



**Pacific Gas and
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June 7, 2012

PG&E Letter DCL-12-060

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

10 CFR 50.54(f)

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 Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident

Reference:

1. 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

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 1 of Reference 1 contains specific Requested Actions, Requested Information, and Required Responses associated with Recommendation 2.1, Seismic Evaluations. Reference 1 requires that, if an addressee cannot meet the requested response date, it must provide a response to the NRC within 90 days of the date of the information request describing the licensee's proposed alternative course of action, the basis for the acceptability of the proposed alternative course of action, and the estimated completion dates.

Pacific Gas and Electric Company (PG&E) cannot determine if it can meet the requested response dates for submitting the Seismic Hazard Evaluation and the Seismic Risk Evaluation (items 1 through 9 of Reference 1) until the Screening, Prioritization and Implementation Details (SPID) guidance is endorsed by the NRC.

Within 60 days of NRC endorsement of the SPID guidance, PG&E will assess whether it can meet the submittal deadlines for the Seismic Hazard Evaluation and Seismic Risk Evaluation, and submit: (1) its intention to follow the endorsed guidance, or (2) an alternative approach.



The response date for Diablo Canyon Power Plant's (DCPP's) Seismic Hazard Evaluation is March 12, 2015. The following provides PG&E's proposed alternative course of action with respect to performance of a Senior Seismic Hazard Analysis Committee (SSHAC) Level 3 in accordance with NUREG-2117 for Ground Motion Characterization (GMC) and Seismic Source Characterization (SSC).

PG&E will perform a SSHAC Level 3 in accordance with NUREG-2117 for GMC and SSC, and plans to meet the schedule for completion of the subsequent Seismic Hazards Evaluation for DCPP specified in Reference 1. However, an alternate plan may be necessary because the number of personnel available with the level of seismic expertise necessary to participate in the SSHAC process for Western United States (WUS) nuclear power plants is limited. The WUS plants will be performing 6 to 8 SSHACs within this 3-year period. This resource limitation has the potential to delay the development of the new models needed for performance of the Seismic Hazards Evaluation within 3 years.

PG&E is currently retaining experts and coordinating with other WUS nuclear plant licensees concerning the performance of the required SSHAC Level 3 activities. Completion of these actions will permit PG&E and the other WUS plants to better estimate the time frames needed for implementation of the SSHAC Level 3 process. If it is determined that PG&E will be unable to implement these activities on a schedule that supports completion of a Seismic Hazards Evaluation for DCPP by March 12, 2015, as required by Reference 1, PG&E proposes to meet with the NRC to agree upon a new completion date. Additionally, if resource constraints develop during the estimated 2.5 years it will take to complete the SSHAC Level 3 process, PG&E proposes to meet with the NRC to develop a revised mutually agreeable schedule. Any revised schedule would consider prioritization of the limited available resources for the WUS sites.

PG&E believes that this course of action is acceptable because it will result in performance of the SSHAC process and Seismic Hazards analysis as soon as reasonably possible for DCPP in light of limited seismic resources and in accordance with applicable NRC guidance.

PG&E is making regulatory commitments (as defined by NEI 99-04) in the Enclosure of this letter. This letter includes no revisions to existing regulatory commitments.

If you have any questions, or require additional information, please contact Mr. Jearl Strickland at (805) 781-9785.

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

Executed on June 7, 2012.



Sincerely,

A handwritten signature in blue ink, appearing to read 'E. Halpin'.

Edward D. Halpin
Senior Vice President – Chief Nuclear Officer

ckf6/SAPN 50465913-6
Enclosure

cc: Diablo Distribution
cc:/enc: Elmo E. Collins, NRC Region IV
Eric J. Leeds, NRC Director, Office of Nuclear Reactor Regulation
Michael S. Peck, NRC, Senior Resident Inspector
Joseph M. Sebrosky, NRR Project Manager

Regulatory Commitments

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

Commitment	Due Date
PG&E will assess whether it can meet the submittal deadlines for the Seismic Hazard Evaluation and Seismic Risk Evaluation, and submit: (1) its intention to follow the endorsed guidance, or (2) an alternative approach.	Within 60 days of NRC endorsement of the SPID guidance