



**Pacific Gas and
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PG&E Letter DCL-02-067

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
Comments on Draft Report NUREG-XXXX, "Technical Assessment Generic
Issue 186: Potential Risk and Consequences of Heavy Load Drops in Nuclear
Power Plants"

Dear Commissioners and Staff:

The purpose of this letter is to provide comments regarding draft report NUREG-XXXX, "Technical Assessment Generic Issue 186: Potential Risk and Consequences of Heavy Load Drops in Nuclear Power Plants," transmitted by NRC letter dated April 1, 2002.

The NRC letter requested a review of the draft NUREG to verify the accuracy of the data and information collected from Diablo Canyon Power Plant (DCPP).

PG&E has reviewed the information in the draft NUREG report, and has found one discrepancy in the information regarding DCPP. The entry in Table A1 for DIC1 for June 1993 is a duplicate of the DIC1 entry for April 1993. These entries correspond to the same event reported in two revisions of LER 1-92-029. As a result, the DIC1 entry for April 1993 should be deleted from Table A1 and all graphs and calculations including this entry as a crane event should be revised accordingly. For example, the total number of crane issues per licensed unit for DCPP should be reduced from 5 to 4.5 in Figure 11 of the draft NUREG report. Also, the remaining entry in Table A1 for DIC1 for June 1993 should be coded "NON" for Category 3 as opposed to "COMP," since no crane component issue was associated with this event.

It was also noted that the "COMP" column in Table A1 is not consistently described in the document. It appears to be part of "Category 3" in Table A1, and is referred to on pages 10, 11, 12, but is not included in Table 1 on page 6 or under the Category 3 issues on page A-1 of the Appendix.


Thank you for the opportunity to verify the input data to the draft NUREG.

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance
Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

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Please contact Mr. Pat Nugent at (805) 545-4720 if you have any questions.

Sincerely,



James E. Tomkins
Director, Nuclear Quality, Analysis and Licensing

nih

cc: Diablo Distribution
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