



**Pacific Gas and
Electric Company**

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PG&E Letter DCL-05-110

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

Withdrawal of License Amendment Request 04-09, Relocation of Technical
Specification Cycle Specific Parameters to the Core Operating Limits Report

Dear Commissioners and Staff:

Pacific Gas and Electric Company (PG&E) Letter DCL-04-178, dated December 28, 2004, submitted License Amendment Request (LAR) 04-09, "Relocation of Technical Specification Cycle-Specific Parameters to the Core Operating Limits Report." LAR 04-09 proposes relocating certain reactor coolant system related cycle-specific parameters from the Technical Specifications (TS) to the Core Operating Limits Report (COLR) for Diablo Canyon Power Plant Units 1 and 2. The justification to implement this expansion of the COLR is provided in Westinghouse WCAP-14483-A, "Generic Methodology for Expanding Core Operating Limits Report," approved by the NRC on January 19, 1999. The proposed changes are consistent with NRC-approved Technical Specification Task Force (TSTF) Traveler No.-339, Revision 2, "Relocate TS Parameters to COLR."

PG&E considered the proposed changes to be consistent with NRC Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications," dated October 3, 1988, which provides guidance to licensees for the removal of cycle-dependent variables from the TS, provided that the values of these variables are included in a COLR and are determined with NRC-approved methodology, which is referenced in the TS.

The NRC has approved similar changes for other plants including Byron/Braidwood and Wolf Creek.

A request for additional information, received by PG&E on February 16, 2005, asked that PG&E identify and include in the TS other topical reports, computer codes, departure from nucleate boiling ratio correlations, etc., that are used to determine the COLR parameters but not previously identified or included in the TS. This deviation from the NRC-approved TSTF-339 negates the burden reduction intent of the associated TS changes. In calls with the staff regarding the scope of their

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request, the staff indicated that they have recently identified that previous approvals of COLR-related amendments may not have met the intent of 10 CFR 50.36, and that they intend to issue a generic communication providing additional guidance to the industry. No date has been established for issuance of the revised guidance.

Pending issuance of the revised guidance, PG&E withdraws LAR 04-09. PG&E will review the revised guidance when issued, and consider resubmittal of the LAR at that time.

If you have any questions, or require additional information, please contact Stan Ketelsen at (805) 545-4720.

Sincerely,

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