

April 1, 1993

Docket Nos. 50-275
and 50-323

Mr. Gregory M. Rueger
Nuclear Power Generation, B14A
Pacific Gas and Electric Company
77 Beale Street, Room 1451
P.O. Box 770000
San Francisco, California 94177

Dear Mr. Rueger:

SUBJECT: ISSUANCE OF AMENDMENTS FOR DIABLO CANYON NUCLEAR POWER PLANT,
UNIT NO. 1 (TAC NO. M79425) AND UNIT NO. 2 (TAC NO. M79426)

The Commission has issued the enclosed Amendment No. 80 to Facility Operating License No. DPR-80 and Amendment No. 79 to Facility Operating License No. DPR-82 for the Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated November 15, 1990, as supplemented June 20, 1991, October 8, 1991 and June 5, 1992 (Reference LAR 90-12).

These amendments would permit leakage past the auxiliary building safeguard air filtration system dampers M2A and M2B at Diablo Canyon. The proposed change would modify surveillance requirement 4.7.6.1 to permit these dampers to have a leakage rate of 5 cubic feet per minute or less when tested in accordance with American Society of Mechanical Engineers (ASME) Standard ASME N510-1989.

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,

Original signed by:

Sheri R. Peterson, Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 80 to DPR-80
2. Amendment No. 79 to DPR-82
3. Safety Evaluation

cc w/enclosures:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Pacific Gas and Electric Company
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These amendments would permit leakage past the auxiliary building safeguard air filtration system dampers M2A and M2B at Diablo Canyon. The proposed change would modify surveillance requirement 4.7.6.1 to permit these dampers to have a leakage rate of 5 cubic feet per minute or less when tested in accordance with American Society of Mechanical Engineers (ASME) Standard ASME N510-1989.

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,

A handwritten signature in cursive script that reads "Sheri R. Peterson".

Sheri R. Peterson, Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 80 to DPR-80
2. Amendment No. 79 to DPR-82
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. Gregory M. Rueger
Pacific Gas and Electric Company

Diablo Canyon

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Diablo Canyon Independent Safety Committee
ATTN: Robert R. Wellington, Esq.
Legal Counsel
857 Cass Street, Suite D
Monterey, California 93940



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PACIFIC GAS AND ELECTRIC COMPANY

DOCKET NO. 50-275

DIABLO CANYON NUCLEAR POWER PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 80
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 November 15, 1990, as supplemented June 20, 1991, October 8, 1991 and June 5, 1992, 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 rules and 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:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 80, 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 is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

for *Charles M. Trammell*
Theodore R. Quay, 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: April 1, 1993



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PACIFIC GAS AND ELECTRIC COMPANY

DOCKET NO. 50-323

DIABLO CANYON NUCLEAR POWER PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 79
License No. DPR-82

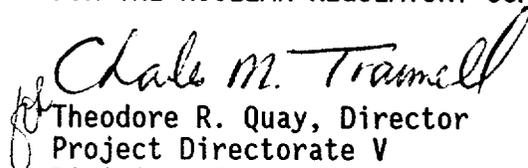
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Pacific Gas & Electric Company (the licensee) dated November 15, 1990, as supplemented June 20, 1991, October 8, 1991 and June 5, 1992, complies with the standards and requirements of the Atomic 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 rules and 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. 79, 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 is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Theodore R. Quay, 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: April 1, 1993

ATTACHMENT TO LICENSE AMENDMENTS

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

AND AMENDMENT NO. 79 TO FACILITY OPERATING LICENSE NO. 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

3 of 6
3/4 7-16
3/4 7-17

INSERT

3 of 6
3/4 7-16
3/4 7-17
3/4 7-17a

APPENDIX A TO LICENSE NOS. DPR-80 AND DPR-82
DIABLO CANYON NUCLEAR POWER PLANT UNITS 1 AND 2 TECHNICAL SPECIFICATIONS (NUREG-1151)

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PLANT SYSTEMS

3/4.7.6 AUXILIARY BUILDING SAFEGUARDS AIR FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.1 Two Auxiliary Building Safeguards Air Filtration System exhaust trains with one common HEPA filter and charcoal adsorber bank and at least two exhaust fans shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the HEPA filter and charcoal adsorber bank inoperable, restore the HEPA filter and charcoal adsorber bank to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With only one exhaust fan OPERABLE, restore at least two exhaust fans to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.6.1 Each Auxiliary Building Safeguards Air Filtration System train shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 - 1) Initiating flow through the HEPA filter and charcoal adsorber bank and verifying that the train operates for at least 10 continuous hours with the heaters operating, and
 - 2) Verifying that each exhaust fan is aligned to receive electrical power from a separate OPERABLE vital bus.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system, by:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- e. 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 3.5 inches Water Gauge while operating the system at a flow rate of 2100 cfm \pm 10%;
 - 2) Verifying that on a Phase "A" Isolation test signal, the system automatically switches into the pressurization mode of operation with approximately 27% (determined by damper position) of the flow through the HEPA filters and charcoal adsorber banks;
 - 3) Verifying that the system maintains the control room at a positive pressure of greater than or equal to 1/8 inch Water Gauge relative to the outside atmosphere during the pressurization mode of system operation; and
 - 4) Verifying that the heaters dissipate 5 ± 1 kW when tested in accordance with ANSI N510-1980.
- f. 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 2100 cfm \pm 10%; and
- g. 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 2100 cfm \pm 10%.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 1) 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 \pm 10%;
 - 2) 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
 - 3) Verifying a system flow rate of 73,500 cfm \pm 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 \pm 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 \pm 5 kW when tested in accordance with ANSI N510-1980.
 - 4) Verifying that leakage through the Auxiliary Building Safeguards Air Filtration System Dampers M2A and M2B is less than or equal to 5 cfm when subjected to a Constant Pressure or Pressure Decay Leak Rate Test in accordance with ASME N510-1989. The test pressure for the leak rate test shall be based on a maximum operating pressure as defined in ASME N510-1989, of 8 inches water gauge.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 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 \pm 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 \pm 10%.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 80 TO FACILITY OPERATING LICENSE NO. DPR-80
AND AMENDMENT NO. 79 TO FACILITY OPERATING LICENSE NO. DPR-82
PACIFIC GAS AND ELECTRIC COMPANY
DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2
DOCKET NOS. 50-275 AND 50-323

1.0 INTRODUCTION

By letter of November 15, 1990, as supplemented June 20, 1991, October 8, 1991 and June 5, 1992, Pacific Gas and Electric Company (or the licensee) submitted a request for changes to the Technical Specifications (TS). The proposed amendments would revise the acceptance criteria for TS 4.7.6.1.b.1. This modification would change the allowable leakage past the auxiliary building safeguard air filtration system (ABSASF) dampers M2A and M2B from none when tested at 30 inches water gauge to 5 cubic feet per minute (cfm) when tested at 1.5 times the system's design operating pressure.

The June 20, 1991, letter forwarded a summary of radiological analysis performed to determine an acceptable leakage limit in support of the proposed amendment. The submittal dated October 8, 1991, contained an accident evaluation to demonstrate that with the new acceptance criteria for damper leakage, the doses from postulated accidents would remain within the NRC's acceptance criteria. In the June 5, 1992, letter the licensee clarified the proposed change to TS 4.7.6.1.b.1 to specify the test method and the test pressure. These supplemental letters provided clarifications on the safety analysis and the surveillance requirements for the proposed TS that did not change the action noticed in the Federal Register on March 6, 1991, and did not affect the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The ABSAFS at the Diablo Canyon Plant is designed to filter and adsorb any airborne radioactive material leaking from the emergency core cooling system (ECCS) equipment in the ECCS pump room areas following a design basis accident (DBA). This system may also be utilized for filtering the containment purge following a LOCA. The ABSAFS minimizes the potential impact of a radiological accident. The licensee took credit for this system in their analyses to demonstrate that the offsite doses and the doses to the control room operators were within the acceptance criteria of 10 CFR Part 100 and General Design Criteria (GDC) 19.

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The ABSAFS has two supply fans which deliver filtered and preheated air to various locations within the auxiliary building. Two exhaust fans take suction on the auxiliary building through a series of filters and discharge to the plant vent. Because the exhaust fans have a greater capacity than the supply fans, this tends to maintain the auxiliary building at a slightly negative pressure. Therefore, any building leakage tends to come from the outside into the building.

Dampers M2A and M2B are part of the safeguard exhaust duct portion of the ABSAFS. These dampers are open during the safeguards only mode and open during the building and safeguards ventilation mode when no safety injection (SI) signal is present. In the open mode, the charcoal adsorbers, which are designed to adsorb elemental iodine and methyl iodide, are bypassed. When a SI signal is present, the dampers are required to close so that the charcoal adsorbers are no longer bypassed. Leak testing of these dampers ensures that potentially contaminated air resulting from leakage during an accident is not discharged to the environment without first being passed through a charcoal adsorber.

The current TS 4.7.6.1.b.1 for the ABSAFS for Diablo Canyon Units 1 and 2 requires a surveillance test to be performed on the M2A and the M2B dampers once per 18 months or after any structural maintenance on the HEPA filter or the charcoal adsorber housing or following painting fire or chemical release in any ventilation zone communicating with the system. This surveillance requires verification that no detectable leakage occurs through these dampers when subjected to a bubble test at a pressure greater than or equal to 30 inches water gauge.

In the November 15, 1990, letter the licensee proposed that the surveillance requirement for the M2A and M2B dampers be performed on an 18-month basis and that the allowable leakage be increased from no detectable to 5 cfm. The test pressure would be changed from 30 inches water gauge to 1.5 times the system design operating pressure.

After several discussions with the staff, the licensee modified the proposed change in the June 20, 1992, letter. The June 20, 1992, letter modified the surveillance requirement such that the test method, either a constant pressure or a pressure decay test, was specified as was the test protocol, ASME N510-1989. The proposed surveillance requirement would require the test to be conducted at the maximum operating pressure as defined by ASME N510-1989, which is 8 inches water gauge for the ABSAFS.

The staff has evaluated the licensee's submittal. The staff has concluded that the change in the test frequency is appropriate because any structural maintenance on the HEPA filter or charcoal adsorber housings should not affect the ability of the dampers to maintain their integrity. The same rationale can be applied with respect to requiring a test following painting, fire, or chemical release in any ventilation zone communicating with the system. Such releases should not affect the ability of the dampers to maintain integrity. Obviously, the leakage characteristics would be required to be reestablished if work was performed on the dampers.

The staff has reviewed the licensee's proposed change in test procedure from the bubble test to the constant pressure or the pressure decay leak rate test. The staff has determined that this change in test method is appropriate since the acceptance criterion has been changed to a quantifiable value. The bubble test is not a test suitable for the quantification of leakage. The test method, ASME N510-1989, is also acceptable since it provides the latest industry knowledge and experience on damper testing.

The licensee's October 8, 1991, submittal contained the licensee's calculations to demonstrate that even with dampers M2A and M2B at a flow rate of 5 cfm total, the doses were within the limits of 10 CFR Part 100 and GDC 19. The staff independently calculated the doses to the control room operator and to offsite individuals resulting from this additional leakage to determine if the licensee still met the acceptance criteria of 10 CFR Part 100 and GDC 19. As a result of these calculations, the staff has calculated the thyroid doses from all LOCA sources to be 12 rem to the control room operator, 93 rem at the Low Population Zone (LPZ) and 195 rem at the Exclusion Area Boundary (EAB), which are within the foregoing acceptance criteria. Some of the assumptions utilized in the evaluation are included in the Table which follows.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC 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 9381). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Attachment:
Table "Assumptions Utilized in
the Determination of LOCA Doses"

Principal Contributor: J. Hayes

Date: April 1, 1993

TABLE
Assumptions Utilized in the Determination of LOCA Doses

General LOCA

1. Power level was 3580 Mwt.
2. SRPs 6.4 and 15.6.5 for the evaluation.
3. X/Q values for the EAB and LPZ were those presented in the original Diablo Canyon SER. Values for the control room operator were based upon SRP 6.4 and took into account occupancy factors and the reduction credited for dual intakes with automatic selection capability.
4. Filtration and adsorption credits for the ABSAFS and the control room system. The credited removal efficiencies for the ABSAFS were 90% for elemental and particulate forms of radioiodine and 70% for organic forms. Credited removal efficiencies were 95% for all forms of radioiodine for the control room system.
5. In addition to the 5 cfm of bypass flow past dampers M2A and M2B of the ABSAFS, bypass flow was also assumed to include the 1% of system bypass associated with the in-place freon and DOP testing required by TS for both control room and ABSAFS.
6. Unfiltered inleakage into the control room was 10 cfm.
7. Containment purges occur at 672 and 696 hours after the LOCA and are 3 hours in duration for each purge. The purge flow rate was 300 cfm.
8. Spray reduction factor was initially 10 hr^{-1} for elemental forms of radioiodine and 0.45 hr^{-1} for particulate forms. The elemental removal lasted until a DF of 200 was achieved. When a DF of 50 was achieved for particulates, the spray removal factor was reduced by a value of 10 for the remainder of the accident.
9. The unsprayed region of the containment was to be 17%.
10. Containment leak rate was 0.1% for the first 24 hours of the accident and 0.05% for the remainder of the period of the accident.
11. Control room operates with 2,100 cfm of pressurization flow being filtered and no recirculation flow filtered.

TABLE (Continued)
Assumptions Utilized in the Determination of LOCA Doses

ECCS Leakage Contribution

1. Release due to ECCS operation is directly to the environment without credit for holdup and dilution associated with the auxiliary building.
2. Filtration and adsorption credits taken for the ABSAFS.
3. At the beginning of ECCS operation (0.395 hours), a 2 gpm leak occurs and continues for the remaining period of the accident. At 24 hours after the LOCA, a 50 gpm leak occurs and lasts for 30 minutes.
4. Of the ECCS flow which leaks, 10% becomes airborne.