



**Pacific Gas and
Electric Company®**

Diablo Canyon Power Plant
P. O. Box 56
Avila Beach, CA 93424

March 03, 2006

PG&E Letter DCL-2006-509

Certified Return Receipt
7003 3110 0005 7002 5345

Roger Briggs
Executive Officer
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista, Suite #101
San Luis Obispo, CA 93401-7906

Request for Concurrence on Proposed Re-routing of Storm Water at Diablo Canyon Power Plant (DCPP)

Dear Mr. Briggs:

As required by DCP's NPDES Permit Order No. 90-09, DCP requests Executive Officer concurrence in the proposed re-routing of storm water described below. DCP has started the preliminary steps in the construction of the site Independent Spent Fuel Storage Installation (ISFSI). One component of the project is to provide for the relocation of existing roadways immediately North of the DCP South Warehouse (Warehouse B Building) further inland. The current intersection of the plant site access roadway, and the roadway that leads to the ISFSI area, is located near South Cove (Patton Cove), an area subject to degrading soils stability caused by a slow slide of earthen material toward Patton Cove. The roadway relocations being implemented as part of the ISFSI project should provide additional stability to this area.

As part of the overall effort to stabilize the Patton Cove area, DCP proposes to re-route storm water run-off from the majority of the ridgeline watershed that currently outfalls at Discharge 006 to Discharge 005. The change will significantly reduce the volume of storm water currently directed to, and through, the Patton Cove bluff. Furthermore, with the potential for increasing soils instability in the area and associated potential for damage to engineered structures located within the Patton Cove bluff, reduction in the volume of transiting storm water would reduce the possibility for significant erosion and further destabilization of the bluff in the event of culvert or conduit degradation.

In accordance with Order No. 90-09, NPDES No. CA0003751, Section D. Provisions, 6., Re-routing of in-plant waste streams identified in Finding No. 4 or shown on Attachment "C" may be made with the concurrence of the Executive Officer. Both storm water Discharge Points 005 and 006 are identified in Order No. 90-09 Finding No. 4 and on Attachment C.

The current DCP NPDES Permit description for Discharge 005, Yard Storm Drains, Flow Variable, is:
"Storm water runoff from the plant yard on the Unit 2 side of the radwaste buildings and the west side of the turbine buildings is discharged to South Cove. This may occasionally include some firewater (see note 1), washwater and stored water releases. Rain water and washwater from the rotor warehouse and adjacent areas is collected in a sump and routed into this drainage system."

C001



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The current DCPD NPDES Permit description for Discharge 006, Storm Water Runoff, Flow Variable, is:
"Storm water runoff from the Pacific Ocean side of the ridge to the southeast of the plant is discharged to South Cove. Storm water runoff from the south warehouse, the shooting range, and a temporary parking lot also drains to this discharge."

The proposed re-routing will result in the *"runoff from the Pacific Ocean side of the ridge to the southeast of the plant"* from Discharge 006 being re-directed to Discharge 005. The other components of Discharge 006 will remain unchanged. Both Discharge 005 and Discharge 006 flow into Patton Cove. Thus, there is no change to the receiving water for either discharge point. Further, the re-routing will not impact Permit Monitoring and Reporting Program requirements. Currently, Discharge 005 is subject to grease & oil analysis through an annual grab sample. This requirement would remain unchanged.

DCPD requests your concurrence with the proposed re-routing of a portion of storm water flow from Discharge 006 to Discharge 005. An enclosed statement has been provided to record and communicate your concurrence. A self-addressed, stamped envelope for return of the document has also been provided.

If you have any questions or concerns regarding this matter, or require additional information, please contact Bryan Cunningham of my staff at (805) 545-4439.

Sincerely,

James R. Becker
Vice President – Diablo Canyon Operations and Station Director

2006509/bkc/kmo

Enclosures



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cc: w/ encl.

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