090).

(3) "Phase 2, Core Cooling with SGs Available": Added the use of a strainer at the RWR suction line. The RWR pump will be staged at the RWR drawing water from the RWR through a suction hose equipped with a strainer. The RWR pump, backup RWR pump, associated strainers, and flexible hoses will be stored at a FLEX storage facility (Reference PG&E's Response to 049-RAI-DCPP-043).

(4) "Phase 2, Storage/Protection of Equipment – Seismic": Replaced wording that the FLEX equipment will be protected in accordance with NEI 12-06, Section 5.3.1 with the following: "Large portable FLEX equipment will be evaluated for seismic concerns and secured as appropriate in accordance with NEI 12-06, Section 5.3.1.2. Additionally, the equipment will be evaluated and protected from potential seismic interaction in accordance with NEI 12-06, Section 5.3.1.3" (Reference PG&E's Response to 049-RAI-DCPP-005).

(5) "Phase 2, Storage/Protection of Equipment – Snow, Ice, and Extreme Cold": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 24°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(6) "Phase 2, Storage/Protection of Equipment – High Temperatures": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 104°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(7) "Phase 2, Strategy – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(8) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(9) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Added a statement that Warehouse B will be upgraded to meet ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b (Reference PG&E's Response to 049-RAI-DCPP-004).

(10) "Phase 2, Protection of Connections – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(11) "Phase 2, Modifications – Equipment Storage – Lot 11 BDB Storage Facility": Replaced "The equipment at this facility will be protected in accordance with NEI 12-06, Section 5.3.1" with "The pad and metal building (if installed in the future) will be designed to ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b. FLEX equipment stored at the Lot 11 BDB Storage Facility will be evaluated for seismic interactions to ensure the equipment is not damaged by non-seismically robust components or structures per NEI 12-06, Section 5.3.1.1.c" (Reference PG&E's Response to 049-RAI-DCPP-004).

(12) "Phase 3": Added a statement that portable dewatering pumps will be maintained as FLEX equipment along with adequate amounts of flexible hose to dewater the vaults and access the auxiliary saltwater tie-in point, as required. A portable dewatering pump and flexible hoses will be stored at each FLEX storage facility (Reference PG&E's Response to 049-RAI-DCPP-012).

(13) "Phase 3, Strategy – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(14) "Phase 3, Strategy – Equipment Storage – Area 10 BDB Storage Facility": Added that a dewatering pump and associated flexible hoses will be stored at this facility and will be transported to their staging locations and deployed (Reference PG&E's Response to 049-RAI-DCPP-012).

(15) "Phase 3, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(16) "Phase 3, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Added a statement that Warehouse B will be upgraded to meet ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b (Reference PG&E's Response to 049-RAI-DCPP-004).

(17) "Phase 3, Protection of Connections – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(18) "Phase 3, Strategy – Equipment Storage – Area 11 BDB Storage Facility": Added that a dewatering pump and associated flexible hoses will be stored at this facility and will be transported to their staging locations and deployed (Reference PG&E's Response to 049-RAI-DCPP-012).

(19) "Phase 3, Modifications – Equipment Storage – Lot 11 BDB Storage Facility": Replaced "The equipment at this facility will be protected in accordance with NEI 12-06, Section 5.3.1" with "The pad and metal building (if installed in the future) will be designed to ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b. FLEX equipment stored at the Lot 11 BDB Storage Facility will be evaluated for seismic interactions to ensure the equipment is not damaged by non-seismically robust components or structures per NEI 12-06, Section 5.3.1.1.c" (Reference PG&E's Response to 049-RAI-DCPP-004).

Change 3 – "Maintain RCS Inventory Control Strategy"

(1) "Phase 1": Clarified that following the declaration of an ELAP, a plant cooldown to a steam generator pressure of 240 psig will be initiated within 8 hours after the ELAP and completed within 12 hours (Reference PG&E's Response to 049-RAI-DCPP-028).

(2) "Phase 2, Storage/Protection of Equipment – Seismic": Replaced "The FLEX equipment will be protected in accordance with NEI 12-06, Section 5.3.1" with "Large portable FLEX equipment will be evaluated for seismic concerns and secured as appropriate in accordance with NEI 12-06, Section 5.3.1.2. Additionally, the equipment will be evaluated and protected from potential seismic interaction in accordance with NEI 12-06, Section 5.3.1.3" (Reference PG&E's Response to 049-RAI-DCPP-005).

(3) "Phase 2, Storage/Protection of Equipment – Snow, Ice, and Extreme Cold": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 24°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(4) "Phase 2, Storage/Protection of Equipment – High Temperatures": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 104°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(5) "Phase 2, Strategy – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(6) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(7) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Added a statement that Warehouse B will be upgraded to meet ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b (Reference PG&E's Response to 049-RAI-DCPP-004).

(8) "Phase 2, Protection of Connections – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(9) "Phase 2, Modifications – Equipment Storage – Lot 11 BDB Storage Facility": Replaced "The equipment at this facility will be protected in accordance with NEI 12-06, Section 5.3.1" with "The pad and metal building (if installed in the future) will be designed to ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b. FLEX equipment stored at the Lot 11 BDB Storage Facility will be evaluated for seismic interactions to ensure the equipment is not damaged by non-seismically robust components or structures per NEI 12-06, Section 5.3.1.1.c" (Reference PG&E's Response to 049-RAI-DCPP-004).

Change 4 – "Maintain Spent Fuel Pool Cooling"

(1) "Phase 2, Storage/Protection of Equipment – Seismic": Replaced "The FLEX equipment will be protected in accordance with NEI 12-06, Section 5.3.1" with "Large portable FLEX equipment will be evaluated for seismic concerns and secured as appropriate in accordance with NEI 12-06, Section 5.3.1.2. Additionally, the equipment will be evaluated and protected from potential seismic interaction in accordance with NEI 12-06, Section 5.3.1.3" (Reference PG&E's Response to 049-RAI-DCPP-005).

(2) "Phase 2, Storage/Protection of Equipment – Snow, Ice, and Extreme Cold": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 24°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(3) "Phase 2, Storage/Protection of Equipment – High Temperatures": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 104°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(4) "Phase 2, Strategy – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(5) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(6) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Added a statement that Warehouse B will be upgraded to meet ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b (Reference PG&E's Response to 049-RAI-DCPP-004).

(7) "Phase 2, Protection of Connections – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(8) Phase 2, Modifications – Equipment Storage – Lot 11 BDB Storage Facility": Replaced "The equipment at this facility will be protected in accordance with NEI 12-06, Section 5.3.1" with "The pad and metal building (if installed in the future) will be designed to ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b. FLEX equipment stored at the Lot 11 BDB Storage Facility will be evaluated for seismic interactions to ensure the equipment is not damaged by non-seismically robust components or

structures per NEI 12-06, Section 5.3.1.1.c" (Reference PG&E's Response to 049-RAI-DCPP-004).

Change 5 – "Safety Functions Support"

(1) "Phase 1, Electrical": According to the OIP, "At approximately 15 hours the first battery approaches depletion and a second battery is placed in service for an additional 9 hours." However, because of the overlap between placing one battery in service and removing the other from service, DCPP would have at least 16 hours of power from the first battery and at least 8 hours of additional power on a second battery (Reference PG&E's Response to 049-RAI-DCPP-094). Therefore, the OIP is updated to read, "At approximately 16 hours the first battery approaches depletion and a second battery is placed in service for an additional 8 hours."

(2) "Phase 2, Storage/Protection of Equipment – Seismic": Replaced "The FLEX equipment will be protected in accordance with NEI 12-06, Section 5.3.1" with "Large portable FLEX equipment will be evaluated for seismic concerns and secured as appropriate in accordance with NEI 12-06, Section 5.3.1.2. Additionally, the equipment will be evaluated and protected from potential seismic interaction in accordance with NEI 12-06, Section 5.3.1.3" (PG&E's Response to 049-RAI-DCPP-005).

(3) "Phase 2, Storage/Protection of Equipment – Snow, Ice, and Extreme Cold": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 24°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(4) "Phase 2, Storage/Protection of Equipment – High Temperatures": Added a statement that DCPP FLEX equipment will be designed and procured to function continuously at 104°F (Reference PG&E's Response to 049-RAI-DCPP-002).

(5) "Phase 2, Strategy – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(6) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(7) "Phase 2, Modifications – Equipment Storage – Area 10 BDB Storage Facility": Added a statement that Warehouse B will be upgraded to meet ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b (Reference PG&E's Response to 049-RAI-DCPP-004).

(8) "Phase 2, Protection of Connections – Equipment Storage – Area 10 BDB Storage Facility": Replaced equipment storage location Area 10 with Warehouse B (Reference PG&E's Response to 049-RAI-DCPP-004).

(9) Phase 2, Modifications – Equipment Storage – Lot 11 BDB Storage Facility": Replaced "The equipment at this facility will be protected in accordance with NEI 12-06, Section 5.3.1" with "The pad and metal building (if installed in the future) will be designed to ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b. FLEX equipment stored at the Lot 11 BDB Storage Facility will be evaluated for seismic interactions to ensure the equipment is not damaged by non-seismically robust components or structures per NEI 12-06, Section 5.3.1.1.c" (Reference PG&E's Response to 049-RAI-DCPP-004).

Change 6 – OIP Table 1, "PWR Portable Equipment Phase 2"

(1) Added two 150-gpm portable dewatering pumps (Reference PG&E's Response to 049-RAI-DCPP-012).

(2) Changed the number of portable diesel-driven generators with lighting masts from seven to eight in Table 1. This change was identified during the development of PG&E's response to 049-RAI-DCPP-026.

(3) Updated the performance criteria for the following diesel-generator loads (Reference PG&E's Response to 049-RAI-DCPP-026):

| | |
|---|---|
| Six 120/240-V portable diesel-driven generators | 5.6kW |
| Two 480-V diesel-driven generators for battery chargers and telecommunications equipment | 191kW |
| Two 480-V diesel-driven generators for ERCS pumps | 87.4kW |

(4) Updated the performance criteria for the following pumps, as were identified during the development of PG&E's Responses to 049-RAI-DCPP-036 and 049-RAI-DCPP-090:

| | |
|---|---|
| Three EAFW diesel-driven pumps | 175 gpm at 300 psig |
| Two RWR diesel-driven pumps | 1200 gpm at 150 psid |

Change 7 – OIP Table 2, "PWR Portable Equipment Phase 3"

(1) Updated the performance criteria for two 4-kV generator sets (one per unit) from 2MW to 1.012MW (Reference PG&E's Response to 049-RAI-DCPP-026).

Change 8 – Attachment 1A, "Sequence of Events Timeline"

(1) Action Item 20 – The elapsed time and time constraint for aligning the second vital battery and securing the initial vital battery is currently 15 hours. However, because of the overlap between placing one battery in service and removing the other from service, DCPP would have at least 16 hours of power from the first battery and at least 8 hours of additional power on a second battery (Reference PG&E's Response to 049-RAI-DCPP-094). The elapsed time and time constraint are being updated from 15 hours to 16 hours.

(2) Action Item 20 – As stated in the Remarks/Applicability section, "At approximately 15 hours the first battery approaches depletion and a second battery is placed in service for an additional 9 hours." However, because of the overlap between placing one battery in service and removing the other from service, DCPP would have at least 16 hours of power from the first battery and at least 8 hours of additional power on a second battery (Reference PG&E's Response to 049-RAI-DCPP-094). Therefore, the OIP is updated to read, "At approximately 16 hours the first battery approaches depletion and a second battery is placed in service for an additional 8 hours."

(3) Action Item 24 – Remarks/Applicability wording is being changed from, "At approximately 15 hours the first battery approaches depletion and a second battery is placed in service for an additional 9 hours" to "At approximately 16 hours the first battery approaches depletion and a second battery is placed in service for an additional 8 hours." Refer to Change 1 – "General Integrated Plan Elements" Number (3).

(4) Action Item 26 – Changed the time constraint to place the EAFW and RWR equipment in service from 30 hours to 31 hours (Reference PG&E's Response to 049-RAI-DCPP-090).

(5) Action Item 29 – Changed the elapsed time to establish alternate fuel from supply from greater than 72 hours to less than 72 hours (Reference PG&E's Response to 049-RAI-DCPP-008).

(6) Action Item 29 – Added in the Remarks section that "DCPP has sufficient diesel fuel oil supply in the underground, seismically qualified (Hosgri) DFO storage tanks to run the Phase 2 FLEX equipment for greater than 7 days" (Reference PG&E's Response to 049-RAI-DCPP-057).

(7) Action Item 30 – Changed the elapsed time to align large generators from greater than 72 hours to less than 72 hours (Reference PG&E's Response to 049-RAI-DCPP-008).

(8) Clarified Note (b) to read: To be delivered from the RRC and available to be placed in service within 72 hours after notifying the RRC (Reference PG&E's Response to 049-RAI-DCPP-008).

Change 9 – OIP Attachment 2, "DCPP Units 1 and 2 Implementation Milestone Schedule"

Refer to Section 3 of this Enclosure.

Change 10 – OIP Attachment 3, "Conceptual Sketches"

(1) Retitled Figure 1 in contents to read "Deployment Routes – Warehouse B BDB Storage Facility"

(2) Figure 1 Revisions:

(a) Removed Area 10 BDB Storage Facility and associated deployment routes

(b) Added Warehouse B BDB Storage Facility and associated deployment routes

(c) Added fourth staging area (for staging of the dewatering pumps)

Reference PG&E's response to 049-RAI-DCPP-004 for 1, 2a and 2b.
Reference PG&E's response to 049-RAI-DCPP-012 for 2c.
See Attachment A for the revised figure.

## 5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

PG&E expects to comply with the order implementation date and no relief/relaxation is required at this time.

## 6. Open Items from Overall Integrated Plan

The following provides a summary and status of the open items documented in Reference 1. Open items identified as completed in Reference 3 require no further update.

OI-1

Required staffing levels will be verified by walkthroughs, tabletops, and simulations of the identified FLEX strategies as a part of the Phase 2 staffing studies conducted in accordance with NEI 12-01.

> Status: Not started. The Phase 2 staffing assessment will be completed and submitted to the NRC four months prior to the Unit 1 19th refueling outage, which is currently scheduled to begin in the Fall of 2015 (Reference 6).

OI-5

PG&E will perform a containment evaluation based on the boundary conditions described in NEI 12-06, Section 2. Based on the results of this analysis, required actions to ensure maintenance of containment integrity and required instrument function will be developed.

> Status: This item is complete. The nuclear industry resolved this item generically in NEI position paper, "Position Paper: Shutdown/Refueling Modes," dated September 18, 2013, which was endorsed by the NRC on September 30, 2013, (ADAMS Accession No. ML13267A382). PG&E will utilize the guidance in the position paper to develop actions to ensure maintenance of containment integrity and required instrument function.

OI-6

PG&E will develop procedures to read this instrumentation locally, where applicable, using a portable instrument as required by NEI 12-06, Section 5.3.3.

> Status: Procedures are currently scheduled to be issued by October 31, 2015, for Unit 1 and May 31, 2016, for Unit 2.

## 7. NRC FLEX Audit RAI Updates

PG&E provided its response to NRC FLEX Audit requests for additional information (RAIs) in November 2013. In its response, PG&E committed to provide an update of specific items in the six-month status reports prepared in pursuant to NRC Order EA-12-049.

The following provides a revision to PG&E's response to 049-RAI-DCPP-061:

049-RAI-DCPP-061:

Pumps for Phases 2 and 3 will be self-cooling or air-cooled and will require support cooling.

Update:

In PG&E's response to 049-RAI-DCPP-061, PG&E stated that pumps for Phases 2 and 3 will be self-cooling or air-cooled, yet would still require support cooling. This statement is updated to reflect that as the pumps will be self-cooling or air-cooled, support cooling will not be required. The revised RAI response should read as follows:

"Pumps for Phases 2 and 3 will be self-cooling or air-cooled and will not require support cooling."

The following provides a summary of the NRC FLEX RAI status updates:

049-RAI-DCPP-003:

PG&E will provide the storage locations of the debris removal equipment.

Status: PG&E is evaluating the debris removal equipment needed and the appropriate storage locations for the equipment and will provide the storage locations of debris removal equipment in a future six-month status update.

049-RAI-DCPP-010:

PG&E will provide parking locations of the trucks required to support the movement of the FLEX equipment within the required timeframes.

Status: PG&E is evaluating the parking location options for the trucks required to support the movement of FLEX equipment within the required timeframes and will provide the parking locations in a future six-month status update.

049-RAI-DCPP-040:

PG&E will confirm that the performance of SHIELD reactor coolant pump (RCP) low-leakage seals, following the re-design, will not preclude personnel entry into the containment to allow manual actions to be taken or result in additional heat added to containment in Modes 1 through 4 than was assumed in the extended loss of alternating current power event containment integrity analysis.

Status: The SHIELD RCP low-leakage re-design is in progress. PG&E will provide the requested information upon completion of detailed design in a future six-month status update.

049-RAI-DCPP-043:

The suction hose connected to the RWR pump and dropped into the RWRs will have a strainer. PG&E will provide additional information on the strainer design.

Status: Upon completion of detailed design, PG&E will provide additional information on the strainer design for the suction hose connected to the RWR pump in a future six-month status update.

049-RAI-DCPP-092:

For the shutdown modes, PG&E will be following industry guidance as it is developed. PG&E will be developing its strategies in accordance with the shutdown modes whitepaper.

Status: This item is complete. See the response to OI-5 in Section 6.

## 8. Interim Staff Evaluation Open and Confirmatory Item Updates

The following provides PG&E's response to the NRC Interim Staff Evaluation open item and confirmatory items:

Interim Staff Evaluation Open Item 3.2.1.8.A

*The Pressurized-Water Reactor Owners Group (PWROG) submitted to NRC a position paper, dated August 15, 2013 (ADAMS Accession No. ML 13235A135 (non-public for proprietary reasons)), which provides test data regarding boric acid mixing under single-phase natural circulation conditions and outlined applicability conditions intended to ensure that boric acid addition and mixing would occur under conditions similar to those for which boric acid mixing data is available. Since the audit discussions, the NRC endorsed the PWROG guidance with several clarifications in letter dated January 8, 2014. The licensee should address commitment to the generic approach and the clarifications in alignment with the NRC endorsement letter for the development of an adequate model for determining the mixing of boric acid in the reactor coolant system during natural circulation with the potential for two-phase flow conditions.*

Response: PG&E will comply with the requirement identified by the NRC staff in the letter dated January 8, 2014, regarding the boron mixing issue for pressurized water reactors (PWRs) (Adams Accession No. ML13276A183). The NRC letter states that the NRC staff has reviewed the information submitted to date and concluded that use of the industry approach dated August 15, 2013,

entitled "Westinghouse Response to NRC Generic Request for Additional Information (RAI) on Boron Mixing in Support of the Pressurized Water Reactor Owners Group (PWROG)," (ADAMS Accession No. ML13235A135) is acceptable with clarifications listed in the letter.

This open item is complete.

Confirmatory Item 3.1.1.1.A

*The licensee's response to the NRC audit process noted that both FLEX equipment storage locations may be subject to seismically-induced small landslide debris flows, which will be accommodated into the design of the facilities. Confirm incorporation of the capability to withstand seismically-induced small landslide debris flow.*

Response: PG&E will evaluate the capability of FLEX equipment storage locations to withstand seismically-induced small landslide debris flow and provide requested confirmation in a future six-month status update.

Confirmatory Item 3.1.1.4.A (049-RAI-DCPP-006):

*Off-Site Resources – Confirm RRC local staging area, evaluation of access routes, and method of transportation to the site.*

Response: PG&E will confirm RRC local staging area, evaluation of access routes, and method of transportation to the site in a future six-month update.

Confirmatory Item 3.2.1.A

*NEI 12-06, Section 3.2.1.5, on reactor coolant inventory loss, states sources of expected reactor coolant inventory loss includes "losses from letdown unless automatically isolated or until isolation is procedurally directed." Provide discussion and/or analysis regarding letdown losses.*

Response: PG&E will provide a discussion and/or analysis regarding letdown in a future six-month status update.

Confirmatory Item 3.2.1.B

*RCS cooling and heat removal, and RCS inventory control – The licensee provided information regarding the analysis from WCAP-17601 applicable to DCPP in response to NRC staff requests. The NRC staff is continuing to review this information to ensure the licensee sufficiently justifies the analysis being applied. Additional information may be needed to confirm appropriate use of the analysis.*

Response: PG&E notes that the NRC staff is continuing to review information regarding the analysis from WCAP-17601 applicable to DCPP in response to NRC staff requests. PG&E will provide additional information, if required, in a future six-month status update.

Confirmatory Item 3.2.1.1.A

*Due to the concern that the reliance on NOTRUMP code for the ELAP analysis of Westinghouse plants is limited to the flow conditions prior to reflux condensation initiation, provide an acceptable definition for reflux condensation cooling in the context of this analysis.*

Response: PG&E has used site specific ELAP analyses performed with the NOTRUMP computer code to support the mitigating strategy in its OIP. The use of NOTRUMP was limited to the thermal-hydraulic conditions before reflux condensation initiates. The initiation of reflux condensation cooling is defined when the one hour centered moving average of the flow quality at the top of the steam generator U-tube bend exceeds 0.1 in any one loop.

This confirmatory item is complete.

Confirmatory Item 3.2.1.2.A

*Provide justification (to include the applicable analysis and relevant seal leakage testing data) that the integrity of the associated O-rings will be maintained at the temperature conditions experienced during the ELAP event.*

Response: PG&E will provide justification that the integrity of the associated O-rings will be maintained at the temperature conditions experienced during the ELAP event in a future six-month status update. The justification will include the applicable analysis and relevant seal leakage testing data.

Confirmatory Item 3.2.1.2.B

*Some Westinghouse plants have installed or will install the SHIELD shutdown seals, or other types of low leakage seals and have credited or will credit a low seal leakage rate (e.g., 1 gpm/seal) in the ELAP analyses for the RCS response. Information should be provided to address the impacts of the Westinghouse 10 CFR Part 21 report, "Notification of the Potential Existence of Defects Pursuant to 10 CFR Part 21," dated July 26, 2013 (ADAMS Accession No. ML13211A168) on the use of the low seal leakage rate in the ELAP analysis.*

Response: PG&E will provide information to address impacts of the Westinghouse 10 CFR Part 21 report, "Notification of the Potential Existence of

Defects Pursuant to 10 CFR Part 21," dated July 26, 2013, on the use of low seal leakage rate in the ELAP analysis in a future six-month status update.

Confirmatory Item 3.2.1.2.C

*Should the seals be changed to the newly designed Generation 3 SHIELD seals or non-Westinghouse seals, the licensee should address the acceptability of the use of the newly designed Generation 3 SHIELD seals or non-Westinghouse seals and justification for the RCP seal leakages rates for use in the ELAP analysis.*

Response: PG&E will provide justification for the acceptability of the use of the newly designed Generation 3 SHIELD seals or non-Westinghouse seals RCP seal leakage rates for use in the ELAP analysis in a future six-month status update.

Confirmatory Item 3.2.1.4.A

*The licensee used the Modular Accident Analysis Program (MAAP) code in performing its ELAP analyses. Aspects of the MAAP code analyses, such as boundary conditions, nodalization, and the selection of code options for modeling key physical phenomena, were not discussed in the Integrated Plan. Provide an understanding of the above issues to assess the technical adequacy of the code and determining the code's range of applicability.*

Response: PG&E will provide information on the Modular Accident Analysis Program (MAAP) code used in performing the ELAP analysis to show the technical adequacy of the code and the code's range of applicability in a future six-month status update.

Confirmatory Item 3.2.1.6.A

*On pages 70 through 73 in the Integrated Plan, the licensee listed elapsed times and time constraints in different columns in Attachment 1A (sequence of events timeline). The review determined that the times listed in the elapsed time column and the time constraint column often are the same and provide no margin between the elapsed time and the time constraint time. Provide clarification on how early a step must be begun to meet the time constraint, when the licensee actually expects to begin performing the step, and information on what margin exists for these critical actions, and whether the time can be reasonably met.*

Response: PG&E will provide clarification on how early a step must be begun to meet the time constraint, when it is expected to begin performing the step, information on what margin exists for these critical actions, and whether the time can be reasonably met in a future six-month status update.

Confirmatory Item 3.2.4.3.A (049-RAI-DCPP-071)

*Heat Tracing – The licensee is considering a minimum design temperature of 24 degrees F. As a result, the effect of the lower temperature on the BASTs is being re-evaluated.*

Response: PG&E is currently evaluating the effect of the lower temperature on the boric acid storage tanks and will provide an update of the results in a future six-month status update.

Confirmatory Item 3.2.4.4.A

*Communications – Confirm that upgrades to the site's communications systems have been completed.*

Response: PG&E will confirm the completion of the upgrades to the site's communications systems in a future six-month status update.

Confirmatory Item 3.2.4.6.A

*Confirm personnel protective measures for operator protection should entry into the TDAFW pump room be necessary following an ELAP.*

Response: PG&E will confirm personnel protective measures for operator protection should entry into the turbine-driven auxiliary feedwater pump room be necessary following an ELAP in a future six-month status update.

Confirmatory Item 3.2.4.8.A

*Confirm protective features of the Class 1E circuit breaker will be evaluated by engineering calculation to adequately protect the bus, and that all load breakers be disabled (dc switch open) prior to energizing the 4-KV bus with FLEX DG.*

Response: PG&E will confirm protective features of the Class 1E circuit breaker will be evaluated by engineering calculation to adequately protect the bus, and that all load breakers be disables (dc switch open) prior to engineering the 4-kV bus with FLEX diesel generator in a future six-month update.

Confirmatory Item 3.2.4.10.A

*The licensee has not informed the NRC of their plan to abide by the generic resolution related to extended battery duty cycles, or their plans to address potential plant-specific issues associated with implementing this resolution.*

Response: PG&E will provide its plan to abide by the generic resolution related to extended battery duty cycles, or plans to address potential plant-specific issues associated with implementing this resolution, in a future six-month status update.

Confirmatory Item 3.3.1.A

*During the audit, the licensee stated that maintenance of all equipment associated with all FLEX strategies will be in accordance with NEI 12-06, Section 11. Preventative maintenance requirements for this equipment will be established in accordance with the requirements of EPRI Technical Report No. 30020000623, "Preventative Maintenance Basis for FLEX Equipment" and all associated data reports. Provide clarification of the alignment of the licensee referenced reports and those endorsed by the NRC staff.*

Response: EPRI Technical Report No. 3002000623, "Nuclear Maintenance Applications Center: Preventive Maintenance Basis for FLEX Equipment," was endorsed by the NRC on October 7, 2013. Preventative maintenance requirements for FLEX equipment will be established in accordance with this NRC endorsed document and all associated data reports.

This confirmatory item is complete.

Confirmatory Item 3.4.A

*NEI 12-06, Section 12.2 lists minimum capabilities for offsite resources for which each Licensee should establish the availability. Discuss implementation of Guidelines 2 through 10 in NEI 12-06, Section 12.2.*

Response: PG&E will discuss the implementation of Guidelines 2 through 10 in NEI 12-06, Section 12.2, in a future six-month status update.

## 9. Planned Communications Equipment Status Updates

PG&E submitted its response to a RAI regarding the Recommendation 9.3 Communications Assessment in PG&E Letter DCL-12-110, "Pacific Gas and Electric Company's Response to Recommendation 9.3 Communications Requests 1 and 3 and the Evaluation of Existing Communications Systems Power Supplies," dated October 29, 2012, (Reference 4). In its response, PG&E committed to provide a status update of the planned communications equipment in the six-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2. The following provides a summary of the planned communication equipment status update items documented in PG&E Letter DCL-13-012, "30-Day Response to Request for Additional Information Regarding the Recommendation 9.3 Communications Assessment," dated February 21, 2013 (Reference 5) and the status of each.

Communication Item 1:

As discussed in Reference 5, PG&E would procure additional hand held satellite phones, batteries, and chargers that will be provided with portable generator back-up power by December 31, 2013.

Reference 3 concluded that a total of 9 satellite phones, 27 satellite phone batteries, and 5 multi-unit satellite phone chargers are required to ensure that the control room, technical support center, and emergency operations facility have a dedicated line to perform State and County notifications. In addition, concluded that 8 satellite phones, 18 satellite phone batteries, and 5 multi-unit satellite phone chargers need to be procured.

Status:

(1) PG&E has received an additional 8 satellite phones and placed into service 9 satellite phones. This item is complete.

(2) PG&E has received 18 satellite phone batteries. This item is complete.

(3) PG&E has received 5 multi-unit satellite phone chargers. This item is complete.

(4) Refer to Communications Item 5 for a status of the portable diesel generators. Until the portable diesel generators are received and placed in service, the hand held satellite phone chargers will be provided with back-up power using the communications trailer diesel generator. Procedure OP K-9, "Operation of the DCPP Radio Systems and BDB Communications Equipment," Revision 13 was issued on December 23, 2013, providing instructions to charge the satellite phone chargers with the communications trailer.

Communication Item 2:

As discussed in Reference 4, PG&E will install a fixed satellite phone with an external antenna in the Sheriff Watch Commander's office by October 27, 2015. As discussed in Reference 5, back-up power for the Sheriff Watch Commander's fixed satellite phone will be provided by an existing diesel generator with a 1000-gallon tank that is capable of providing 120 hours of power.

Status: The installation of the Sheriff Watch Commander's fixed satellite phone and antenna is on schedule.

Communications Item 3:

As discussed in Reference 5, PG&E will procure additional single and dual band radio batteries and chargers that will be provided with portable generator back-up power by October 27, 2015.

Based on the radio specifications in Reference 5, Reference 3 concluded that a total of 160 dual band radio batteries, 150 single band radio batteries, 14 6-unit and 20 single-unit dual band chargers, and 13 6-unit and 20 single-unit single band chargers are required to maintain communications within a 24 hour period. Reference 3 also stated that 80 dual band radio batteries and 75 single band radio batteries need to be procured.

Status:

(1) The procurement of the additional single and dual band radio batteries is on schedule.

(2) PG&E has 14 6-unit and 20 single-unit dual band chargers, and 13 6-unit and 20 single-unit single band chargers. This item is complete.

(3) Refer to Communications Item 5 below for a status of the portable diesel generators.

Clarification: As discussed in Reference 5, the single band radios have a talk time of 10 hours and a recharge time of 2 hours and the dual band radios have a talk time of 8 hours and a recharge time of 2 hours.

The single and dual band radios talk time of 10 and 8 hours respectively is based on a 5/5/90 talk cycle. A 5/5/90 talk cycle is broken into three categories based on radio usage: transmits 5 percent, receives 5 percent, and is idle 90 percent.

Communications Item 4:

As discussed in Reference 4, PG&E will improve operation support center (OSC) communications by installing a radio console. Radios, batteries, and chargers will be relocated to support continued radio communications. This equipment will be placed in service with approved procedures as part of Phase 2, which is scheduled for October 27, 2015.

As discussed in Reference 5, PG&E committed to procure portable generators and equipment to ensure that adequate power will exist to support extended operations. Refer to Communications Item 5 for a status of the portable generators. The OSC will be equipped with a portable diesel generator, with a 24-hour fuel tank capacity, to provide power to lights and communications equipment.

Status: The OSC communications improvements are on schedule.

Communications Item 5:

As discussed in Reference 4, PG&E will procure portable generators and equipment to ensure that adequate power will exist to support extended operations. This equipment will be placed in service with approved procedures as part of Phase 2, which is scheduled for October 27, 2015.

Status: The portable generator enhancements are on schedule.

Communications Item 6:

As discussed in Reference 4, PG&E will relocate the SmartMsg and Zetron pager systems from their current location to an existing structure that is seismically robust. This will be completed by October 27, 2015.

As discussed in Reference 5, the paging system battery will be battery backed, with a dedicated cable from a portable diesel generator, to ensure that adequate power will exist to support extended operations beyond 24 hours. Refer to Communications Item 5 above for a status of the portable generators.

Status: The relocation of the SmartMsg and Zetron pager systems is on schedule.

Communications Item 7:

As discussed in PG&E Letter DCL-13-081, PG&E will establish credited manual actions and their procedures in accordance with NEI 12-01 and NRC Order EA-12-049. Credited manual actions and procedures for the Phase 1 communications are scheduled to be completed by December 31, 2013. Credited manual actions and procedures for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Status: Procedure OP K-9, "Operation of the DCPP Radio Systems and BDB Communications Equipment," provides instructions on the use of the Phase 1 communications equipment. PG&E concluded that there were no credited manual actions for Phase 1 communications. Phase 1 of this item is complete.

Completion of Phase 2 credited manual actions and their procedures are on schedule.

Communications Item 8:

As discussed in Reference 3, PG&E will establish maintenance procedures for the planned enhancements, including operability testing, in accordance with NEI 12-01 and NRC Order EA-12-049. Maintenance procedures for the Phase 1 communications are currently scheduled to be completed by December 31, 2013. Maintenance procedures for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Status: PG&E issued temporary procedure TP TA-13002, "Maintenance and Inventory of the Beyond Design Basis Communications Equipment," Revision 0 on December 30, 2013. TP TA-13002 provides maintenance instructions, including operability testing, for the Phase 1 communications equipment. Phase 1 of this item is complete. A permanent procedure for maintenance of the Phase 1 communications will be completed with Phase 2 procedures. Completion of Phase 2 maintenance procedures are on schedule.

Communications Item 9:

As discussed in Reference 3, PG&E will establish periodic inventory checks for the planned enhancements in accordance with NEI 12-01 and NRC Order EA-12-049. Periodic inventory checks for the Phase 1 communications are currently scheduled to be completed by December 31, 2013. Periodic inventory checks for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

> Status: PG&E issued temporary procedure TP TA-13002 on December 30, 2013. TP TA-13002 provides inventory instructions for the Phase 1 communications equipment. A permanent procedure for inventory checks of the Phase 1 communications will be completed with Phase 2 procedures. Phase 1 of this item is complete. Completion of Phase 2 inventory procedures are on schedule.

Communications Item 10:

As discussed in PG&E Letter DCL-13-081, training plans will be developed for response personnel in plant groups such as the emergency response organization, fire, security, emergency planning, operations, engineering, and maintenance. The training plans 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. Training for applicable plant staff on the Phase 1 communications equipment is currently scheduled to be completed by December 31, 2013. Training for plant staff on the Phase 2 communications equipment is currently scheduled to be completed by October 27, 2015.

> Status: Training plans for response personnel were developed in accordance with the systematic approach to training process. Operations and emergency response organization personnel completed training on the Phase 1 communications equipment on December 17, 2013. Phase 1 of this item is complete. Completion of Phase 2 plant staff training is on schedule.

## 10. Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

## 11. References

The following references support the updates to the OIP described in this enclosure:

(1) PG&E Letter DCL-13-007, "Pacific Gas and Electric Company's Overall Integrated Plan 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)," dated February 27, 2013

(2) 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

(3) PG&E Letter DCL-13-081, "Pacific Gas and Electric Company's First Six-Month 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," dated August 22, 2013

(4) PG&E Letter DCL-12-110, "Pacific Gas and Electric Company's Response to Recommendation 9.3 Communication Requests 1 and 3 and the Evaluation of Existing Communications Systems Power Supplies," dated October 29, 2012

(5) PG&E Letter DCL-13-012, "30-Day Response to Request for Additional Information Regarding the Recommendation 9.3 Communications Assessment," dated February 21, 2013

(6) 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

(7) NRC Interim Staff Guidance, "Diablo Canyon Power Plant, Unit Nos. 1 and 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC Nos. MF0958 and MF0959)," dated February 3, 2014

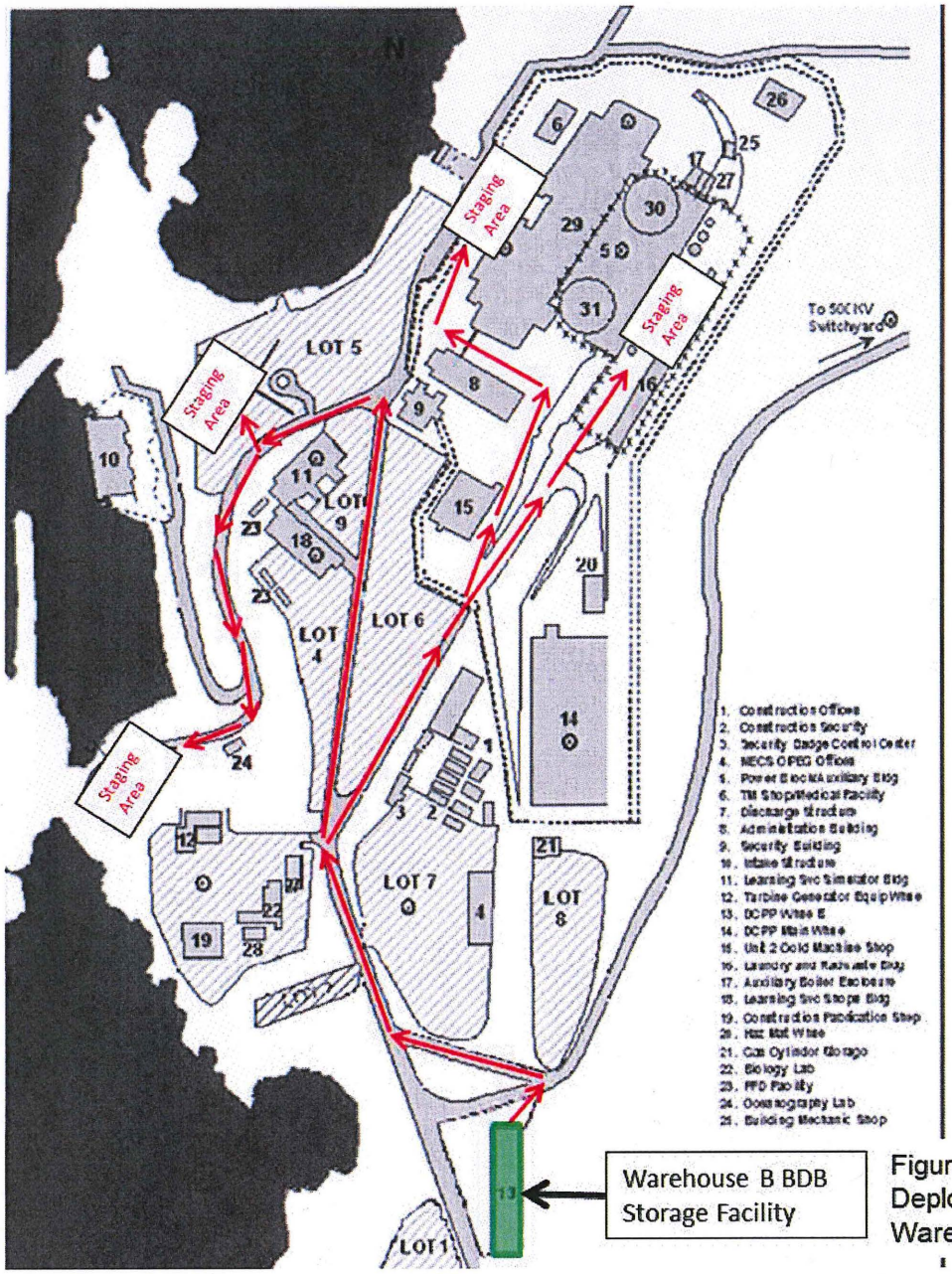


Figure 1
Deployment Routes
Warehouse B BDB Storage Facility

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 comply with the requirement identified by the NRC staff in the letter dated January 8, 2014 regarding the boron mixing issue for PWRs (Adams Accession No. ML13276A183). The NRC letter states that the NRC staff has reviewed the information submitted to date and concluded that use of the industry approach dated August 15, 2013, entitled "Westinghouse Response to NRC Generic Request for Additional Information (RAI) on Boron Mixing in Support of the Pressurized Water Reactor Owners Group (PWROG)," ML13235A135, is acceptable with clarifications listed in the letter. | Fall 2015 |