

PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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September 27, 1983

DOCKETED
USNRC

Chairman Nunzio J. Palladino
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, DC 20555

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Commissioner James K. Asselstine
Commissioner Frederick M. Bernthal
Commissioner Victor Gilinsky
Commissioner Thomas M. Roberts

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Chairman and Commissioners:

This letter is to respectfully request that the Commission restore at the earliest possible time Pacific Gas and Electric Company's low-power license for Diablo Canyon Power Plant in accordance with the three-step licensing process approved by the Commission on December 8, 1982. PGandE has complied fully with all requirements imposed by the Commission for loading fuel and proceeding with Step 1 of the three-step licensing process.

As you know, PGandE, in conjunction with Bechtel Power Corporation, has been engaged in a massive verification of the design of Diablo Canyon. This effort has involved the expenditure of over 1100 man years of intensive technical review. Additionally, the Independent Design Verification Program (IDVP) has expended over 125 man years in the performance of its verification activities.

Throughout this program, the Commission and the Staff have afforded intervenors the opportunity to file comments, participate in meetings and briefings, and otherwise become involved in the process. Furthermore, they have received copies of all significant documents generated by the verification program including Interim Technical Reports (ITR's), Final Reports and Staff SER's. In short, they have participated in and provided input to the verification process.

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On September 13, 1983, the Commission was briefed by the Staff and the IDVP on the status of the verification effort. During its presentation, the Staff recommended that the Commission restore the license subject to certain enumerated conditions. We concur with that recommendation. At this time, all of the IDVP analytical work has been completed. All that remains is for the IDVP to verify that the committed work has been completed and issue Revisions to the applicable ITR's documenting completion of this work. The last of the ITR's are scheduled to be issued on October 4, 1983.

We do not believe that an additional comment period by the parties is warranted as a condition for reinstatement of our license and for completion of Step 1 of the three-step licensing process. In approving the three-step licensing process, the Commission clearly indicated that fuel loading and cold system-testing could occur before all activities of the verification program were completed.

Accordingly, we request that the Commission restore, in accordance with the Staff recommendation, our authority to load fuel and allow us to proceed with the test activities authorized in Step 1 of the three-step licensing process. We expect that the plant will be ready for fuel load on or before October 22, 1983. We will, of course, not proceed with fuel loading until we are satisfied that the plant is ready in all respects for fuel loading.

A timely decision in this matter would be greatly appreciated.

Sincerely,

/s/ G. A. Maneatis

G.A. Maneatis
Executive Vice President
Facilities & Electric
Resources Development

GAM:gdb

cc: Service List