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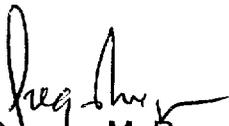
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Commitment Change Summary Report

Dear Commissioners and Staff:

In accordance with the Nuclear Energy Institute's (NEI) "Guideline for Managing NRC Commitments," Revision 2, endorsed by the NRC in SECY-95-300, PG&E hereby submits the enclosed Commitment Change Summary Report for Diablo Canyon Power Plant, Units 1 and 2. The report provides a summary of the regulatory commitment changes that occurred during the period June 17, 1999, through December 31, 1999. The summary for each change includes identification of the source document(s), and a description of the commitment change.

The regulatory commitment changes described in the report were processed in accordance with the NEI guideline and were determined to not require prior NRC approval. The report does not include commitment changes that are contained in 10 CFR 50.59 (b) (2) safety evaluation summary reports, or in other submittals previously transmitted to the NRC.

Sincerely,



Gregory M. Rueger

cc: Steven D. Bloom
Ellis W. Merschoff
David L. Proulx
Diablo Distribution

Enclosure

KAO/1392/A0463582

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**COMMITMENT CHANGE SUMMARY REPORT
JUNE 17, 1999 THROUGH DECEMBER 31, 1999**

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1. Overtime Restrictions

- Source Document(s): PG&E Letter DCL-98-071, "Commitment Change Summary Report," dated June 16, 1998
- PG&E Letter DCL-96-062, "Technical Specification 6.2.2f., Overtime Restrictions Not Met Due to Inadequate Overtime Control Program," dated February 27, 1996
- PG&E Letter DCL-96-61, "Reply to Notice of Violation in NRC Enforcement Action 95-279 NRC Inspection Report Nos. 50-275/95-17 and 50-323/95-17," dated February 23, 1996
- PG&E Letter DCL-93-070, "Licensee Event Report 1-92-021-01, Technical Specification 6.2.2 Overtime Restriction Violations Due to Inadequate Overtime Control Program," dated March 26, 1993
- PG&E Letter DCL-92-277, "Licensee Event Report 1-92-021-00, Technical Specification 6.2.2 Overtime Restriction Violations," dated December 17, 1992

Description of Commitment Change

This change allows an extension of the authority currently delegated to the Managers to approve extended work periods from 13 days to 20 days during plant shutdowns. This does not violate the intent of the revised commitment in DCL-98-071 as it maintains the current management level of oversight - that is it does not allow the consecutive work days to be authorized by lower levels of management. Extending work periods during outages beyond 6 days reduces the need for multiple hand-offs on critical projects, thus reducing the likelihood of personnel errors. Extending the managers delegated authority to approve up to 20 days in a row versus the previous 13 day limit should not increase the number of requests or approvals for working up to 20 days. With shorter overall outage durations, most work can be completed within one or two extended work periods, which significantly reduces the need for multiple or continuous work week extensions and the resulting cumulative fatigue that would result.

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It is expected that the number of requests for working beyond 20 days will actually be less than previous outages by reducing the volume of requests going to the vice-president thus allowing more rigorous scrutiny of each request.

The criteria for approving extended work periods for an individual is not being changed. The worker will still be evaluated to assure that they are physically capable and mentally alert to perform their work in a safe and efficient manner. Because of the increased responsibility for supervisors to evaluate worker fitness, as well as their important role in work assignment and processing clearances, the vice-president will continue to approve any requests for supervisors to work beyond 13 days.

This change does not alter or conflict with Diablo Canyon Power Plant (DCPP) Technical Specification limits on overtime and how they are treated.

2. Timely Actions for FSAR Update

Source Document(s): PG&E Letter DCL-90-018, "Licensee Event Report 1-89-014-01, Potential Degradation of the Containment Recirculation Sump Due to Inadequate Procedures and Personnel Error," dated January 19, 1990

Description of Commitment Change

DCPP no longer performs and submits annual Final Safety Analysis Report (FSAR) updates. Per the requirements of 10 CFR 50.71(e), "the FSAR is to be updated periodically and filed with the NRC." In addition, Section (e)(4) of this regulation states, "Subsequent revisions must be filed annually or 6 months after each refueling outage provided the interval between successive updates does not exceed 24 months." PG&E meets this requirement by scheduling FSAR Updates within 6 months following completion of each Unit 2 refueling outage with the interval revisions not to exceed 24 months. As a result, the change in the wording complies with regulations and reflects how DCPP performs these updates. Everything else in the commitment remains the same.

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3. Work Planning Center Implementing Procedures

Source Document(s): PG&E Letter DCL-87-136, "PGandE Management Actions to Maintain the High Level of Performance at DCPD," dated June 15, 1987

Description of Commitment Change

In recent DCPD reorganizations, the Work Planning Center was disbanded and the responsibility for performing maintenance planning and scheduling functions was decentralized.

The original commitment referring to the Work Planning Center has been deleted and the responsibilities are described within the following plant procedures:

- AD7.ID4, "Online Maintenance," for scheduling non-routine maintenance.
- MA1.DC51, "Preventative Maintenance Program," for planning and scheduling preventive maintenance.
- AD13.DC1, "Control of the Surveillance Testing Program," for planning and scheduling routine plant testing.
- AD7.DC8, "Work Control" for planning, scheduling, and performing routine and non-routine maintenance.