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

September 6, 1991

Docket Nos. 50-275
and 50-323

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

Dear Mr. Shiffer:

SUBJECT: ISSUANCE OF AMENDMENTS FOR DIABLO CANYON NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 (TAC NOS. 80243 AND 80244)

The Commission has issued the enclosed Amendment No. 66 to Facility Operating License No. DPR-80 and Amendment No. 65 to Facility Operating License No. DPR-82 for the Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2, respectively. The amendments respond to your amendment application dated March 18, 1991, as supplemented by your letter dated May 3, 1991 (reference License Amendment Request LAR 91-02).

These amendments revise the combined technical specifications (TS) for the Diablo Canyon Power Plant (DCPP) Unit Nos. 1 and 2 to revise TS 3/4.7.7.1, "Snubbers," and the associated Bases to make the snubber visual inspection intervals and corrective actions conform to the recommendations of Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

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

Sincerely,

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

Enclosures:
1. Amendment No. 66 to License No. DPR-80
2. Amendment No. 65 to License No. DPR-82
3. Safety Evaluation

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DATE	08/13/91	08/8/91	08/15/91	08/16/91	08/16/91

OFFICIAL RECORD COPY Document Name: DIABLO AMENDMENTS LAR 91-02

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

Sincerely,

Harry Rood

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

Enclosures:
1. Amendment No. 66 to License No. DPR-80
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3. Safety Evaluation

cc w/enclosures:
See next page

Mr. J. D. Shiffer
Pacific Gas and Electric Company

Diablo Canyon

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

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-275

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 66
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 March 18, 1991, as supplemented by letter dated May 3, 1991 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-80 is hereby amended to read as follows:

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(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 66 , 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 as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

James E. Dyer

James E. Dyer, Director
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 6, 1991

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

PACIFIC GAS AND ELECTRIC COMPANY

DIABLO CANYON NUCLEAR POWER PLANT, UNIT NO. 2

DOCKET NO. 50-323

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 65
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 March 18, 1991, as supplemented by letter dated May 3, 1991 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. 65 , 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 as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

James E. Dyer

James E. Dyer, Director
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 6, 1991

ATTACHMENT TO LICENSE AMENDMENT NOS. 66 AND 65

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

DOCKET NOS. 50-275 AND 50-323

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. Overleaf pages are also included, as appropriate.

REMOVE PAGE	INSERT PAGE
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3/4 7-19	3/4 7-19
3/4 7-20	3/4 7-20
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3/4.7.8 SEALED SOURCE CONTAMINATION

The limitation on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(a)(3) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e., sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.9 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the Fire Suppression Systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The Fire Suppression System consists of the water system, spray and/or sprinklers, CO_2, Halon, and fire water hose stations. The collective capability of the Fire Suppression Systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility Fire Protection Program.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

The Surveillance Requirements provide assurance that the minimum OPERABILITY requirements of the Fire Suppression Systems are met. An allowance is made for ensuring a sufficient volume of Halon in the Halon storage tanks by verifying the weight of the tanks.

In the event the Fire Suppression Water System becomes inoperable, prompt corrective measures must be taken since this system provides the major fire suppression capability of the plant.

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3/4.7.6 AUXILIARY BUILDING SAFEGUARDS AIR FILTRATION SYSTEM

The OPERABILITY of the Auxiliary Building Safeguards Air Filtration System ensures that radioactive materials leaking from the ECCS equipment within the auxiliary building following a LOCA are filtered prior to reaching the environment. Operation of the system with the heaters operating to maintain low humidity for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The operation of this system and the resultant effect on offsite dosage calculations were assumed in the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.7.7 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Plant Staff Review Committee. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection during an earthquake or severe transient. The method for determining the next interval for the visual inspection of snubbers is provided based upon the number of unacceptable snubbers found during the previous inspection, the category size, and the previous inspection interval per NRC Generic Letter 90-09. A snubber is considered unacceptable if it fails to satisfy the acceptance criteria of the visual inspection.

SURVEILLANCE REQUIREMENTS (Continued)

2) Verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 73,500 cfm ± 10%;

3) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 6%; and

4) Verifying a system flow rate of 73,500 cfm ± 10% during system operation when tested in accordance with ANSI N510-1980.

c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 6%;

d. At least once per 18 months by:

1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 3.7 inches Water Gauge while operating the system at a flow rate of 73,500 cfm ± 10%,

2) Verifying that flow is established through the HEPA filter and charcoal adsorber bank on a Safety Injection test signal, and

3) Verifying that the heaters dissipate 50 ± 5 kW when tested in accordance with ANSI N510-1980.

e. After each complete or partial replacement of a HEPA filter bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the system at a flow rate of 73,500 cfm ± 10%; and

f. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1% in accordance with ANSI N510-1980 for a halogenated hydrocarbon test gas while operating the system at a flow rate of 73,500 cfm ± 10%.

3/4.7.8 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.8.1 Each sealed source containing radioactive material in excess of 100 microcuries of beta and/or gamma emitting material or 10 microcuries of alpha-emitting material shall be free of greater than or equal to 0.005 microcurie of removable contamination.

APPLICABILITY: At all times.

ACTION:

a. With a sealed source having removable contamination in excess of the above limits, immediately withdraw the sealed source from use, and either:

   1. Decontaminate and repair the sealed source, or

   2. Dispose of the sealed source in accordance with Commission Regulations.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.1.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

a. The licensee, or

b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microcurie per test sample.

4.7.8.1.2 Test Frequencies - Each category of sealed sources (excluding startup sources and fission detectors previously subjected to core flux) shall be tested at the frequency described below.

a. Sources in use - At least once per 6 months for all sealed sources containing radioactive materials:

   1) With a half-life greater than 30 days (excluding Hydrogen 3), and

   2) In any form other than gas.

SURVEILLANCE REQUIREMENTS (Continued)

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.7.1e. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

c. Transient Event Inspection

A visual inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data. This inspection shall be performed within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

Table 4.7-2
SNUBBER VISUAL INSPECTION INTERVAL

Category Size (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the decision must be made and documented before any inspection and this decision shall be used as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

SURVEILLANCE REQUIREMENTS (Continued)

d. Functional Tests (Continued)

Testing equipment failure during functional testing may invalidate that day's testing and allow that day's testing to resume anew at a later time provided all snubbers tested with the failed equipment during the day of equipment failure are retested. The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure, as far as practicable, that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same location as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional test results shall be reviewed at that time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

e. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

1) Activation (restraining action) is achieved within the specified range in both tension and compression;

2) Snubber bleed, or release rate where required, is present in both tension and compression, within the specified range;

3) For mechanical snubbers, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and

4) For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.

Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

f. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

SURVEILLANCE REQUIREMENTS (Continued)

f. Functional Test Failure Analysis (Continued)

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the design service.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen-in-place, the cause will be evaluated and, if caused by manufacturer or design deficiency, all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.7.1d. for snubbers not meeting the functional test acceptance criteria.

g. Functional Testing of Repaired and Replaced Snubbers

Snubbers that fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers that have repairs which might affect the functional test results shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

h. Snubber Service Life Program

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.

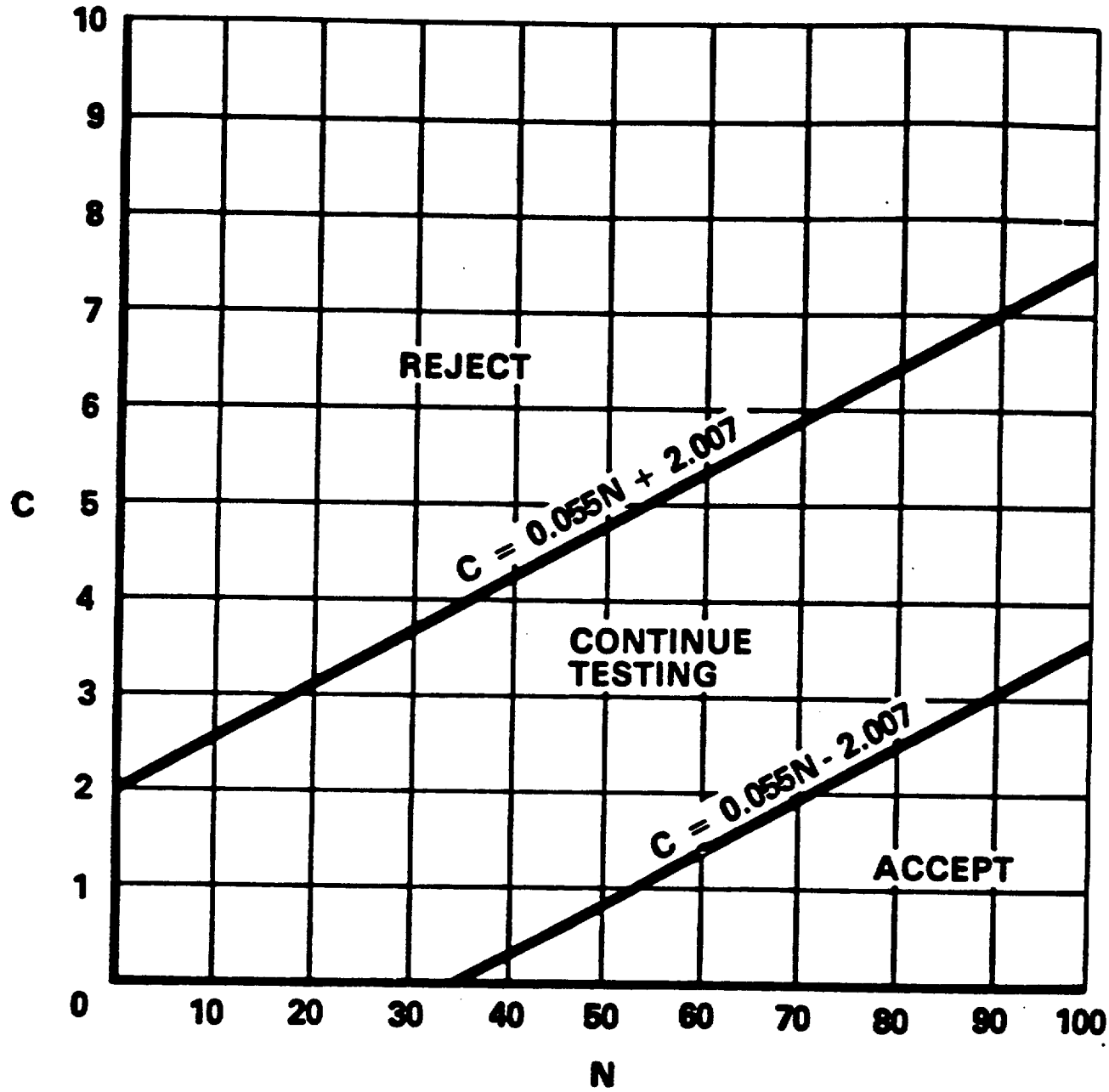

FIGURE 4.7-1

SAMPLE PLAN 2) FOR SNUBBER FUNCTIONAL TEST

SURVEILLANCE REQUIREMENTS (Continued)

d. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers of each type shall be tested using one of the following sample plans. As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected for each snubber type prior to the test period or the sample plan used in the prior test period shall be implemented:

1) At least 10% of the total of each type of snubber shall be functionally tested either in place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.7.1e., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or

2) A representative sample of each type of snubber shall be functionally tested in accordance with Figure 4.7-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.7.1e. The cumulative number of snubbers of a type tested is denoted by "N". At the end of each day's testing, the new values of "N" and "C" (previous day's total plus current day's increments) shall be plotted on Figure 4.7-1. If at any time the point plotted falls in the "Reject" region, all snubbers of that type shall be functionally tested. If at any time the point plotted falls in the "Accept" region, testing of snubbers of that type may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers of that type shall be tested until the point falls in the "Accept" region or the "Reject" region, or all the snubbers of that type have been tested; or

3) An initial representative sample of 55 snubbers shall be functionally tested. For each snubber type which does not meet the functional test acceptance criteria, another sample of at least one-half the size of the initial sample shall be tested until the total number tested is equal to the initial sample size multiplied by the factor, $1 + C/2$, where "C" is the number of snubbers found which do not meet the functional test acceptance criteria. The results from this sample plan shall be plotted using an "Accept" line which follows the equation $N = 55(1 + C/2)$. Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

Table 4.7-2 (continued)
SNUBBER VISUAL INSPECTION INTERVAL

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Column B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

3/4.7.7 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.7.1 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.7.1f. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.7.1 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Visual Inspections

Snubbers may be categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently or jointly according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment Nos. 66 and 65.

3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION

The limitation on steam generator pressure and temperature ensures that the pressure induced stresses in the steam generators do not exceed the maximum allowable fracture toughness stress limits. The limitations of 70°F and 200 psig are based on average steam generator impact values taken at 10°F and are sufficient to prevent brittle fracture.

3/4.7.3 VITAL COMPONENT COOLING WATER SYSTEM

The OPERABILITY of the Vital Component Cooling Water System ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analyses.

3/4.7.4 AUXILIARY SALTWATER SYSTEM

The OPERABILITY of the Auxiliary Saltwater System ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analyses.

3/4.7.5 CONTROL ROOM VENTILATION SYSTEM

The OPERABILITY of the Control Room Ventilation System ensures that: (1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system, and (2) the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix A, 10 CFR Part 50. Operation of the system with the heaters operating to maintain low humidity using automatic control for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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SNUBBERS (Continued)

Any inspection whose results require a shorter inspection interval will override the previous schedule.

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing.

To provide assurance of snubber functional reliability, one of three functional testing methods is used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or

2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1, or

3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of its fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 66 TO FACILITY OPERATING LICENSE NO. DPR-80

AND AMENDMENT NO. 65 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 March 18, 1991, as supplemented by letter dated May 3, 1991, Pacific Gas and Electric Company (PG&E or the licensee) requested amendments to Facility Operating License DPR-80 and DPR-82 for Diablo Canyon Units 1 and 2, respectively. The amendment application is designated License Amendment Request LAR 91-02. The amendments change the combined Diablo Canyon technical specifications (TS) by revising TS 3/4.7.7.1, "Snubbers," and the associated Bases to make the snubber visual inspection intervals and corrective actions conform to the recommendations of Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," issued on December 11, 1990.

2.0 EVALUATION

The snubber visual examination schedule in the previous TS was based on the permissible number of inoperable snubbers found during the visual examination. Because the previous snubber visual examination schedule was based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensees with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided by the previous visual examination schedule. The revised visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle, up to 24 months. This interval may be extended to as long as twice the fuel cycle or reduced to as small as two-thirds of the fuel cycle depending on the number of unacceptable snubbers found during the visual examination. The examination interval may vary by plus or minus 25 percent to coincide with the actual outage.

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In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCOs) in the previous TS required the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours or declare the attached system inoperable and follow the appropriate action statement for that system. This LCO will remain in the amended TS. However, the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule given in Table 1 of GL 90-09. As noted in the guidance in GL 90-09 for this line item TS improvement, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements for corrective actions and evaluations associated with the use of visual examination schedule and stated in footnotes 1 through 7 of GL 90-09 have been included in the TS.

In summary, the licensee has proposed changes to TS 3/4.7.7.1, "Snubbers," that are consistent with the guidance provided in GL 90-09 for the replacement of the snubber visual examination schedule with Table 1 (including footnotes 1 through 7) of GL 90-09. On the basis of its review of this matter, the NRC staff finds that the proposed changes to the Diablo Canyon TS are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of these amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 22471). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). The basis for this determination is that the new snubber visual examination schedule will permit the licensee to perform visual examinations and corrective action during outages, resulting in a decrease in individual or cumulative occupational radiation exposure. Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

The Commission has proposed to determine that these amendments involve no significant hazards consideration. The proposed determination was published in the Federal Register on May 15, 1991 at 56 FR 22471. No public comments or requests for hearing were received.

The NRC staff has 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 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 Contributors: J. Rajan
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Dated: September 6, 1991