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January 18, 2002

PG&E Letter DCL-02-004

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

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Response to NRC Regulatory Issue Summary 2001-21

Dear Commissioners and Staff:

NRC Regulatory Issue Summary (RIS) 2001-21, "Licensing Action Estimates for Operating Reactors," dated November 16, 2001, requested that all power reactor licensees provide, on a voluntary basis, estimates of the number of new licensing action requests they plan to submit in NRC fiscal years 2002 and 2003. RIS 2001-21 also requests licensees to identify by brief title those submittals expected to generate complex reviews, particularly any power uprate requests, license renewal requests, license transfer applications, or dry cask storage applications.

RIS 2001-21 identifies licensing actions to include requests for license amendments, license renewals, transfers or conversions, exemptions, relief from inspection and surveillance requirements, review of topical reports submitted on a plant-specific basis, power uprate requests, dry cask storage applications, Owners Group initiatives (topical reports), Technical Specification Task Force initiatives, and other licensee requests requiring the expenditure of NRC resources.

PG&E is a participant in an industry consortium of six plants as a result of a mutual agreement known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of six plants operated by Wolf Creek Nuclear Operating Corporation, TXU Electric, AmerenUE, PG&E, STP Nuclear Operating Company, and Arizona Public Service. PG&E currently plans to submit 52 plant specific licensing action requests during NRC fiscal year 2002 and 64 licensing action requests in fiscal year 2003. Through the STARS cooperative effort, PG&E is participating in 18 licensing action requests during fiscal year 2002 and 34 licensing action requests in fiscal year 2003. The number of common STARS group submittals may vary due to some plants already having approval of the

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licensing action request that the other STARS members are requesting or the licensing action request not being applicable to a specific member. The method utilized for counting the number of licensing actions for a multi-unit licensee was performed consistent with footnote 1 of RIS 2000-04, "Operation Reactor Licensing Action Estimates.

Additionally, included as part of the plant specific action requests mentioned above, PG&E has submitted a dry cask storage application and a license transfer application during fiscal year 2002 and may submit a power uprate request to recapture measurement uncertainty during fiscal year 2003. It is anticipated that these licensing actions will entail complex reviews.

RIS 2001-21 provided a table that licensees can use to document their estimates of licensing actions for the next two fiscal years. This table included providing an estimated date of submittal and estimated safety and operational benefits. The STARS members typically provide to their NRC Project Manager a status of licensing actions, which typically includes an estimated date of submittal, if known. The estimated safety and operational benefit information is not readily available. As such, the STARS group does not intend to provide this information in response to RIS 2001-21.

If you have any questions concerning this submittal, please contact Mr. Pat Nugent at (805) 545-4720.

Sincerely,

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