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PG&E Letter DCL-02-114

U.S. Nuclear Regulatory Commission
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Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Commitment Change Summary Report

Dear Commissioners and Staff:

In accordance with the Nuclear Energy Institute's (NEI) "Guideline for Managing NRC Commitments," Revision 2, endorsed by the NRC in SECY-95-300, PG&E is submitting the enclosed Commitment Change Summary Report for Diablo Canyon Power Plant, Units 1 and 2. The report provides a summary of the regulatory commitment changes that occurred during the period January 1, 2001, through December 31, 2001. The summary for each change includes identification of the source document(s), a description of the original and revised commitments, and a justification for the change.

The regulatory commitment changes described in the report were processed in accordance with the NEI guideline and were determined to not require prior NRC approval.

Sincerely,

David H. Oatley

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

Enclosure

A001

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2001, THROUGH DECEMBER 31, 2001**

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1. Voltage Based ARC – Leakage Monitoring Measures

Source Document(s): PG&E Letter DCL 97-034 dated 2/26/97

Original Commitment (T35988)

Line 3: "PWR Primary to Secondary Leak guidelines," May 1995
Line 7: "Procedure OP O-4, "dented Steam Generators." OP O-4 is in compliance with the action Level 2 plant shutdown limits in the EPRI guidelines (i.e., leakage greater than or equal to 150 gpd or leak rate increasing at greater than 60 gpd per hour)."

Revised Commitment

Line 3: "PWR Primary to Secondary Leak Guidelines," Revision 2, April 2000.
Line 6: After "Determination," add " and STP I-1B, Routine Daily checks Required by Licenses"
Line 7: Revise to: Procedure OP O-4, "Primary to Secondary Steam Generator Tube Leak Detection." OP O-4 is in compliance with the Action Levels in the EPRI guidelines."

Justification for Change

Numeric values for plant shutdown limits in OP O-4 for primary to secondary leakage are removed, and referenced to recently updated industry guidance in current EPRI report.

2. Procedural Upgrade Program

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

Original Commitment (T31394)

A significant procedural upgrade program is underway at the present time to enhance operations, maintenance, and test procedures in accordance with INPO guidelines which include human factor considerations. This is a long-term activity, but should enhance clear procedural communications. This procedural upgrade program includes the following:

- (a) Administrative Procedure E-4, "Procedures" was revised to include the significant elements of the INPO writing style guidelines.

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(b) Writing guides have been or are being developed for the following classes of procedures: operating emergency, surveillance test, maintenance, chemistry and radiation protection.

Revised Commitment

Add the following note to commitment T31394: Note 3: Paragraph (B) above references Emergency Procedures which apply to Emergency Operating and Abnormal Operating Procedures and does not apply to Emergency Planning Procedures.

Justification for Change

The context of DCL 87-136 is related to issues stemming from, "Several recent events have been identified as examples of informal or secondhand communication affecting the quality of work or operations." "A significant procedural upgrade program is underway at the present time to enhance operations, maintenance, and test procedures in accordance with INPO human factor guidelines." While Emergency Planning procedures (those required by 10CFR50 App E) were not intended to be part of these corrective actions, Emergency Planning procedures do meet the format and content requirements of procedure AD1.ID1. These procedures also meet content requirements as applicable from ANSI N18.7, Section 5.3.9.3, ANSI/ANS 3.8.3 Section 4.1, NUREG 0654, 10CFR50.47(b) and 10CFR50 Appendix E.

3. Diesel Generator Failure Reports

Source Document(s): OL1 & OL2 2.C(2); R.G. 1.108; T.S. 4.8.1.1.4

Original Commitment (T00504)

Report all Emergency Diesel Generator Failures, Valid or non-Valid, in a "Special Report" to the NRC.

Revised Commitment

Delete.

Justification for Change

The improved TS deleted Special Reporting requirements for EDG failures. The maintenance rule reporting requirement satisfies this function.

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4. APM Review of DCPD NCRs

Source Document(s): PG&E Letter DCL 89-004 dated 1/6/89

Original Commitment (T32883)

Any NCR pertaining to DCPD be reviewed and signed by an Assistant Plant Manager prior to convening a TRG.

Revised Commitment

Any NCR pertaining to DCPD be reviewed and signed by a Director prior to convening a TRG.

Justification for Change

There are no longer Assistant Plant Manager positions at DCPD. The equivalent to the old Assistant Plant Manager position is the Director.

5. SFP Pump Testing Following Part Replacement

Source Document(s): PG&E Letter DCL 87-290 dated 12/2/87,
IEB 83-05

Original Commitment (T34793)

In PG&E Letter No. DCL 87-290, the following statement is provided regarding a question about the inservice test requirements for the subject pump: "The two spent fuel pit pumps are tested quarterly under Diablo Canyon Surveillance Test Procedure P-11C, "Surveillance Test Procedure Spent Fuel Pool Pump Two and Heat Exchanger Performance Verification," to check bearing vibration, pump differential pressure, ***and bearing housing temperature***. There are no ASME Section XI Inservice Test Requirements for these two pumps. These pumps are not required to shut down the reactor to safe shutdown, maintain safe shutdown or mitigate the consequences of an accident.

Revised Commitment

It is desired to remove the test requirement for bearing housing temperature (see bolded italics in the "original commitment description" section above). This temperature data is currently taken annually using STP P-SFP-12 and STP P-SFP-22, both of which have superseded STP P-11C mentioned above.

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Justification for Change

The bearing housing temperatures have been checked and recorded annually for SFPPs 1-2 and 2-2, as required in STP P-SFP-12 and STP P-SFP-22, since 1987. SFPPs 1-2 and 2-2 both have a long history of satisfactory operation and other than establishing a "benchline operating temperature" for the bearing housings on these Hayward Tyler pumps early on, this annually collected temperature data is no longer used or needed. Since operation of these pumps began, no bearing housing temperature excursions, which might indicate a problem with the pump, have been observed. Furthermore, monitoring and trending other pump operational data, such as bearing vibration levels, pump head, and data from the PM program provides adequate indication of actual pump health and performance. Operator inspections performed during rounds and regularly conducted System Engineer walkdowns provide additional assurance that any changes in the performance of these pumps will not go undetected.

6. Precautions to Maintenance Testing on ABVS Dampers

Source Document(s): PG&E Letter DCL 89-004 dated 1/6/89

Original Commitment (T32884)

Review potential NCRs at the Plant Manager's morning meeting for assignment of responsibility for NCRs based on consideration of the department with the most responsibility for the potential corrective actions.

Revised Commitment

Responsible DCPD Director to review potential NCR for assignment of responsibility based on consideration of the group with the most responsibility for the potential corrective actions.

Justification for Change

The Department Director along with the responsible group Manager can adequately determine assignment of the NCR.

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7. Review Status of Open NCRs @ PSRC/NSOC

Source Document(s): PG&E Letter DCL 89-004 dated 1/6/89

Original Commitment (T32881)

Review status of open NCRs at a monthly Plant Staff Review Committee (PSRC) meeting to increase the awareness of DCPD and Nuclear Engineering and Construction Services (NECS) management of significant plant problems.

Revised Commitment

Review status of open NCRs on a monthly basis in a VP/Directors meeting to increase the awareness of significant plant problems to DCPD management.

Justification for Change

To utilize the time of the DCPD VP and Directors in a daily meeting once a month, rather than PSRC time which may include personnel who are not directly affected. This satisfies the intent of the commitment because the same Director's attend the VP/Directors meeting as the PSRC. In addition, the NECS department no longer exists.

8. Containment Leak Testing – Pressure Measurements

Source Document(s): STP M-7

Original Commitment (T08163)

Suitable facilities shall be provided for representative sampling of the containment air for determination of the vapor pressure. Instrumentation for this purpose shall comply with ASTM E 337-62, published by the American Society for Testing and Material, Philadelphia, Pennsylvania.

Revised Commitment

Suitable facilities shall be provided for representative sampling of the containment air for determination of the vapor pressure. Instrumentation for this purpose shall comply with ANSI/ANS 56.8-1994, published by the American Nuclear Society, 555 North Kensington Avenue, La Grange Park, Illinois, 60525, USA.

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Justification for Change

ANS 56.8-1994 specifies instrument accuracy requirements for containment integrated leakage rate testing. The original reference to ASTM E337-62 was not specific to type A tests (ILRT) nor did it specify instrument accuracy requirements.

9. Change Screen DP Limit for Unit 2

Source Document(s): LER 2-95-002-00

Original Commitment (35412)

Abnormal Operating Procedure AP-7, "Degraded Condenser" was revised to:

- A. Require Circ water pump (CWP) shutdown if screen DP exceeds 50 inches to minimize the potential damage to the CWP screens. Previously, shutdown of the CWP was required after the screens had stopped running.

Revised Commitment

- A. Require circ water pump (CWP) shutdown if screen DP exceeds **50 inches (U1) or 70 inches (U2)** to minimize the potential damage to the CWP screens. Previously, shutdown of the CWP was required after the screens had stopped running.

Justification for Change

Engineering evaluation supports a higher limit for screen differential pressure based on design changes made after the original commitment was made. These changes significantly strengthened the structure and drive mechanism of the Unit 2 traveling screens.

10. Quality Problem Status Report

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

Original Commitment (T32757)

The quality problem status reports will have the following characteristics monthly distribution:

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- Statistics on the number of NCRs, AFRs, and other department specific quality problem reports issued, closed, and open for each department.
- An aging analysis of the open NCRs, AFRs, and other department specific quality problem reports for each department.
- Identification for each department of the NCRs, AFRs, and other department specific quality problem reports that are repetitive, whose closures are late, or whose closures are deemed otherwise "critical."

Revised Commitment

Revision to second bullet as follows:

- Age of the open NCRs, AFRs, and other department specific quality problem reports for each department.

Justification for Change

The reporting of the quality problem age to plant management accomplishes the intent of an analysis.

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Table of Acronyms

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

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