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PG&E Letter DCL-16-012

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

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2

Clarifications to Environmental Request for Additional Information Responses for the  
Review of the Diablo Canyon Power Plant, Units 1 and 2, License Renewal  
Application

Dear Commissioners and Staff:

By Pacific Gas and Electric Company (PG&E) Letter DCL-09-079, "License Renewal Application," dated November 23, 2009, PG&E submitted an application to the U.S. Nuclear Regulatory Commission (NRC) for the renewal of Facility Operating Licenses DPR-80 and DPR-82, for Diablo Canyon Power Plant (DCPP) Units 1 and 2, respectively. The application included the License Renewal Application (LRA) and LRA Appendix E, "Applicant's Environmental Report – Operating License Renewal Stage."

By PG&E Letter DCL-15-142, "Response to NRC Letter dated November 5, 2015, 'Request for Additional Information Related to the Environmental Review of the Diablo Canyon Power Plant, Units 1 and 2, License Renewal Application (CAC Nos. MF4019 and MF4020)'," dated December 4, 2015, PG&E addressed requested additional information (RAI) needed for the NRC staff to continue their review of the DCPP LRA.

In response to questions asked by the NRC staff, PG&E is submitting clarifications to the PG&E Letter DCL-15-142 RAI responses in the Enclosure.

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If you have any questions regarding this response, please contact Mr. Terence L. Grebel, License Renewal Project Manager, at (805) 458-0534.



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

Executed on January 26, 2016.

Sincerely,

L. Jearl Strickland, P.E.  
*Director, Technical Services*

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Enclosure

cc: Diablo Distribution  
cc/enc: Marc L. Dapas, NRC Region IV Administrator  
Siva P. Lingam, NRC Project Manager  
Richard A. Plasse, NRC Project Manager, License Renewal  
Binesh K. Tharakan, Acting NRC Senior Resident Inspector  
Michael J. Wentzel, NRC Project Manager, License Renewal  
(Environmental)

Enclosure  
PG&E Letter DCL-16-012

**Pacific Gas and Electric (PG&E) Clarifications to PG&E Letter DCL-15-142,  
“Response to NRC Letter dated November 5, 2015, ‘Request for Additional  
Information Related to the Environmental Review of the Diablo Canyon Power  
Plant, Units 1 and 2, License Renewal Application (CAC Nos. MF4019 and  
MF4020)’”**

RAI AIR-5(c) Follow-up

*Please clarify whether PG&E has a GHG emissions reduction program implemented specifically at DCP.*

PG&E Response to RAI AIR-5(c) Follow-up

PG&E does not have a greenhouse gas (GHG) emissions reduction program implemented specifically for Diablo Canyon Power Plant (DCPP). Via the utility sponsored green-fuels program and ongoing vehicle/equipment fleet modernization initiatives, the facility effectively participates in overall PG&E GHG emissions reduction efforts for aggregate operations.

RAI SWR-1 Follow-up

*PG&E provided its last five annual submissions to the CEC (i.e., form CEC-1304 Schedule 3 Part A-Annual Water Supply and Use and Wastewater Discharge Report). In lieu of completing the CEC prescribed forms, PG&E has elected to append the forms with a set of three spreadsheets as part of its annual submittals. While one spreadsheet ("DCPP Once-Through Cooling (OTC) System Flows") provides monthly and total yearly discharge (which appears to be limited to just condenser circulating water return flows), none of the spreadsheets appears to have a cumulative total for surface water (ocean) withdrawals. This is necessary in order to calculate the delta between intake and discharge. Please clarify how total surface water withdrawals can be determined using the spreadsheets that were provided.*

PG&E Response to RAI SWR-1 Follow-up

The volumes provided for "DCPP Once-Through Cooling (OTC) System Flows" in the CEC-1304 data are proxy National Pollutant Discharge Elimination System (NPDES) wastewater discharge volumes based on maximum estimated surface water withdrawal at the intake; which is calculated using main-circulating and auxiliary saltwater-circulating pump hours of operation. Therefore, there is no calculable delta between the OTC intake and OTC discharge from the data provided. The OTC discharge volumes are directly equivalent to surface water intake volumes.

RAI SWR-10 Follow-up

*This RAI response states that the desalination facility is licensed to produce 1.5 million gpd; however, Section 3.1.2 of the ER states that the desalination facility has the capacity to produce 450 gpm (648,000 gpd). Please clarify.*

PG&E Response to RAI SWR-10 Follow-up

The desalination facility is licensed via the NPDES permit to generate/discharge up to 1.44-million gallons per day of process wastewater. It is not licensed in a manner which sets a specified maximum on freshwater production volume; however, the wastewater generation/discharge limit effectively sets a limit dependent on process efficiency.

The current two-train operating system can only produce 450 gallons per minute (648,000 gallons per day), which results in actual process wastewater generation volumes that, at maximum production, are well below the NPDES wastewater discharge limit.

See revised RAI SWR-10 response below.

DCPP's desalination facility is licensed *via the NPDES permit* to ~~produce-generate and discharge~~ as much as 1.5-44 million gallons a day of ~~process wastewater (brine concentrate and filter backwash)~~~~non-potable water~~. *This authorization subsequently allows the facility, if outfitted to full capacity, to produce up to approximately the same amount of non-potable freshwater per day. As stated in ER Section 3.1.2, the desalination facility currently has an installed design capacity to produce 450 gallons per minute (648,000 gallons per day). However,* DCPP *currently* uses an average of 356,500 gallons per day to provide the majority of freshwater for plant primary and secondary systems makeup, fire protection system source water, and plant domestic potable water system supply.

On May 5, 2015, PG&E entered into a 5-year agreement with SLO County to use the DCPP desalination facility's excess capacity to provide the county's Office of Emergency Services with non-potable water to reduce the impact of using local water supplies to fight wildfires. The Office of Emergency Services will determine how to transport the water to needed areas.

On August 25, 2015, the SLO County Board of Supervisors unanimously approved two recommendations to conduct feasibility studies evaluating the potential use of excess non-potable water from the DCPP desalination facility as a new water source for surrounding communities.

The first recommendation directed staff to engage potential stakeholders in the Santa Maria and Los Osos groundwater basins regarding drought relief opportunities presented by the DCPP desalination facility.

The second recommendation directed county staff to move forward on a parallel track to develop, in concert with PG&E, an emergency project to make desalinated water available to South County communities in the event of continued drought conditions.

The volume and rate to be supplied for public use is projected to be between 500 and 1000 acre-feet per year of non-potable water, and method of delivery is a new pipeline (currently being designed) from the DCPD SWRO facility to a county agency water main just outside the DCPD front gate. It is ~~envisaged-~~ *envisioned* that the county will provide the treatment facility to make the water potable *and PG&E will not expand its domestic water production capability for this potential effort.*