



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 18, 2012

Mr. Edward D. Halpin  
Senior Vice President and  
Chief Nuclear Officer  
Pacific Gas and Electric Company  
Diablo Canyon Power Plant  
P.O. Box 56, Mail Code 104/6  
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 – NUCLEAR  
REGULATORY COMMISSION BULLETIN 2011-01, "MITIGATING  
STRATEGIES" (TAC NOS. ME6425 AND ME6426)

Dear Mr. Halpin:

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The purpose of the bulletin was to obtain a comprehensive verification that licensees' mitigating strategies to maintain or restore core cooling, spent fuel cooling, and containment following a large explosion or fire were compliant with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2).

The bulletin required two sets of responses pursuant to the provisions of 10 CFR 50.54(f). By letters dated June 10 and July 11, 2011 (ADAMS Accession Nos. ML111640426 and ML111930165, respectively), Pacific Gas and Electric (the licensee) provided its responses to the bulletin for Diablo Canyon Power Plant, Units 1 and 2. By letter dated November 28, 2011 (ADAMS Accession No. ML113260090), the NRC sent the licensee a request for additional information (RAI) on its July 11, 2011, response. The licensee responded to the RAI by letter dated December 21, 2011 (ADAMS Accession No. ML113570168).

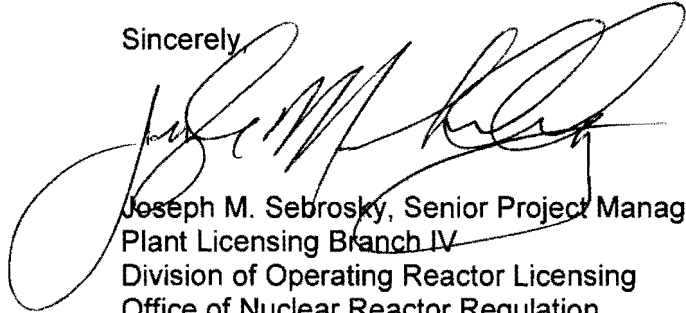
The NRC staff has reviewed the information submitted by the licensee and concludes that its response to the bulletin is acceptable. As summarized in the enclosure, the NRC staff verified that the licensee provided the information requested in the bulletin and no further information or actions under the bulletin are requested.

E. Halpin

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If you have any questions, please contact Joseph M. Sebrosky at 301-415-1132 or by e-mail at [Joseph.Sebrosky@nrc.gov](mailto:Joseph.Sebrosky@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. M. Sebrosky', is written over the typed name and title.

Joseph M. Sebrosky, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

## SUMMARY OF NRC REVIEW OF LICENSEE'S RESPONSES TO NRC

### BULLETIN 2011-01, "MITIGATING STRATEGIES"

#### PACIFIC GAS AND ELECTRIC COMPANY

#### DIABLO CANYON POWER PLANT, UNITS 1 AND 2

#### DOCKET NOS. 50-275 AND 50-323

### 1.0 INTRODUCTION

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The bulletin required two sets of responses pursuant to the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(f). The first responses were due 30 days after issuance of the bulletin. By letter dated June 10, 2011 (ADAMS Accession No. ML111640426), Pacific Gas and Electric (PG&E or the licensee) provided its response to this first set of questions (first response) for Diablo Canyon Power Plant (DCPP), Units 1 and 2. The second responses were due 60 days after issuance of the bulletin. By letter dated July 11, 2011 (ADAMS Accession No. ML111930165), PG&E provided its response to this second set of questions (second response). By letter dated November 28, 2011 (ADAMS Accession No. ML113260090), the NRC sent a request for additional information (RAI) on the second response. PG&E responded to the RAI by letter dated December 21, 2011 (ADAMS Accession No. ML113570168). As summarized below, the NRC staff has verified that PG&E provided the information requested in the bulletin.

### 2.0 BACKGROUND

On February 25, 2002, the NRC issued EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures" (ICM Order) (ADAMS Accession No. ML020510635). Section B.5.b of the ICM Order required licensees to develop specific guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities using readily available resources (equipment and personnel) that can be effectively implemented under the circumstances associated with the loss of large areas of the plant due to explosions or fire.

By letter dated July 11, 2007 (ADAMS Accession No. ML071910037), the NRC staff issued its safety evaluation (SE) to document the final disposition of information submitted by PG&E regarding Section B.5.b of the ICM Order. Along with the SE, the staff issued a conforming license condition to incorporate the B.5.b mitigating strategies into the licensing basis.

On March 27, 2009, the NRC issued 10 CFR 50.54(hh)(2) as a new rule, in order to capture the B.5.b mitigating strategies and related license conditions as regulatory requirements for both current and future licensees. At that time, licensee compliance with the conforming license

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conditions was sufficient to demonstrate compliance with 10 CFR 50.54(hh)(2) (74 FR 13926; March 27, 2009) so no further actions were required on the part of current licensees.

### 3.0 30-DAY REQUEST

In order to confirm continued compliance with 10 CFR 50.54(hh)(2), the bulletin requested that licensees address the following two questions within 30 days of issuing the bulletin:

1. Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?
2. Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

The NRC staff reviewed PG&E's first response to determine if it had adequately addressed these questions.

#### 3.1 Question 1: Availability and Capability of Equipment

In its first response, PG&E confirmed that equipment it needs to execute the 10 CFR 50.54(hh)(2) mitigating strategies is available and capable of performing its intended function. The NRC staff verified that this confirmation covered equipment needed for each of the three phases of B.5.b mitigation strategies. Therefore, the NRC staff concludes that PG&E has adequately responded to Question 1.

#### 3.2 Question 2: Guidance and Strategies Can Be Executed

In its first response, PG&E confirmed that the guidance and strategies it has implemented for 10 CFR 50.54(hh)(2) are capable of being executed considering the current facility configuration, staffing levels, and staff skills. Since PG&E has considered its current facility configuration, staffing levels, and staff skills, and confirmed that it can execute its implemented guidance and strategies, the NRC staff concludes that PG&E has adequately responded to Question 2.

### 4.0 60-DAY REQUEST

The bulletin required a response to the following five questions within 60 days of issuing the bulletin:

1. Describe in detail the maintenance of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it is functional when needed.
2. Describe in detail the testing of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it will function when needed.

3. Describe in detail the controls for ensuring that the equipment is available when needed.
4. Describe in detail how configuration and guidance management is ensured so that strategies remain feasible.
5. Describe in detail how you ensure availability of offsite support.

The NRC staff reviewed PG&E's submittals to determine if it had adequately addressed these questions. This was accomplished by verifying that the submittals listed equipment, training, and offsite resources that were relied upon to make conclusions in the July 11, 2007, SE or are commonly needed to implement the mitigating strategies.

#### 4.1 Questions 1 and 2: Maintenance and Testing of Equipment

Questions 1 and 2 of the 60-day request required licensees to describe in detail the maintenance and testing of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it is functional when needed. In its second response, PG&E listed the equipment used to support the 10 CFR 50.54(hh)(2) mitigating strategies which receives maintenance or testing. For each item, PG&E described the maintenance and testing performed, including the frequency and basis for the maintenance or testing activity.

The NRC staff verified that PG&E listed equipment that typically requires maintenance or testing which was relied upon to make conclusions in the SE or commonly needed to implement the mitigating strategies. In its second response, PG&E stated that the fire trucks, portable pumps, portable power supplies, hoses, and communications equipment receive maintenance or testing. PG&E did not identify maintenance or testing of monitor nozzles, spray nozzles, or similar devices in its second response. In its RAI response, PG&E stated that it will include inspection of its monitor nozzles as part of its inventory process, and that other nozzles are inspected as part of its fire protection program. In its RAI response, PG&E described how it ensures sufficient fuel for its fire engine. PG&E also identified other items that support the mitigating strategies that receive maintenance or testing.

The NRC staff verified that PG&E described the process used for corrective actions and listed the testing performed to ensure that the strategies were initially feasible. PG&E stated in its second response that its 10 CFR Part 50, Appendix B, corrective action program is used to document equipment failure, establish priorities, and perform trending.

Based upon the above, the NRC staff concludes that PG&E has provided the information requested by Questions 1 and 2.

#### 4.2 Question 3: Controls on Equipment

Question 3 of the 60-day request required licensees to describe in detail the controls on equipment, such as inventory requirements, to ensure that the equipment is available when

needed. A list of inventory deficiencies and associated corrective actions to prevent loss was also requested.

The NRC staff verified that PG&E described its process for ensuring that B.5.b equipment will be available when needed. In its second response, PG&E identified equipment included in its inventory, the inventory frequency, storage requirements, and items verified. Items verified include proper quantity, location, and accessibility of equipment and controls on storage locations. PG&E states that at the time of its second response there were no outstanding inventory deficiencies that would render the strategies not viable.

The NRC staff verified that PG&E inventoried equipment which was relied upon to make conclusions in the SE or commonly needed to implement the mitigating strategies. In its second response, PG&E stated that procured non-permanently installed B.5.b equipment is inventoried at least annually in accordance with station procedures. The second response specifically states that the following items are included in the inventory: fire trucks; portable pumps; portable power supplies; hoses; communications equipment; nozzles; and connectors. PG&E also identified other items that support the mitigating strategies that are inventoried.

Based upon the above, the NRC staff concludes that PG&E has provided the information requested by Question 3.

#### 4.3 Question 4: Configuration and Guidance Management

Question 4 of the 60-day request required licensees to describe in detail how configuration and guidance management is assured so that the strategies remain feasible.

The NRC staff verified that PG&E described its measures to evaluate plant configuration changes for their effects on the mitigating strategies and to ensure its procedures are current. In its second response, PG&E stated that the design change process and procedure controls ensure that the mitigation strategies are current. PG&E states that the design change process requires an evaluation of impacts to the mitigation strategies and that procedure changes are validated to ensure that the B.5.b mitigating strategies remain viable.

The NRC staff verified that PG&E described measures it has taken to validate the procedures or guidelines developed to support the mitigating strategies. In its second response, PG&E identified testing in response to Question 2 that demonstrated the ability to execute some strategies. In its second response, PG&E also stated, in part, that "initially, mitigating strategies were validated by walkdowns, engineering evaluations, performance of the procedure, and/or table top reviews" and they were similarly revalidated in 2011.

The NRC staff verified that PG&E described the training program implemented in support of the mitigating strategies and how its effectiveness is evaluated. In its second response, PG&E identified the training provided to its operations personnel, emergency response organization, security personnel, and fire brigade. PG&E also identified the frequency with which each type of training is provided and the methods for training evaluating.

Based upon the above, the NRC staff concludes that PG&E has provided the information requested by Question 4.

#### 4.4 Question 5: Offsite Support

Question 5 of the 60-day request required licensees to describe in detail how offsite support availability is assured.

The NRC staff verified that PG&E listed the offsite organizations it relies upon for emergency response, including a description of agreements and related training. The NRC staff compared the list of offsite organizations that PG&E provided in its second response with the information relied upon to make conclusions in the SE. The NRC staff noted that the San Luis Obispo County Fire Department was not listed in the second response. In its RAI response, PG&E clarified that the California Department of Forestry and Fire Protection functions as the San Luis Obispo County Fire Department through a contract. PG&E stated that it maintains agreements or contracts with these offsite organizations, which are reviewed annually, and that these agreements were current at the time of its second response. PG&E also described the training and site familiarization it provides to these offsite organizations. PG&E stated that it reviewed its corrective action program back to 2008 and found no issues involving lapsed agreements related to offsite support for B.5.b events.

Based upon the above, the NRC staff concludes that PG&E has provided the information requested by Question 5.

#### 5.0 CONCLUSION

As described above, the NRC staff has verified that PG&E has provided the information requested in Bulletin 2011-01 for DCCP, Units 1 and 2. Specifically, PG&E responded to each of the questions in the bulletin as requested. The NRC staff concludes that PG&E has completed all of the requirements of the bulletin and no further information or actions under the bulletin are needed.

E. Halpin

- 2 -

If you have any questions, please contact Joseph M. Sebrosky at 301-415-1132 or by e-mail at [Joseph.Sebrosky@nrc.gov](mailto:Joseph.Sebrosky@nrc.gov).

Sincerely,

/RA/

Joseph M. Sebrosky, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:  
As stated

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