July 10, 1989

Docket Nos. 50-275
and 50-323

Mr. J. D. Shiffer, Vice President
Nuclear Power Generation
c/o Nuclear Power Generation, Licensing
Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

Dear Mr. Shiffer:

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SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. 67008 AND 67009)

The Commission has issued the enclosed Amendment No. 42 to Facility Operating License No. DPR-80 and Amendment No. 41 to Facility Operating License No. DPR-82 for the Diablo Canyon Power Plant (DCPP), Unit Nos. 1 and 2, respectively. The amendments consist of changes to the combined Technical Specifications (TS) in response to your application dated January 22, 1988 (Reference LAR 88-02), as supplemented by your letter dated May 15, 1989.

Specifically, the amendments revise Technical Specification 3/4.3.4, "Turbine Overspeed Protection," to (1) change the frequency of stroke testing of the main turbine valves from weekly to quarterly and (2) change the frequency of the direct observation of valve movement from every 31 days to quarterly. The amendments also delete a footnote to TS 3/4.3.4 that is no longer applicable.

A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's next regular biweekly Federal Register notice.

Also enclosed are Pages xxi and xxii of the Technical Specifications. Page xxii was revised in Amendments 37 and 36 and, through administrative error, an incorrect page was issued as the overleaf page.

Sincerely,

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V, and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 42 to DPR-80
2. Amendment No. 41 to DPR-82
3. Safety Evaluation
4. TS Pages xxi and xxii

cc w/enclosures:
See next page



| DRSP/PD5 | DRSP/PD5 | DOEA/OTSB | DEST/SELB | OGC | DRSP/D:PD5 |
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*See Previous Concurrence

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Docket Nos. 50-275
and 50-323

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| JLee | HRood:dr | JCalvo | for JCraig | | GKnighton |
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 10, 1989

Docket Nos. 50-275
and 50-323

Mr. J. D. Shiffer, Vice President
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c/o Nuclear Power Generation, Licensing
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Sincerely,

Harry Rood

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V, and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 42 to DPR-80
2. Amendment No. 41 to DPR-82
3. Safety Evaluation
4. TS Pages xxi and xxii

cc w/enclosures:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON NUCLEAR POWER PLANT, UNIT 1

DOCKET NO. 50-275

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 42
License No. DPR-80

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Pacific Gas & Electric Company (the licensee), dated January 22, 1988, as supplemented by letter dated May 15, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON D C. 20555

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON NUCLEAR POWER PLANT, UNIT 2

DOCKET NO. 50-323

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 41
License No. DPR-82

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Pacific Gas & Electric Company (the licensee), dated January 22, 1988, as supplemented by letter dated May 15, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-82 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 41, are hereby incorporated in the license. Pacific Gas & Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment becomes effective at the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

for Charles M. Trammell

George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III, IV, V, and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical Specifications

Date of Issuance: July 10, 1989

ATTACHMENT TO LICENSE AMENDMENT NOS. 42 AND 41

FACILITY OPERATING LICENSE NOS. DPR-80 and DPR-82

DOCKET NOS. 50-275 AND 50-323

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change.

| Remove Page | Insert Page |
|---|---|
| 3/4 3-69 | 3/4 3-69 |
| B 3/4 3-5 | B 3/4 3-5 |

INSTRUMENTATION

## 3/4.3.4 TURBINE OVERSPEED PROTECTION

### LIMITING CONDITION FOR OPERATION

3.3.4.1 At least one Turbine Overspeed Protection System shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3 (during turbine operation).

ACTION:

a. With one stop valve or one control valve per high pressure turbine steam line inoperable or with one reheat stop valve or one reheat intercept valve per low pressure turbine steam line inoperable, restore the inoperable valve(s) to OPERABLE status within 72 hours, or isolate the turbine from the steam supply within the next 6 hours.

b. With the above required Turbine Overspeed Protection System otherwise inoperable, within 6 hours isolate the turbine from the steam supply.

### SURVEILLANCE REQUIREMENTS

4.3.4.1.1 The provisions of Specification 4.0.4 are not applicable.

4.3.4.1.2 The above required Turbine Overspeed Protection System shall be demonstrated OPERABLE:

a. At least once per quarter by cycling and direct observation of the movement of each of the following valves through at least one complete cycle from the running position:

   1) Four high pressure turbine stop valves,

   2) Four high pressure turbine control valves,

   3) Six low pressure turbine reheat stop valves, and

   4) Six low pressure turbine reheat intercept valves.

b. At least once per 18 months by performance of a CHANNEL CALIBRATION on the Turbine Overspeed Protection Systems.

c. At least once per 40 months by disassembling at least one of each of the above valves and performing a visual and surface inspection of valve seats, disks and stems and verifying no unacceptable flaws or corrosion.

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3/4.3.3.10 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The Alarm/Trip Setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCP to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. This instrumentation also includes provisions for monitoring (and controlling) the concentrations of potentially explosive gas mixtures in the GASEOUS RADWASTE SYSTEM. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50. The sensitivity of any noble gas activity monitors used to show compliance with the gaseous effluent release requirements of Specification 3.11.2.2 shall be such that concentrations as low as 1 x 10-5 mCi/ml are measurable.

3/4.3.4 TURBINE OVERSPEED PROTECTION

This specification is provided to ensure that the turbine overspeed protection instrumentation and the turbine speed control valves are OPERABLE and will protect the turbine from excessive overspeed. Protection from turbine excessive overspeed is required since excessive overspeed of the turbine could generate potentially damaging missiles which could impact and damage safety related components, equipment or structures.

The quarterly valve test frequency required by Specification 4.3.4.1.2a, is based on Diablo Canyon operating experience and the results of an evaluation documented in WCAP-11525, "Probabilistic Evaluation of Reduction in Turbine Valve Test Frequency," June 1987. The evaluation shows that for Diablo Canyon the probability of turbine missile generation is within the NRC acceptance criteria (letter from C. E. Rossi, USNRC, to J. A. Martin, Westinghouse, dated February 2, 1987) for turbine valve test intervals up to seven months.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 42 TO FACILITY OPERATING LICENSE NO. DPR-80

AND AMENDMENT NO. 41 TO FACILITY OPERATING LICENSE NO. DPR-82

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-275 AND 50-323

## 1.0 INTRODUCTION

By letter dated January 22, 1988 (Reference LAR 88-02), as supplemented by letter dated May 15, 1989, Pacific Gas and Electric Company (PG&E or the licensee) requested amendments to the combined Technical Specifications (TS) appended to Facility Operating License Nos. DPR-80 and DPR-82 for the Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2, respectively. The amendments change the TS by revising the surveillance test frequency of the turbine stop valves, control valves and the intercept valves associated with the turbine overspeed protection system. Surveillance testing of these valves is necessary to assure that they are capable of performing their safety function in protecting against the consequences of a turbine missile ejection accident.

The amendments change TS 3/4.3.4, "Turbine Overspeed Protection," to revise, from weekly to quarterly, the frequency of surveillance testing by cycling the turbine stop valves, control (governor) valves, and intercept valves. The amendments also revise, from monthly to quarterly, the frequency of direct observation of the movement of each of the above valves, through one complete cycle from the running position. The amendments also modify the bases of the TS to be consistent with the above changes, and remove from the TS a footnote which is no longer applicable.

## 2.0 EVALUATION

The licensee tests ten stop valves, six intercept valves and four control valves for each turbine during a typical weekly test. The operational testing of the turbine valves consists of cycling the valve through at least one complete cycle from the running position. The reactor power level must be reduced to approximately 90% to conduct the test. This cycling of the reactor power places unnecessary thermal and pressure cycles on plant equipment, and increases the likelihood of inadvertent reactor trips during the power reduction and return to full

power transients. Based on this, the staff concludes that the margin of safety is reduced when the plant is undergoing turbine valve testing.

In its application for amendments dated January 22, 1988, the licensee stated that the operating experience of both units to date and the performance of these surveillances have disclosed no significant problems relating to the capability or function of the turbine overspeed protection system. During this period the Unit 1 valves have undergone 125 surveillance tests and the Unit 2 valves have undergone 85 tests, with no identified valve sticking or other equipment problems. In addition, four Unit 1 turbine valves were disassembled and inspected in 1986, and eight Unit 2 turbine valves were disassembled and inspected in 1987. No unfavorable observations were made with respect to valve closure functions.

In support of this amendment request, the licensee referenced an evaluation performed by Westinghouse Electric Corporation for the Westinghouse Owners Group Turbine Valve Test Frequency Subgroup. The results of this evaluation are documented in the Westinghouse Electric Corporation Topical Report WCAP-11525, "Probabilistic Evaluation of Reduction in Turbine Valve Test Frequency," dated June 1987. This report provides a detailed probabilistic analysis demonstrating that a significant increase in the interval between turbine valve functional tests can be achieved without exceeding the NRC acceptance criteria for the probability of a turbine missile accident. In WCAP-11525, the calculated probability of a turbine missile ejection is given for the turbines at Diablo Canyon. The effect of extending the time interval of turbine valve testing was included in the analysis. As is discussed below, the methodology and the results have been reviewed by the NRC staff and found acceptable.

The NRC staff has reviewed the methodology described in WCAP-11525 and has found it acceptable. Diablo Canyon and the Prairie Island Nuclear Generating Plant, Units Nos. 1 and 2 were reviewed as joint lead plants for plant-specific implementation of this methodology. The staff's approval of the methodology described in Westinghouse Topical Report WCAP-11525 is documented in a supplemental safety evaluation issued with amendments to the operating licenses for the Prairie Island Nuclear Generating Plant, Units Nos. 1 and 2. See the letter dated February 7, 1989, from Dominic C. DiIanni (NRC) to D. M. Musolf (Northern States Power Company), "Amendments Nos. 86 and 79 to Facility Operating Licenses Nos. DPR-42 and DPR-60: Turbine Valve Test Frequency Reduction - TACS Nos. 66867 and 66868", Docket Nos. 50-282 and 50-306.

The NRC staff's criteria for turbine missile generation probability are given in a letter dated February 2, 1987, to Mr. James A. Martin of the Westinghouse Electric Corporation. In this letter, the NRC staff stated that maintaining, through testing and inspection, an initial small value of the probability of turbine failure resulting in the ejection of fragments through the turbine casing is a reliable means of precluding turbine missiles and unacceptable damage to safety-related structures,

systems, and components. Maintaining an initial small value of the probability of a turbine failure simplifies and improves procedures for evaluation of turbine missile risks and ensures that the public health and safety is maintained. To implement these objectives, the staff proposed turbine failure guidelines for total turbine missile generation probabilities to be used for determining (1) frequencies of turbine disc ultrasonic inspections and (2) maintenance and testing schedules for turbine control and overspeed protection systems.

In the February 2, 1987 letter to Westinghouse, the NRC staff stated that its acceptance criteria for turbine reliability is a turbine missile generation probability of less than $1 \times 10^{-4}$ per year for a favorably-oriented turbine and less than $1 \times 10^{-5}$ per year for an unfavorably-oriented turbine. This provides adequate assurance that the guidelines values of Section 2.2.3 of the Standard Review Plan are satisfied.

The mean annual probabilities of turbine missile ejection for Diablo Canyon Units 1 and 2, calculated using WCAP-11525 methodology and the available data, show a small increase in the missile ejection probability as the mean test interval increases from one month to three months. However, the calculated values over this range of test intervals are all well within the applicable acceptance criterion of $1 \times 10^{-5}$ per year. The staff, therefore, considers that the calculated values for Diablo Canyon contain adequate margins for protection against turbine missiles, and consider the reduction in margin due to increased test interval to be not significant.

While the WCAP-11525 methodology is acceptable, the values calculated using this methodology are external to the methodology and are subject to change as more failure data becomes available. In considering missile ejection probabilities calculated by using the WCAP-11525 methodology based on new failure data, the staff requested that the licensee provide assurance that the test frequencies contain adequate margins for protection against potential adverse effects due to discrepancies in implementation.

In its letter of May 15, 1989, the licensee agreed to work with the turbine vendor to maintain a turbine valve failure database for the purpose of tracking changes in valve failure rate. In its May 15, 1989 letter, the licensee also committed to include information on valve failure rate in the Diablo Canyon Final Safety Analysis Report (FSAR) Update, and to update the failure rate information included in the FSAR at least once every three years. The licensee also committed to review and reevaluate, in accordance with 10 CFR 50.59, the turbine valve testing frequency probabilistic analysis (using WCAP-11525 methodology) any time that major changes in the turbine system have been made, or a significant upward trend in the valve failure rate is identified. These commitments have been reviewed by the staff and constitute an acceptable method of addressing the issue of future changes in failure data.

In conclusion, the licensee has shown that while increasing the frequency of turbine valve testing results in a small increase in turbine missile generation probability, the probability at Diablo Canyon is still well within the staff's acceptance criteria. In addition, this reduction in safety margin due to decreased testing frequency is compensated by the fact that during turbine valve testing, the likelihood of a plant accident is increased, because power must be temporarily reduced to perform the testing. Further, operating experience shows that during plant operation to date, there have been no incidents of unplanned turbine overspeed nor a turbine valve malfunction that could have led to a turbine overspeed condition. Based on this operating experience, the Westinghouse analysis of Diablo Canyon demonstrating that the plant meets the NRC guidelines for turbine missile generation probability, and the safety benefits of a reduction in the frequency of power transients, the staff finds the proposed change in testing frequency to be acceptable.

## 3.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an Environmental Assessment and Finding of No Significant Impact was issued for these amendments on May 4, 1989 at 54 FR 19263. Based on the environmental assessment, the Commission has determined that the issuance of the amendments will not have a significant effect on the quality of the human environment.

## 4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: H. Rood

Dated: July 10, 1989

7590-01

UNITED STATES NUCLEAR REGULATORY COMMISSION

PACIFIC GAS AND ELECTRIC COMPANY

DOCKETS NOS. 50-275 AND 50-323

NOTICE OF ISSUANCE OF AMENDMENTS TO

FACILITY OPERATING LICENSES

The United States Nuclear Regulatory Commission (the Commission) has issued Amendments Nos. 42 and 41 to Facility Operating Licenses Nos. DPR-80 and DPR-82, issued to the Pacific Gas and Electric Company (the licensee), which revised the Technical Specifications (TS) for operation of the Diablo Canyon Power Plant, Unit Nos. 1 and 2, located in San Luis Obispo County, California. The amendments are effective as of the date of issuance.

The amendments change the Technical Specifications by revising the surveillance test frequency of the turbine stop valves, the governor valves and the intercept valves associated with the turbine overspeed protection.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations. The Commission has made appropriate findings, as required by the Act and the Commission's regulations in 10 CFR Chapter I, which are set forth in the license amendments.

Notice of Consideration of Issuance of Amendments to Facility Operating Licenses and Opportunity for Hearing in connection with this action was published in the FEDERAL REGISTER on May 18, 1988 (53 FR 17806). No request for hearing or petition to intervene was filed following this notice.

Also in connection with this action, the Commission prepared an Environmental Assessment and Finding of No Significant Impact which was published in the FEDERAL REGISTER on May 4, 1989 at 54 FR 19263.

For further details with respect to this action, see (1) the application for amendments dated January 22, 1988, as supplemented by letter dated May 15, 1989, (2) Amendments Nos. 42 and 41 to Licenses Nos. DPR-80 and DPR-82, and (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 2120 L Street, NW., Washington, DC 20555, and at the California Polytechnic State University Library, Government Documents and Maps Department, San Luis Obispo, California 93407. A copy of items (2) and (3) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Director, Division of Reactor Projects - III, IV, V and Special Projects.

Dated at Rockville, Maryland, this 10th day of July, 1989.

FOR THE NUCLEAR REGULATORY COMMISSION

Harry Rood

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation