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PG&E Letter DCL-15-099

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

10 CFR 50.4

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 Fifth Six-Month Status Report in Response to
March 12, 2012, Commission Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
(Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
2. PG&E Letter DCL-13-007, "Pacific Gas and Electric Company's Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013

Dear Commissioners and Staff:

On March 12, 2012, the Nuclear Regulatory Commission issued Reference 1 to Pacific Gas and Electric Company (PG&E) directing PG&E to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis (BDB) external event. Specific requirements are outlined in Reference 1, Attachment 2.

Pursuant to Reference 1, Section IV, Condition C, PG&E submitted its overall integrated plan for mitigation strategies for BDB external events in Reference 2.

Pursuant to Reference 1, Section IV, Condition C.2, and in accordance with the direction provided in NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," the enclosure to this letter provides PG&E's fifth six-month status report of its overall integrated plan.



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

If you have any questions, or require additional information, please contact Mr. Scott Maze at (805) 781-9791.

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

Executed on August 26, 2015.

Sincerely,

Barry S. Allen
Vice President, Nuclear Services

dmfn/SAPN 50466122-16

Enclosure

cc: Diablo Distribution
cc:/enc: Marc L. Dapas, NRC Region IV Administrator
William M. Dean, NRC/NRR Director
Siva P. Lingam, NRR Project Manager
John P. Reynoso, NRC Acting Senior Resident Inspector

Enclosure
PG&E Letter DCL-15-099

**Pacific Gas and Electric Company's Fifth Six-Month Status Report for the
Implementation of NRC Order EA-12-049**

Pacific Gas and Electric Company's Fifth Six-Month Status Report for the Implementation of NRC Order EA-12-049

1. Introduction

Pacific Gas and Electric Company (PG&E) developed an overall integrated plan (OIP) (Reference 1 [refer to Section 11 of this enclosure for a list of references]), documenting diverse and flexible strategies (FLEX), in response to Nuclear Regulatory Commission (NRC) Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (Reference 2). This enclosure provides the fifth update of milestone accomplishments since the submittal of Reference 1, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2. Milestone Accomplishments

As of July 31, 2015, PG&E had three milestone accomplishments since the submittal of PG&E Letter DCL-15-026, "Pacific Gas and Electric Company's Fourth Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 23, 2015 (Reference 3). These milestone accomplishments are that PG&E has completed the design of Phase 3 modifications and the Phase 2 Staffing Study and associated submittal.

3. Milestone Schedule Status

The following table provides an update to the milestone schedule status provided in Reference 3. It provides the activity status of each item, and a revised target completion date where applicable. The target dates are subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the Order implementation dates.

Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 20-day report	Apr 2012	Complete	
Submit 60-day status report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
Submit six-month status updates			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Complete	
Update 3	Aug 2014	Complete	
Update 4	Feb 2015	Complete	

Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Update 5	Aug 2015	Complete	
Update 6	Feb 2016	Not started	
Update 7	Aug 2016	Not started	
Modifications timeline			
Phase 1 Modifications			
a. Design	N/A	N/A	
b. Equipment Procurement	N/A	N/A	
c. Installation	N/A	N/A	
Phase 2 Modifications			
a. Design	2/28/15	Started	8/31/15
b. Large Equipment Procurement	12/31/14	Complete	
c. Ancillary Equipment Procurement	6/30/15	Started	10/27/15
d. Unit 1 Installation	10/30/15	Not started	
e. Unit 2 Installation	5/31/16	Not started	
Phase 3 Modifications			
a. Design	2/28/15	Complete	
b. Large Equipment Procurement	12/31/14	Complete	
c. Ancillary Equipment Procurement	6/30/15	Started	10/27/15
d. Unit 1 Installation	10/30/15	Not started	
e. Unit 2 Installation	5/31/16	Not started	
Procedure guidance implementation			
a. Unit 1 Strategies	10/30/15	Started	
b. Unit 2 Strategies	5/31/16	Started	
c. Unit 1 Maintenance	10/30/15	Started	
d. Unit 2 Maintenance	5/31/16	Started	
e. Unit 1 Testing	10/30/15	Started	
f. Unit 2 Testing	5/31/16	Started	
FLEX storage facilities			
a. Primary Storage Facility	4/1/15	Started	9/30/15
b. Secondary Storage Facility	8/1/15	Started	10/27/15
Staffing analysis			
a. Phase 1			
1. Study Complete	3/29/13	Complete	
2. NRC Submittal	4/30/13	Complete	
b. Phase 2			
1. Study Complete	5/27/15	Complete	
2. NRC Submittal	5/27/15	Complete	
Training completion for the strategies			
a. Unit 1	10/30/15	Started	
b. Unit 2	5/31/16	Started	
National SAFER Response Center 2 (Phoenix) operational	8/28/14	Complete	
Communications equipment			

Activity	Target Completion Date	Activity Status	Revised Target Completion Date
implementation (PG&E Letter DCL-12-110)			
a. Phase 1	12/31/13	Complete	
b. Phase 2	10/27/15	Started	
Unit 1 Walk-throughs or Demonstrations	10/30/15	Not started	
Unit 2 Walk-throughs or Demonstrations	5/31/16	Not started	
Unit 1 FLEX implementation complete	10/30/15	Not started	
Unit 2 FLEX implementation complete	5/31/16	Not started	

4. Changes to Compliance Method

The following identifies changes to Reference 3, as applicable, and the reason for each change. All changes meet applicable NEI 12-06 compliance methods.

Change 1 – “General Integrated Plan Elements”

- (1) “Discussion of time constraints identified in Attachment 1A”
 - (a) Item (15): The vital dc battery load shedding scheme has been revised to use Battery 1-3 (2-3) first and then Batteries 1-1 (2-1) and 1-2 (2-2) together after the first battery approaches depletion.
 - (b) Item (20): The revised vital dc battery load shedding scheme and associated revised load shed calculation results in Vital Battery 1-3 (2-3) providing power for at least 21 hours and Batteries 1-1 (2-1) and 1-2 (2-2) providing power for at least an additional 9 hours.

The load shedding scheme was revised to ensure either wide range steam generator (SG) level or narrow range SG with auxiliary feedwater (AFW) flow indication is available at all times.

- (2) Updated reference documents 4 and 12 from Reference 1 for current document revisions used in calculations and evaluations.

Change 2 – “Maintain Core Cooling and Heat Removal Strategy”

- (1) “Phase 2, Modifications”: Updated description of the primary connection point on the motor-driven AFW pump discharge crosstie to reflect the current design of adding an isolation valve and a threaded connection point rather than a flanged connection.

- (2) "Phase 3": Clarified that one train of cooling for each Unit would be repowered by a 4 kV generator set rather than a single generator.
- (3) "Phase 3, Strategy – Connections": Clarified that one train of cooling for each Unit would be repowered by a 4 kV generator set rather than a single generator.

Change 3 – "Maintain RCS Inventory Control Strategy"

- (1) "All Phases – Key reactor parameters": Clarified that the Reactor Vessel Level Instrumentation System (RVLIS) is a back up to pressurizer level as RVLIS will only be available when Vital Batteries 1-1 (2-1) and 1-2 (2-2) are in service together.
- (2) "Phase 2": Removed reference to the 480 volt (V) generator being prestaged in the radiological control area (RCA), as this equipment will be stored in the FLEX Storage Facilities. The storage location was changed during the detailed design of generator storage due to challenges related to permanent storage of the generator in the radiological controlled area.
- (3) "Phase 2": The 480 V generator will be staged at either the 115 ft elevation RCA bench area or the 85 ft elevation west of the turbine building near the turbine building machine shop to provide power to the Emergency Reactor Coolant Systems (ERCS) make-up pumps.
- (4) "Phase 2, Strategy – Equipment Storage – Pre-staging inside the RCS": Removed reference to the 480 V generator, as this equipment will be stored in the Primary Beyond-Design-Basis (BDB) Storage Facility.
- (5) "Phase 2, Strategy – Equipment Storage": Inserted row for equipment storage in the Primary BDB Storage Facility:

Equipment Storage – Primary BDB Storage Facility (Figure 1):	Equipment Storage – Primary BDB Storage Facility	Equipment Storage – Primary BDB Storage Facility:
A backup ERCS make-up pump, associated high-pressure hoses, a 480 V generator, and associated equipment will be stored at this facility. The pump, hoses, and generator will be transported to its staging location and deployed.	This storage facility will be located in Warehouse B as shown on Figure 1. Warehouse B will be upgraded to meet ASCE 7-10 per NEI 12-06, Section 5.3.1.1.b. The equipment at this facility will be protected in accordance with NEI 12-06,	N/A

	Section 5.3.1.	
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- (6) "Phase 2, Strategy – Equipment Storage – Secondary BDB Storage Facility": Removed reference to the backup ERCS make-up pump and associated high pressure hoses, as this backup equipment will be stored in the Primary BDB Storage Facility.

Change 4 – "Maintain Containment"

- (1) "All Phases, Key containment parameters": Containment temperature was added as a key containment parameter. Containment temperature can be monitored from the control room using the indicator on the post-accident monitoring panels.
- (2) "Phase 3": Clarified that one train of cooling for each Unit would be repowered by a 4 kV generator set rather than a single generator

Change 5 – "Maintain Spent Fuel Pool Cooling"

- (1) "Phase 2, Strategy – Equipment Storage": Storage boxes are being installed on the 140 ft elevation of the fuel handling building next to each spent fuel pool (SFP). These storage boxes will be anchored to the floor within the seismically qualified building. Hoses, fittings, nozzles, and associated equipment required to be deployed early in the Maintain SFP Cooling strategy will be stored in the boxes.
- (2) "Phase 3": Clarified that one train of cooling, including a SFP cooling pump, for each Unit would be repowered by a 4 kV generator set rather than a single generator.

Change 6 – "Safety Functions Support"

- (1) "Phase 1, Electrical": The revised vital dc battery load shedding scheme and associated revised load shed calculation results in Vital Battery 1-3 (2-3) providing power for at least 21 hours and Batteries 1-1 (2-1) and 1-2 (2-2) providing power for at least an additional 9 hours.

Change 7 – Attachment 1A, "Sequence of Events Timeline"

- (1) Action Item 20: Revised elapsed time, action, and time constraint for switching from Battery 1-3 (2-3) to Batteries 1-1 (2-1) and 1-2 (2-2) to align

with the changes to the dc battery load shedding scheme and timing as described in Change 1, Item 1 of this document.

- (2) Action Item 24: Elapsed time and time constraint to repower battery chargers to align with the changes to the dc battery load shedding scheme and timing as described in Change 1, Item 1 of this document.

Change 8 – OIP Attachment 2, “DCPP Units 1 and 2 Implementation Milestone Schedule”

Refer to Section 3 of this Enclosure.

5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

PG&E expects to comply with the order implementation date and no relief/relaxation is required at this time.

6. Open Items from Overall Integrated Plan

The following provides a summary and status of the open items documented in Reference 1. Open items identified as completed in References 3 and 4 require no further update.

OI-1:

Required staffing levels will be verified by walkthroughs, tabletops, and simulations of the identified FLEX strategies as a part of the Phase 2 staffing studies conducted in accordance with NEI 12-01.

Status: This item is complete. The Phase 2 staffing study was completed and submitted to the NRC in PG&E Letter DCL-15-063, “Response to March 12, 2012, NRC 10 CFR 50.54(f) Request for Information Regarding Recommendation 9.3, Phase 2 Staffing Assessment,” dated May 27, 2015.

OI-6:

PG&E will develop procedures to read this instrumentation locally, where applicable, using a portable instrument as required by NEI 12-06, Section 5.3.3.

Status: Procedures are currently scheduled to be issued by October 30, 2015, for Unit 1 and May 31, 2016, for Unit 2.

7. NRC FLEX Audit RAI Updates

PG&E provided its response to NRC FLEX Audit requests for additional information (RAIs) in November 2013. In its response, PG&E committed to provide an update of specific items in the six-month status reports prepared pursuant to NRC Order EA-12-049. RAIs identified as completed in Reference 11 require no further update.

The following provides a summary of the NRC FLEX RAI status updates:

049-RAI-DCPP-010:

PG&E will provide parking locations of the trucks required to support the movement of the FLEX equipment within the required timeframes.

Status: This item is complete. PG&E will be parking the trucks required to support the movement of the FLEX equipment within the required timeframes at the Primary BDB Storage Facility and the Secondary BDB Storage Facility.

8. Interim Staff Evaluation Open and Confirmatory Item Updates

The following provides PG&E's response to the NRC Interim Staff Evaluation open item and confirmatory items. Open item and confirmatory items identified as completed in Reference 11 require no further update:

Confirmatory Item 3.1.1.4.A (049-RAI-DCPP-006):

Off-Site Resources – Confirm RRC local staging area, evaluation of access routes, and method of transportation to the site.

Response: PG&E will confirm National SAFER Response Center (NSRC), formerly Regional Response Center (RRC), local staging area, evaluation of access routes, and method of transportation to the site in the final compliance letter.

Confirmatory Item 3.2.1.B:

RCS cooling and heat removal, and RCS inventory control – The licensee provided information regarding the analysis from WCAP-17601 applicable to DCPD in response to NRC staff requests. The NRC staff is continuing to review this information to ensure the licensee sufficiently justifies the analysis being applied. Additional information may be needed to confirm appropriate use of the analysis.

Response: PG&E notes that the NRC Staff is continuing to review information regarding the analysis from WCAP-17601 applicable to DCPD in response to

NRC Staff requests. PG&E will provide additional information, if required, in the final compliance letter.

Confirmatory Item 3.2.1.4.A:

The licensee used the Modular Accident Analysis Program (MAAP) code in performing its ELAP analyses. Aspects of the MAAP code analyses, such as boundary conditions, nodalization, and the selection of code options for modeling key physical phenomena, were not discussed in the Integrated Plan. Provide an understanding of the above issues to assess the technical adequacy of the code and determining the code's range of applicability.

Response: PG&E will provide information on the MAAP code used in performing the Extended Loss of Alternating Current Power (ELAP) analysis to show the technical adequacy of the code and the code's range of applicability in the final compliance letter.

Confirmatory Item 3.2.1.6.A:

On pages 70 through 73 in the Integrated Plan, the licensee listed elapsed times and time constraints in different columns in Attachment 1A (sequence of events timeline). The review determined that the times listed in the elapsed time column and the time constraint column often are the same and provide no margin between the elapsed time and the time constraint time. Provide clarification on how early a step must be begun to meet the time constraint, when the licensee actually expects to begin performing the step, information on what margin exists for these critical actions, and whether the time can be reasonably met.

Response: PG&E will provide clarification on how early a step must be begun to meet the time constraint, when it is expected to begin performing the step, information on what margin exists for these critical actions, and whether the time can be reasonably met in the final compliance letter.

Confirmatory Item 3.2.4.4.A:

Communications – Confirm that upgrades to the site's communications systems have been completed.

Response: PG&E will confirm the completion of the upgrades to the site's communications systems in the final compliance letter.

Confirmatory Item 3.4.A:

NEI 12-06, Section 12.2 lists minimum capabilities for offsite resources for which each Licensee should establish the availability. Discuss implementation of Guidelines 2 through 10 in NEI 12-06, Section 12.2.

Response: PG&E will discuss the implementation of Guidelines 2 through 10 in NEI 12-06, Section 12.2, in the final compliance letter.

9. Planned Communications Equipment Status Updates

PG&E submitted its response to a RAI regarding the Recommendation 9.3 Communications Assessment in PG&E Letter DCL-12-110, "Pacific Gas and Electric Company's Response to Recommendation 9.3 Communications Requests 1 and 3 and the Evaluation of Existing Communications Systems Power Supplies," dated October 29, 2012 (Reference 5). In its response, PG&E committed to provide a status update of the planned communications equipment in the six-month status reports prepared pursuant to NRC Order EA-12-049, Section IV.C.2. The following provides a status update of the planned communication equipment.

Communications Item 1:

As discussed in Reference 5, PG&E committed to procure additional hand held satellite phones, batteries, and chargers that will be provided with portable generator back-up power by December 31, 2013.

In Reference 6, PG&E concluded that a total of 9 satellite phones, 27 satellite phone batteries, and 5 multi-unit satellite phone chargers are required to ensure that the control room (CR), technical support center (TSC), and emergency operations facility have a dedicated line to perform State and County notifications. In addition, PG&E concluded that 8 satellite phones, 18 satellite phone batteries, and 5 multi-unit satellite phone chargers need to be procured.

Status:

- (1) PG&E has procured an additional eight satellite phones and placed into service nine satellite phones. The procurement of the additional satellite phones was reported as complete in Reference 10.
- (2) PG&E has procured 18 satellite phone batteries. The procurement of the satellite phone batteries was reported as complete in Reference 10.
- (3) PG&E has procured five multi-unit satellite phone chargers. The procurement of the satellite phone chargers was reported as complete in Reference 10.

- (4) Refer to Communications Item 5 for a status of the portable diesel generators. Until the portable diesel generators are received and placed in service, the hand held satellite phone chargers will be provided with back-up power using the communications trailer diesel generator. A procedure for charging the satellite phones using the communications trailer was reported as completed in Reference 10.

Clarification: As discussed in Reference 6, the portable hand held satellite phones have a talk time of 3.1 hours and a recharge time of 4 hours.

However, the additional batteries procured for the portable hand held satellite phones have talk time of 6 hours. The recharge time for the portable hand held satellite phones is 6 hours.

Communications Item 2:

As discussed in Reference 5, PG&E committed to install a fixed satellite phone with an external antenna in the Sheriff Watch Commander's office by October 27, 2015. As discussed in Reference 6, back-up power for the Sheriff Watch Commander's fixed satellite phone will be provided by an existing diesel generator with a 1000-gallon tank that is capable of providing 120 hours of power.

Status: This item is complete. PG&E has installed a fixed satellite phone with an external antenna in the Sheriff Watch Commander's office.

Communications Item 3:

As discussed in Reference 6, PG&E committed to procure additional single- and dual-band radio batteries and chargers that will be provided with portable generator back-up power by October 27, 2015.

Based on a review of the radio specifications in Reference 6, PG&E concluded that a total of 160 dual-band radio batteries, 150 single-band radio batteries, 14 6-unit and 20 single-unit dual-band chargers, and 13 6-unit and 20 single-unit single-band chargers are required to maintain communications within a 24-hour period. Reference 5 also stated that 80 dual-band radio batteries and 75 single-band radio batteries need to be procured.

Status:

- (1) This item is complete. PG&E has received an additional 75 single- and 80 dual-band radio batteries.

- (2) PG&E has 14 6-unit and 20 single-unit dual-band chargers, and 13 6-unit and 20 single-unit single-band chargers. This item was reported as complete in Reference 10.
- (3) Refer to Communications Item 5 for a status of the portable diesel generators.

Communications Item 4:

As discussed in Reference 11, a radio console will not be installed in the operational support center. PG&E will store radios, batteries, and chargers in a FLEX storage facility to support continued radio communications. This equipment will be stored in a FLEX storage facility by October 27, 2015.

Status: The radios, batteries, and chargers will be relocated to a FLEX storage facility as part of Phase 2, which is scheduled for October 27, 2015. Refer to Communications Item 3 for a status of the procurement of the additional radios, batteries, and chargers.

Communications Item 5:

As discussed in Reference 5, PG&E committed to procure portable generators and equipment to ensure that adequate power will exist to support extended operations. This equipment will be placed in service with approved procedures as part of Phase 2, which is scheduled for October 27, 2015.

Status: The portable generator enhancements are on schedule.

Communications Item 6:

As discussed in Reference 5, PG&E committed to relocate the SmartMsg and Zetron pager systems from their current location to an existing structure that is seismically robust. This will be completed by October 27, 2015.

As discussed in Reference 6, the paging system battery will be battery backed, with capability to be provided from a portable diesel generator, to ensure that adequate power will exist to support extended operations beyond 24 hours. Refer to Communications Item 5 for a status of the portable generators.

Status: The relocation of the SmartMsg and Zetron pager systems is on schedule.

Communications Item 7:

As discussed in Reference 6, PG&E committed to establish credited manual actions and their procedures in accordance with NEI 12-01 and NRC Order EA-12-049. Credited manual actions and procedures for the Phase 1 communications are scheduled to be completed by December 31, 2013. Credited manual actions and procedures for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Status: Credited manual actions and procedures for Phase 1 communication were reported as complete in Reference 10.

Completion of Phase 2 credited manual actions and their procedures are on schedule.

Communications Item 8:

As discussed in Reference 6, PG&E committed to establish maintenance procedures for the planned enhancements, including operability testing, in accordance with NEI 12-01 and NRC Order EA-12-049. Maintenance procedures for the Phase 1 communications are currently scheduled to be completed by December 31, 2013. Maintenance procedures for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Status: Temporary maintenance procedures for the Phase 1 communications were reported as complete in Reference 10. A permanent procedure for maintenance of the Phase 1 communications will be completed with Phase 2 procedures. Completion of Phase 2 maintenance procedures are on schedule.

Communications Item 9:

As discussed in Reference 6, PG&E committed to establish periodic inventory checks for the planned enhancements in accordance with NEI 12-01 and NRC Order EA-12-049. Periodic inventory checks for the Phase 1 communications are currently scheduled to be completed by December 31, 2013. Periodic inventory checks for the Phase 2 communications are currently scheduled to be completed by October 27, 2015.

Status: A temporary procedure for inventory checks of the Phase 1 communications equipment was reported as completed in Reference 10. A permanent procedure for inventory checks of the Phase 1 communications equipment will be completed with Phase 2 procedures. Completion of Phase 2 inventory procedures is on schedule.

Communications Item 10:

As discussed in Reference 6, PG&E committed to develop training plans for response personnel in plant groups such as the emergency response organization, fire, security, emergency planning, operations, engineering, and maintenance. The training plans will be developed in accordance with DCPD procedures using the systematic approach to training and will be implemented to ensure that the required DCPD staff is trained in accordance with NEI 12-01 and NRC Order EA-12-049. Training for applicable plant staff on the Phase 1 communications equipment was scheduled to be completed by December 31, 2013. Training for plant staff on the Phase 2 communications equipment is currently scheduled to be completed by October 27, 2015.

Status: Training plans and training for applicable plant staff on the Phase 1 communications equipment were reported complete in Reference 10. Phase 2 plant staff training is on schedule.

Communications Item 11:

As discussed in Reference 5, PG&E committed to relocate onsite Field Monitoring Team (FMT) satellite phones to the onsite FMT vehicle. Currently, the onsite FMT satellite phones are not stored in a structure that is considered to be seismically robust in accordance with NEI 12-01. This commitment will be implemented as part of Phase 2, which is scheduled for October 27, 2015.

Status: PG&E will relocate the onsite FMT satellite phones to an onsite FLEX storage facility. The FLEX storage facility will be seismically robust in accordance with NEI 12-01 and NEI 12-06. The FMT satellite phone relocation is on schedule.

Communications Item 12:

As discussed in Reference 6, PG&E committed to provide power from an uninterrupted power supply with 6 hours of back-up power to the CR and TSC fixed satellite phones by October 27, 2015.

Status: PG&E will provide power from an uninterrupted power supply with 24 hours of back-up power to the CR and TSC fixed satellite phones to ensure that the CR and TSC fixed satellite phones will be functional for a 24-hour duration. The uninterrupted power supply improvements are on schedule.

10. Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

11. References

The following references support the updates to the OIP described in this enclosure:

- (1) PG&E Letter DCL-13-007, "Pacific Gas and Electric Company's Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013
- (2) NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
- (3) PG&E Letter DCL-15-026, "Pacific Gas and Electric Company's Fourth Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated February 23, 2015
- (4) PG&E Letter DCL-13-081, "Pacific Gas and Electric Company's First Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated August 22, 2013
- (5) PG&E Letter DCL-12-110, "Pacific Gas and Electric Company's Response to Recommendation 9.3 Communication Requests 1 and 3 and the Evaluation of Existing Communications Systems Power Supplies," dated October 29, 2012
- (6) PG&E Letter DCL-13-012, "30-Day Response to Request for Additional Information Regarding the Recommendation 9.3 Communications Assessment," dated February 21, 2013
- (7) PG&E Letter DCL-12-048, "60-Day Response to 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
- (8) NRC Interim Staff Guidance, "Diablo Canyon Power Plant, Unit Nos. 1 and 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC Nos. MF0958 and MF0959)," dated February 3, 2014

- (9) 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
- (10) PG&E Letter DCL-14-014, "Pacific Gas and Electric Company's Second Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 26, 2014
- (11) PG&E Letter DCL-14-076, "Pacific Gas and Electric Company's Third Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated August 21, 2014
- (12) PG&E Letter DCL-15-026, "Pacific Gas and Electric Company's Fourth Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated February 23, 2015