



**Pacific Gas and
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PG&E Letter DCL-01-053

**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
License Amendment Request 01-01,
Post Accident Sampling System Elimination**

Dear Commissioners and Staff:

Enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 pursuant to 10 CFR 50.90. This proposed License Amendment Request (LAR) would delete Technical Specification (TS) 5.5.3, "Post Accident Sampling System," from the TS for Diablo Canyon Power Plant (DCPP) Units 1 & 2 and license condition 2.C.(6).e, "Post Accident Sampling," from DCPP Unit 1 Facility Operating License No. DPR-80. These changes are consistent with the NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of the Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement as part of the Consolidated Line Item Improvement Process (CLIP) was announced in the Federal Register on October 31, 2000 (65 FR 65018).

Enclosure 1 provides a description of the proposed changes, the required confirmation of applicability, and plant specific verifications and commitments. Enclosures 2 and 3 provide the marked-up and revised TS page, respectively. Enclosure 4 provides the marked-up Unit 1 Operating License page. The Unit 2 Operating License does not contain requirements for PASS. Enclosure 5 provides the marked-up TS Bases page for information. The Bases changes will be implemented under PG&E's TS 5.5.14 TS Bases Control Program after NRC approval of this LAR.

PG&E letter DCL-99-148, dated November 12, 1999, supplemented by PG&E letter DCL-00-131, dated October 18, 2000, submitted a relief request to eliminate the boron concentration monitoring system (BCMS) for use in meeting the guidance of NUREG-0737 and Regulatory Guide (RG) 1.97, Revision 3, for monitoring reactor coolant boron concentration following an accident. PG&E

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requested approval to use PASS for post accident monitoring of reactor coolant boron concentration, allowing the BCMS to be abandoned. The PG&E relief request was approved by NRC Letter dated December 4, 2000 which stated: "The staff has evaluated PG&E's request and concluded that eliminating the BCMS and using only PASS is acceptable in meeting the guidance provided in RG 1.97, Revision 3."

Meanwhile, the availability of TSTF-366 for use with the CLIP process was announced in the Federal Register on October 31, 2000 (65 FR 65018). The Federal Register announcement includes a model safety evaluation (SE) that concludes that 15 PASS sampling requirements may be eliminated, including the requirement to sample reactor coolant boron following an accident. PG&E has reviewed the model SE and concludes that the model SE applies to DCPD Units 1 and 2. Accordingly PG&E believes a requirement to utilize PASS in place of the BCMS to sample reactor coolant boron following an accident is no longer necessary.

The changes proposed in this LAR are not required to address an immediate safety concern. However, the approval of this LAR will allow PG&E to better utilize existing resources. Therefore, PG&E requests that the review and approval of this LAR be completed by December 31, 2001, and that the LAR be made effective upon issuance, to be implemented within 90 days from the date of issuance.

Sincerely,

David H. Oatley
Vice President, Diablo Canyon Operations

cc: Edgar Bailey, DHS
Ellis W. Merschoff
David L. Proulx
Girija S. Shukla
Diablo Distribution

Enclosures

1. Description and Assessment
2. Proposed Technical Specification Change
3. Revised Technical Specification Change
4. Proposed Unit 1 Facility Operating License Change
5. Proposed Technical Specification Bases Changes

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

This proposed License Amendment Request (LAR) would delete Technical Specification (TS) 5.5.3, "Post Accident Sampling System," from the TS for Diablo Canyon Power Plant (DCPP) Units 1 & 2 and license condition 2.C.(6).e, "Post Accident Sampling," from DCPP Unit 1 Facility Operating License No. DPR-80.

2.0 DESCRIPTION

This LAR proposes to delete TS 5.5.3, "Post Accident Sampling System," from DCPP Units 1 & 2 TS and license condition 2.C.(6).e, "Post Accident Sampling," from DCPP Unit 1 Facility Operating License No. DPR-80. DCPP Unit 2 Facility Operating License No. DPR-82 does not contain requirements for the Post Accident Sampling System (PASS).

The changes are consistent with the NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of the Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement as part of the Consolidated Line Item Improvement Process (CLIP) was announced in the Federal Register on October 31, 2000 (65 FR 65018).

3.0 BACKGROUND

Westinghouse Owners Group topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considers the progression and consequences of core damage accidents and assesses the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concludes that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

4.0 TECHNICAL ANALYSIS

4.1 Applicability of Published Safety Evaluation

PG&E has reviewed the model safety evaluation published in the Federal Register on October 31, 2000 (65 FR 65018) for confirmation of applicability to DCPD Units 1 & 2. This included a review of the NRC staff's evaluation as well as the information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev. 2, as approved by NRC letter dated June 14, 2000). PG&E has concluded that the justifications presented in the TSTF and the safety evaluation prepared by the NRC staff are applicable to DCPD Units 1 & 2 and justify the proposed changes to the DCPD Units 1 & 2 TS and to the DCPD Unit 1 Facility Operating License No. DPR-80.

PG&E is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000 (65 FR 65018).

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

PG&E has reviewed the proposed no significant hazards consideration determination published on October 31, 2000 (65 FR 65018), as part of the CLIIP. PG&E has concluded that the proposed determination presented in the notice is applicable to DCPD Unit 1 and Unit 2, and the determination is hereby incorporated, by reference to satisfy the requirements of 10 CFR 50.91(a).

5.2 Verification and Commitments

As discussed in the notice of availability (65 FR 65018) for this TS improvement, PG&E provides the following plant-specific verifications and commitments.

1. PG&E will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump fluid, and containment atmosphere. The contingency plans will be contained in plant procedures and established within 90 days of issuance of the license amendment.
2. The capability for classifying fuel damage events at the Alert level threshold will be established at radioactivity levels of 300 $\mu\text{Ci/cc}$ dose equivalent iodine. This capability will be described in plant

procedures and established within 90 days of issuance of the license amendment.

3. PG&E has established the capability to monitor radioactive iodines that have been released to the offsite environment. This capability is described in PG&E's emergency plan implementing procedures.

6.0 ENVIRONMENTAL EVALUATION

PG&E has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 (65 FR 65018), as part of the CLIP. PG&E has determined that the staff's findings presented in that evaluation are applicable to DCCP Unit 1 and Unit 2 and the evaluation is hereby incorporated by reference for this application.

PROPOSED TECHNICAL SPECIFICATION CHANGE

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Page 5.0-7

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Page 5.0-7

5.5 Programs and Manuals (continued)

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include portions of Recirculation Spray, Safety Injection, Chemical and Volume Control, Residual Heat Removal, RCS Sample, and Liquid and Gaseous Radwaste Treatment Systems. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

Not used

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001-20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;

(continued)

REVISED TECHNICAL SPECIFICATION PAGE

5.5 Programs and Manuals (continued)

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include portions of Recirculation Spray, Safety Injection, Chemical and Volume Control, Residual Heat Removal, RCS Sample, and Liquid and Gaseous Radwaste Treatment Systems. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Not Used

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001-20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;

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PROPOSED UNIT 1 FACILITY OPERATING LICENSE CHANGE

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water reactors or shall have participated in the startup of at least three pressurized water reactors. At least one such experienced individual shall be on duty on each shift through the startup test program whenever the reactor is not in a cold shutdown condition for at least the first year of operation or until the plant has attained a nominal 100% power level, whichever occurs first.

d. Procedures for Verifying Correct Performance of Operating Activities (Section I.C.6)

Procedures shall be available to verify the adequacy of the operating activities.

e. Post Accident Sampling (Section II.B.3)

Deleted

~~PG&E shall provide the capability to promptly obtain and perform radioisotopic and chemical analyses of reactor coolant and containment atmosphere samples under degraded core conditions without excessive exposure.~~

f. Relief and Safety Valve Test Requirements (Section II.D.1)

PG&E shall implement the results of the EPRI test program.

g. Containment Isolation Dependability (Section II.E.4.2)

PG&E shall limit the 12-inch vacuum/overpressure relief valve opening to less than or equal to 50 degrees.

h. Calculations for Small-Break LOCAs (Sections II.K.3.30 and II.K.3.31)

PG&E is participating in the Westinghouse Owners Group effort for this item and shall conform to the results of this effort. Within one year of staff approval of the Westinghouse generic methodology for calculating small break LOCAs (II.K.3.30), PG&E shall submit a plant specific calculation (II.K.3.31) for staff review and approval.

i. Long-Term Emergency Preparedness (Section III.A.2)

(1) PG&E shall submit a detailed control room design review summary report by December 31, 1984.

(2) PG&E shall complete operator training on the Safety Parameter Display System and emergency operating procedures by March 28, 1985.

PROPOSED TECHNICAL SPECIFICATION BASES CHANGES

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BASES

ACTIONS
(continued)

C.1

Condition C applies when one or more Functions have two or more inoperable required channels (i.e., two or more channels inoperable in the same function). Required Action C.1 requires restoring all but one channel in the Function(s) to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with no required channels OPERABLE in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of all but one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur. Condition C is modified by a Note that excludes hydrogen monitor channels.

D.1

Condition D applies when two hydrogen monitor channels are inoperable. Required Action D.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable based on the backup capability of the ~~Post Accident Sampling System to monitor the hydrogen concentration for evaluation of core damage and to provide information for operator decisions. Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.~~ *event*

E.1

Condition E applies when the Required Action and associated Completion Time of Condition C or D are not met. Required Action E.1 requires entering the appropriate Condition referenced in Table 3.3.3-1 for the channel immediately. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met any Required Action of Condition C or D, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

F.1 and F.2

If the Required Action and associated Completion Time of Conditions C or D are not met and Table 3.3.3-1 directs entry into Condition F, the unit must be brought to a MODE where the requirements of this LCO do not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and MODE 4 within 12 hours.

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