

PG&E Letter DCL-2011-516

Certified/Return Receipt
7010-1060-0000-4204-3916



April 11, 2011

Philip Isorena
Chief, NPDES Unit
Division of Water Quality
State Water Resources Control Board (SWRCB)
1001 I Street, 15th Floor
Sacramento, CA 95814

Application/Report of Waste Discharge - Diablo Canyon Power Plant

Dear Mr. Isorena:

In response to the SWRCB request to submit a new application/report of waste discharge for the Diablo Canyon Power Plant (DCPP), and the last five years of monitoring information prescribed by the current plant discharge permit, the following are provided:

- 1) The overview summary, tabular data, and graphical data sections of the DCPP Annual Discharge Self Monitoring Reports (DSMRs) for years 2006-2010 (Enclosure-1). The DSMRs were previously submitted to the Central Coast Regional Water Quality Control Board (CCRWQCB), as well as the State CIWQS Web Application Database for the 2010 Reporting Year. The monitoring report sections are also provided in word searchable Acrobat-PDF electronic file format on Compact Disk.
- 2) Application/Report of Waste Discharge (RWD) and Supporting Information (Enclosure-2). The application is also provided in word searchable Acrobat-PDF electronic file format on Compact Disk.
 - California State Form 200 Application/Report of Waste Discharge General Information
 - U.S. Environmental Protection Agency Form 1 General Information
 - U.S. Environmental Protection Agency Form 2C NPDES Application for Permit to Discharge Wastewater - Existing Manufacturing, Commercial, Mining, and Silviculture Operations.

EPA Forms 1 and 2C provide updates to the information contained in the original National Pollution Discharge Elimination Systems (NPDES) permit renewal application submitted to the CCRWQCB in November of 1994 (PG&E Letter DCL-94-245), and the subsequent NPDES permit application amendment package submitted to the CCRWQCB in January of 2001 (PG&E Letter DCL-2001-501).

The application package includes analytical results of power plant intake and discharge re-sampling conducted in November of 2005 and December of 2010. The 2005 sampling was conducted outside the standard three year time frame for filing application related analytical results. However, the sampling results and associated waste water quality characterizations obtained remain representative of current plant operations and discharge parameters which have not changed in the interim period.



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Multiple discharges identified in EPA Form 2C are not amenable to sampling and analysis in accordance with the application instructions. The discharges, identified in Form 2C as 005 thru 009, were incorporated in the 2003 Draft NPDES Permit for Diablo Canyon Power Plant developed by the CCRWQCB. The batch and intermittent type outfall locations primarily involve infrequently used or only potential non plant process waste water discharges. These include discharges such as intake circulating water pump backflows which immediately mix with the power plant seawater intake cove, and reverse osmosis system raw seawater supply line drain points. Analytical results provided for the power plant intake are substantially equivalent to the water quality characterization expected for these outfall locations with exception of 006 which would be equivalent to plant pathway 001P if used.

In October of 2006 Diablo Canyon implemented a storm water management program in accordance with the State General Industrial Permit. As such, the updated application package does not incorporate site storm water related information.

Additionally, the application does not address issues related to plant thermal discharge and 316(b) assessments or findings. These issues have been subject of extensive prior communications and coordination between PG&E and the CCRWQCB, and will be managed separately.

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions or concerns regarding the application provided, or require additional information, please contact Bryan Cunningham of my staff at (805) 545-4439.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James M. Welsch'.

James M. Welsch
Station Director – Diablo Canyon Power Plant

Enclosures (2)

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cc: w/enclosures

Acrobat-PDF Electronic Formatted Files:

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Michael S. Peck
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Diablo Canyon Power Plant 104/5