

September 22, 2000

Mr. Gregory M. Rueger
Senior Vice President, Generation and
Chief Nuclear Officer
Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant
P. O. Box 3
Avila Beach, CA 94177

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) - REVISION TO
COMMITMENT REGARDING NUREG-0737 AND REGULATORY GUIDE 1.97,
REVISION 3, ON GUIDANCE FOR SOLUBLE BORON CONCENTRATION
MONITORING - DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2
(TAC NOS. MA7708 AMD MA7709)

Dear Mr. Rueger:

In a letter dated November 12, 1999, Pacific Gas and Electric Company requested NRC approval to revise its commitment regarding guidance provided by NUREG-0737, "Clarification of TMI Action Plan Requirements," and Regulatory Guide 1.97, Revision 3, "Instrumentation for Light-Water Coded Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," for soluble boron concentration monitoring. The NRC staff has identified the need for additional information in order to complete the staff's review. The enclosed RAI describes the specific information requested by the NRC.

The enclosed request was discussed with Mr. James Radford of your staff on September 15, 2000. A mutually agreeable target date of October 1, 2000, for your response was established. If circumstances result in the need to revise the target date, please call me at the earliest opportunity. If you have any questions regarding this matter, please contact me at (301) 415-1313.

Sincerely,

/RA/

Steven D. Bloom, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-275
and 50-323

Enclosure: Request for Additional Information

cc w/encls: See next page

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Diablo Canyon Power Plant, Units 1 and 2

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REQUEST FOR ADDITIONAL INFORMATION
SOLUBLE BORON CONCENTRATION MONITORING
PACIFIC GAS AND ELECTRIC COMPANY
DIABLO CANYON UNITS 1 AND 2
DOCKET NOS. 50-275 AND 50-323

1. Page 7.7-19 of your submittal states the following:

The boron concentration measurement system provides continuous monitoring of the reactor coolant boron concentration. Therefore, adjustments of boron concentration in the reactor coolant can be monitored as they are being made. Further, the plant operators can monitor boron concentration directly. There is no time lapse or personnel requirement for collection and laboratory analysis of reactor coolant samples, nor is there any waste material to be processed.

This paragraph alludes to the use of the boron concentration monitoring system (BCMS) in place of "grab samples." How was this information used? How will this function be met upon elimination of BCMS?

2. If the post accident sampling system (PASS) has been capable of meeting the requirements of NUREG-0737 and Regulatory Guide 1.97, Revision 3, why were both systems credited initially?
3. Elimination of the use of BCMS for monitoring boron concentration in the reactor coolant system (RCS) and reliance for this function on PASS will require the continued maintenance of PASS. Based on the response to Question 1, will PASS be relied on for all functions previously performed by BCMS?
4. By what means is the RCS boron concentration currently measured to ensure adequate shutdown margin?