



**Pacific Gas and
Electric Company™**

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July 11, 2005

PG&E Letter HIL-05-008

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

Docket No. 72-27
Humboldt Bay Independent Spent Fuel Storage Installation
Submittal of the Revised Humboldt Bay Independent Spent Fuel Storage Installation
Physical Security Plan (TAC No. L23683)

Dear Commissioners and Staff:

By Pacific Gas and Electric Company (PG&E) Letter HIL-03-001, dated December 15, 2003, PG&E submitted an application to the Nuclear Regulatory Commission (NRC) for a 10 CFR 72 site-specific license to build and operate an Independent Spent Fuel Storage Installation (ISFSI) at the Humboldt Bay Power Plant (HBPP) site. By PG&E Letter HIL-03-002, dated December 15, 2003, PG&E submitted a proposed Physical Security Plan (PSP) for the Humboldt Bay ISFSI.

During a telephone conversation on May 19, 2004, the NRC requested additional information needed to continue their review of the Humboldt Bay ISFSI PSP. By PG&E Letter HIL-04-005, dated June 23, 2004, PG&E provided a response to the NRC request for additional information. The response included a revised draft of the Humboldt Bay ISFSI PSP.

Based on meetings between PG&E and the NRC held in Rockville, Maryland dated May 25, 2005 and at the HBPP site dated June 14, 2005, additional clarification was requested by the NRC. As a result, enclosed is a revision to the proposed Humboldt Bay ISFSI PSP, which addresses the NRC's request for additional clarification. Revision bars in the margins indicate where changes were made. A 10 CFR 73.51 compliance matrix has been included as Attachment 1 to the PSP.

The enclosure contains security safeguards information, and should be handled in accordance with 10 CFR 73.21.

As discussed with the NRC during a telephone conversation dated June 30, 2005, PG&E will submit the agreement to respond letters from local law enforcement agencies at a later date.

~~SECURITY SAFEGUARDS INFORMATION~~

(When separated from Enclosure attachment, handle this document as non-safeguards)



If you have any questions regarding this response, please contact
Mr. Terence Grebel at (805) 545-4160 or Mr. Zane Easley at (707) 444-0710.

Sincerely,

Gregory M. Rueger
Senior Vice President – Generation and Chief Nuclear Officer

emb/3522

Enclosure

cc: PG Fossil Gen HBPP Humboldt Distribution
cc/enc: James R. Hall

~~SECURITY SAFEGUARDS INFORMATION~~

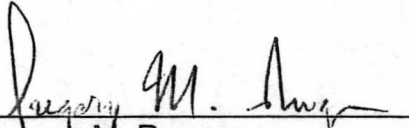
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

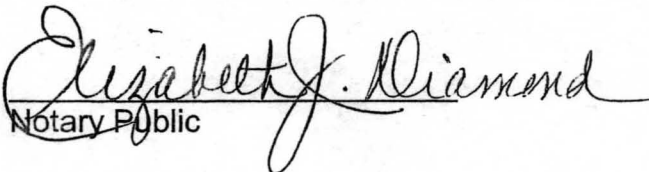
_____)	Docket No. 72-27
In the Matter of)	
PACIFIC GAS AND ELECTRIC COMPANY)	
)	
Humboldt Bay)	
Independent Spent Fuel Storage)	
Installation)	
_____)	

AFFIDAVIT

I, Gregory M. Rueger, being of lawful age, first being duly sworn upon oath say that I am Senior Vice President, Generation and Chief Nuclear Officer of Pacific Gas and Electric Company; that I have executed this response to an NRC request for additional clarification regarding the Humboldt Bay Independent Spent Fuel Storage Installation Physical Security Plan, that I am familiar with the content thereof; and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.


 Gregory M. Rueger
 Senior Vice President - Generation and Chief Nuclear Officer

Subscribed and sworn to before me on this 11th day of July, 2005, by
 Gregory M. Rueger, personally known to me or proved to me on the basis of
 satisfactory evidence to be the person who appeared before me.


 Notary Public

State of California
 County of San Francisco



PACIFIC GAS AND ELECTRIC COMPANY
HUMBOLDT BAY
INDEPENDENT SPENT FUEL STORAGE INSTALLATION
PHYSICAL SECURITY PLAN
DRAFT REVISION 2