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PG&E Letter DCL-01-074

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
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 January 1, 2000, through December 31, 2000. The summary for each change includes identification of the source document(s), a description of the original and revised commitments, and a justification for the 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.

Sincerely,

David H. Oatley

cc: Ellis W. Merschoff
David L. Proulx
Girija S. Shukla
Diablo Distribution

Enclosure

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**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2000, THROUGH DECEMBER 31, 2000**

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1. Revision to Various ASW Pump Surveillance Test Procedures

Source Document(s): PG&E Letter DCL 88-215 dated 9/13/88

Original Commitment (T31387)

Item 5: "The latest revision to emergency procedure (EP) E-0, "Reactor Trip or Safety Injection," directs operators to verify engineered safety feature (ESF) pump and valve status and references the operators to the appropriate abnormal operating procedures (AP) for both the component cooling water system (CCWS) and auxiliary saltwater system (ASWS)."

Revised Commitment

The latest revision to Emergency Operating Procedure (EOP) E-0, "Reactor Trip or Safety Injection," directs operators to verify ESF pump and valve status.

Justification for Change

EOP E-0 contains a list of 7 referenced procedures for addressing ESF malfunctions. PG&E wants to remove this list from EOP E-0 in order to remove unnecessary detail from this high level procedure. This is justifiable because (1) the abnormal procedures used to address specific system malfunctions are well known to operators; (2) there are adequate annunciators, annunciator response procedures, and vertical board indicators to guide operators to the appropriate corrective action to restore ESF functions; and (3) simulator experience indicates that this list is not used by procedure readers.

The important point of the response is that procedural guidance exists to remove heat loads from the CCW system should CCW system capacity be exceeded. This corrective action would be initiated by receipt of a CCW high temperature alarm and direction in the annunciator response procedure to OP AP-11, "Malfunction of the Component Cooling Water System," which would direct the actions to reduce system heat loads. These actions would be taken whether or not a loss-of-coolant accident (LOCA) were in progress.

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2. Address Loss of Decay Heat Removal-Loss of RHR Event

Source Document(s): PG&E Letter DCL 89-030 dated 2/6/89

Original Commitment (T32818)

Item 14 of commitment #T32818 states, "The coordinator is responsible to be fully aware of personnel in containment and work in process and communicating this information to the operating shift." The coordinator being referenced is inferred to be the Containment Radiation Protection Coordinator from the statement in item 13 of the same commitment.

Revised Commitment

Operations Services shall assign a coordinator who is responsible to be fully aware of personnel in containment and work in process and communicating this information to the operating shift.

Justification for Change

The Containment Radiation Protection Coordinator is really only concerned with ongoing jobs from a radiological perspective, and not necessarily from an operational perspective. The wording change will allow Operations Services to assign this duty to the personnel with whom it makes the most sense based on current operating practices and management direction. This duty could be assigned to the Mid Loop Coordinators, who now do the job in parallel to radiation protection (RP), or in the future, it could be assigned to the Clearance Coordinators, Work Authorization Foremen, or other such assigned personnel.

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3. Maintenance of Emergency Equipment Steam Generator Manways and Nozzle Dam

Source Document(s): PG&E Letter DCL 89-030 dated 2/6/89
PG&E Letter DCL 91-011 dated 1/17/91

Original Commitment (T32830)

Operating Procedure OP A-2:III (Ref. 8) stipulates as a prerequisite to draining to mid-loop, (1) that one charging pump be available for cold leg injection, (2) that gravity makeup from the RWST be available, (3) that a medium head safety injection (SI) pump be available for hot leg injection and that, (4) at least two steam generators be filled with water to the 15 percent narrow range level.

If the RCS is configured with large cold leg opening and not hot leg vent paths, a rapid core uncover can occur after RHR is lost. The WOG has quantified the rate of core uncover. This information has been incorporated into current procedures so the order of steam generator manway and nozzle dam installation and removal is strictly controlled to preclude an adverse RCS configuration.

Revised Commitment

Request wording of commitment be changed to state, "... (3) Whenever the RCS man ways are intact, at least two steam generators be filled with water to the 15 percent Narrow Range Level."

Justification for Change

When the RCS manways are not intact, the steam generators cannot be used as a back up heat sink, as it is not possible for the RCS to communicate with the steam generator unless there is no large RCS vent path. This is clearly spelled out in Abnormal Operating Procedure (OP) AP SD-0 "Loss of, or Inadequate Decay Heat Removal" Appendix D "Decay Heat Removal Using Steam Generators." PG&E wants to revise its procedure OP A-2:III to include information concerning when steam generators are required to be greater than 15% NR.

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4. Engineer Identified Constraints

Source Document(s): PG&E Letter DCL 89-078 dated 3/24/89

Original Commitment (T32716)

PG&E Engineering identified constraints on operating practices will be communicated to the plant via the design change process.

Revised Commitment

New or revised design constraints on operating and maintenance practices will be issued as a design change if they result in a change to any design output document; otherwise, it will be communicated by ARs or Action Evaluations (AEs).

Justification for Change

A design change is normally issued when there is a change to a design output document; otherwise, an AR is an acceptable way of communicating and tracking.

5. Revise OP O-28

Source Document(s): PG&E Letter DCL 99-156 dated 11/29/99

Original Commitment (T36011)

LER 1-1999-009 Corrective Action #1 stated: "PG&E will enhance OP O-28, 'Operating Order O-28: Intake Management,' to include the lessons learned from this event regarding heavy weather coping strategy. The guidance will include a Plant Staff Review Committee (PSRC) review of Category 2 storm warning conditions."

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Revised Commitment

Senior Management, including the Station Director (or designee) will meet and review operating strategies in the event of a high swell warning.

Justification for Change

LER 1-1999-009, which addressed the October 28, 1999, dual unit trip, included the revised commitment described above. However, it did not clearly state that the intent of the change was to supercede the original commitment of a PSRC review with a designated operations management team review. The purpose of the change was to facilitate prompt management review of changing storm and plant condition. The change preserves the intent of having management assist operators in the assessment of plant readiness and strategy development.

6. Precautions to Maintenance Testing on ABVS Dampers

Source Document(s): PG&E Letter DCL 93-017 dated 1/18/93,
LER 1-92-011-00

Original Commitment (T35059)

A 15-minute wait period is required for auxiliary building ventilation system fan (supply and exhaust) restarts.

Revised Commitment

A 5-minute wait period is required for auxiliary building ventilation system fan (supply and exhaust) restarts.

Justification for Change

The thermal overload (TOL) relays and heaters had been upgraded to have added margin to reduce the likelihood of a nuisance trip on fan restarts. The 5-minute wait period is added insurance that the TOL trip on fan restarts are very unlikely to happen.

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7. Radiation Surveys of Items Removed from Fuel Pool

Source Document(s): PG&E Letter DCL 88-009 dated 1/19/88,
LER 1-87-027-00

Original Commitment (T31027)

The SWP and the diver coverage procedure, Radiation Control Procedure, RCP D-215 were revised to require radiation surveys of all items removed from the fuel pool.

Revised Commitment

Radiation Control Procedure, RCP D-215 has been revised to require radiation monitoring of all items removed from the fuel pool.

Justification for Change

Changed criteria of "surveying" material as it is removed from the water to "monitoring" material as it is removed. The term "surveying" implies documentation of the survey results, whereas the term "monitoring" implies the performance of a radiation and/or contamination check without documenting the results. It is not practical to document survey results for every item removed from the water when such items are placed back into the water shortly after being removed from the water.

8. New P-9 Setpoint

Source Document(s): PG&E Letter DCL-91-002 dated 1/4/91,
LER 1-90-014-00

Original Commitment (T34990)

To provide reasonable assurance that the turbine load will be reduced to allow the 51 RU relay to terminate a runback, the chosen software setpoint for the turbine runback low limit must be set for enough below the nominal 15 percent rated stator current setpoint to account for all operating configurations.

Revised Commitment

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Delete commitment. Permissive P9 has been restored to original setting of 50 percent RTP.

Justification for Change

The P9 setpoint was reduced to 15 percent RTP in accordance with justification for continued operation (JCO) 91-02. The concerns of JCO 91-02 were unreliability of the Circulating Water Pumps (CWP) to restart after a reactor transient and unreliable operation of the 40 percent steam dump valves. The CWP issue was addressed by DCP E-49315/50315 which revised the Auto-Start logic and the Steam Dump Valve micro bonding issue was addressed with NCR N0001476 (NCR-DC0-90-TI-N091), which replaced the valve trim with a different material and new seating angle. With these modifications, the assumptions of Westinghouse analysis PGE-87-134, which is the bases for License Amendment 30 and 29, remain valid and support restoring the P9 setpoint to 50 percent RTP.

9. NPG Management and Quality Concerns Lists

Source Document(s): PG&E Letter DCL 87-136 dated 6/15/87,
PG&E Letter DCL 89-006 dated 1/6/89

Original Commitment (T35694)

PG&E has developed an "NPG Management Concern's List" to identify major problems that need resolution. This list will be an agenda item for the weekly NPG Manager's Meetings, as required, to assure timely resolution.

Revised Commitment

The Quality Problem Assessment Report (QPAR) and Action Request Review Team (ARRT) program supersedes the "NPG Management Concern List" as a more diverse and more qualitative process. The QPAR provides a means to identify and focus management's attention to significant items and potential precursors. The frequent meetings of the ARRT provides all DCP related organizations a method to ensure timely evaluation and resolution of problems with the proper level of resources and management oversight.

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Justification for Change

The development of the Trend Analysis Program and development of the "Quality Performance Assessment Report" which is submitted to SVPG & CNO, NSOC, PSRC, and management of affected departments supersedes the Concerns List.

10. Procedure Revised to Systematically Vent and Fill the Safety Injection System

Source Document(s): PG&E Letter DCL 99-091 dated 7/23/99

Original Commitment (T36078)

Operations Procedure OP B-3A:1, "Safety Injection System-Make Pumps Available," will be revised to systematically vent and fill the SI system component and piping, and then flush the system to the reactor vessel with the RHR pumps.

Revised Commitment

Operations Procedure OP B-3A:1, "Safety Injection System-Make Pumps Available," will be revised to systematically vent and fill the SI system component and piping, and then followed by a flush of the system to the reactor vessel. One method could be to use STP V-15 to flush to the vessel.

Justification for Change

The commitment specifies that the system is flushed to the reactor vessel using the RHR pumps. However, the important part of the commitment is that the SI system component and piping is systematically filled and vented, and then the system is flushed to the reactor vessel. The particular pumps used are not important as long as the system is adequately flushed to the reactor vessel. The SI pumps will adequately flush the system to the reactor vessel.

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11. Procedure Revisions Due to EPRI Guidelines

Source Document(s): DCL 88-064 dated 3/24/88

Original Commitment (T31179)

Original commitment required PG&E to read and record condenser air ejector radiation monitor (RM)-15 every 4 hours \pm 1 hour and also committed to specific plant operation, sampling and shutdown depending on sampling equipment capability and specific steam generator primary to secondary leakage.

Revised Commitment

Revise applicable procedures in accordance with Electric Power Research Institute (EPRI) guidelines, currently EPRI T-104788 "PWR Primary to Secondary Leak Monitoring Guidelines," Revision 2, April 2000.

Justification for Change

The original commitment was made prior to EPRI's involvement in this issue. Since 1988, EPRI has been involved in the analysis of the problem based on available industry experience and has provided guidelines, first in 1995, later in Rev. 1, 1997 and most recently in Rev. 2, April 2000. PG&E's commitment should be based on the most recent data and recommendations available at this time.

12. Personnel Responsibilities for the FHB Activities

Source Document(s): PG&E Letter DCL 90-006 dated 1/5/90

Original Commitment (T32524)

Add the requirement to PG&E procedures OP B-8DS1, B-8DS2, B-8DS3, B-8F & B-8H to brief fuel handling personnel on each shift of the proper actions for a FHB high radiation alarm. Add a requirement to AR PK 11-10 to make a PA announcement for any FHB high radiation alarm.

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Revised Commitment

Revise PG&E procedures OP B-8DS1, B-8DS2, B-8DS3, B-8F & B-8H to include a description of all actions to be taken by the fuel moving team upon a high radiation alarm on the FHB during the pre-evolution briefing.

Justification for Change

The original commitment was the result of a high alarm setpoint that was set too conservatively. Instead of alerting the fuel handling team of an impending dangerous situation, it caused the numerous unwarranted alarms to which the crew became callous. The alarm set point has been raised to a level appropriate to provide protective function, but to avoid "spurious" alarms. It has also been modified to have two levels of alarm condition; a local alarm at a lower level to alert the crew to changing conditions, and a ventilation mode shifting, FHB evacuation sounding alarm at a significantly higher level.

Due to the varied schedules of those participating in fuel handling operations it means stopping the evolution up to 9 times per shift to ensure that all personnel are properly briefed per the procedure on the action required for a high radiation alarm.

The amount of time that PG&E spends fuel handling has dropped dramatically over the past 11 years. PG&E uses a dedicated crew made up of PG&E and contract refueling personnel who are briefed in detail at a pre-evolution tailboard. This tailboard includes all the pertinent information from the procedure, lessons learned from past refueling events and safety issues like those surrounding high radiation alarms and the appropriate actions to take in the event of high radiation, both in containment and the fuel handling building.

The fuel handling crew and control room staffs are once again sensitized to the importance of these alarms. This is partly due to the change in the way the alarms are triggered and partly due to the cultural shift at DCP.

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13. Table of Acronyms

Acronym	Definition
AART	Action Request Review Team
AE	Action Evaluation
AP	Abnormal Procedure
AR	Action Request
ASWS	Auxiliary Saltwater System
CCW	Component Cooling Water
CCWS	Component Cooling Water System
CWP	Circulating Water Pump
DCL	Diablo Canyon Letter
DCPP	Diablo Canyon Power Plant
EDG	Emergency Diesel Generator
EOP	Emergency Operating Procedure
EP	Emergency Procedure
EPRI	Electric Power Research Institute
ESF	Engineered Safety Feature
FHB	Fuel Handling Building
FHS	Fuel Handling Supervisor
GM	General Manager
ITS	Improved Technical Specifications
JCO	Justification for Continued Operation
LA	License Amendment
LER	License Event Report
LOCA	Loss-of-Coolant Accident
NCR	Nonconformance Report
NEI	Nuclear Energy Institute
NPG	Nuclear Power Generation
NR	Narrow Range
NSOC	Nuclear Safety Oversight Committee
PORV	Power Operated Relief Valve
PSRC	Plant Staff Review Committee
QPAR	Quality Problem Assessment Report
RCP	Radiation Control Procedure
RCS	Reactor Coolant System
RHR	Residual Heat Removal
RM	Radiation Monitor
RP	Radiation Protection

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Acronym	Definition
RTP	Rated Thermal Power
Rx	Reactor
SFP	Spent Fuel Pool
SI	Safety Injection
SRO	Senior Reactor Operator
SSC	Structures, Systems, and Components
STP	Surveillance Test Procedure
SVP	Senior Vice-President
TOL	Thermal Overload
TS	Technical Specifications