

February 26, 2004

MEMORANDUM TO: Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Jack N. Donohew, Senior Project Manager, Section 2/*RA*/
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2 -
CLARIFICATION OF LICENSEE'S APPLICATION AND RESPONSE TO
NRC REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MB9476
AND MB9477)

By letter dated December 23, 2003 (DCL-03-178), Pacific Gas and Electric Company (the licensee) submitted its responses to the NRC request for additional information (RAI) dated September 25, 2003. The RAI was for the licensee's license amendment request (LAR) on Technical Specifications 3.8.1 and 3.8.4 submitted by letter dated May 29, 2003.

The NRC staff had the following questions to clarify the information provided by the licensee in its application and the RAI response:

1. The emergency diesel generator (EDG) protection in the case of loss-of-offsite power (LOOP) is discussed in the LAR application. State what is (1) the EDG protection for the EDG during EDG testing in Modes 1 and 2, when the EDG is connected to the offsite power supply (i.e., what ensures that the EDG is not damaged by the offsite power supply during this testing), and (2) the surveillance of this EDG protection, including how often the protective relay features are calibrated. The details on the EDG protection are in the LAR application.
2. For the four restrictions given below, on testing the EDG in Modes 1 and 2 connected to the offsite power supply, state if the testing restrictions discussed in the LAR application and the supplemental RAI response letter encompass the four restrictions:
 - Weather conditions will be evaluated prior to testing the EDG in Modes 1 and 2 connected to the offsite power supply and the testing would not be conducted for severe weather watches or warnings.
 - The condition of the offsite power supply will be evaluated prior to testing the EDG in Modes 1 and 2 connected to the offsite power supply and the testing would not be conducted if the offsite power supply is being challenged.

- No discretionary switchyard maintenance, including the main, auxiliary, or startup transformers, will be allowed during testing of the EDG in Modes 1 and 2 connected to the offsite power supply.
- No maintenance or testing that affects the reliability of the train associated with the EDG [not] being tested will be conducted during testing of the EDG in Modes 1 and 2 connected to the offsite power supply. If any testing or maintenance of the train must be performed at this time, then a 10 CFR 50.65(a)(4) evaluation will be performed prior to the EDG testing connected to the offsite power supply.

Attached is the licensee's e-mail providing the answers to the above questions.

The above questions were discussed with the licensee in the conference call on February 12, 2004. In that call, I stated that the reference to "the train associated with the EDG being tested" in the fourth bullet above was in fact a reference to "the train associated with the EDG not being tested."

Docket Nos. 50-275 and 50-323

Attachment: E-mail dated February 17, 2004

- No discretionary switchyard maintenance, including the main, auxiliary, or startup transformers, will be allowed during testing of the EDG in Modes 1 and 2 connected to the offsite power supply.
- No maintenance or testing that affects the reliability of the train associated with the EDG [not] being tested will be conducted during testing of the EDG in Modes 1 and 2 connected to the offsite power supply. If any testing or maintenance of the train must be performed at this time, then a 10 CFR 50.65(a)(4) evaluation will be performed prior to the EDG testing connected to the offsite power supply.

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Docket Nos. 50-275 and 50-323

Attachment: E-mail dated February 17, 2004

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ADAMS Accession No.: ML040580134

NRR-106

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DATE	2/25/04	2/25/04	02/24/2004	2/25/04

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E-MAIL DATED FEBRUARY 17, 2004

From: "Ketelsen, Stan C" <SCK3@pge.com>
To: <jnd@nrc.gov>
Date: 2/17/04 6:56PM
Subject: LAR 03-07 RAIs Response

Jack -

Attached is PG&E's response to the latest RAIs on DCPD LAR 03-07. If you have any questions, please contact me at (805) 545-4720 or Doug Spaulding at (805) 545-4540. Thanks.

Stan Ketelsen

CC: "Spaulding, Douglas", "Grozan, Thomas C"

NRC Question:

1. The EDG protection in the case of loss-of-offsite power (LOOP) is discussed in the LAR application. State what is (1) the EDG protection for the EDG during EDG testing in Modes 1 and 2, when the EDG is connected to the offsite power supply (i.e., what ensures that the EDG is not damaged by the offsite power supply during this testing) and (2) the surveillance of this EDG protection, including how often the protective relay features are calibrated. The details on the EDG protection are in the LAR application.

PG&E Response to Question 1:

As discussed in the DCL-03-061, which submitted LAR 03-07, additional protection is provided for the EDG when connected to the offsite power supply for testing. The additional protection is only permitted in the test mode to provide trip functions to protect the EDG from transients on the power supply. With this protection cut-in the diesel generator breaker will also trip under these conditions:

1. Reverse power (anti-motoring detection to protect diesel engine)
2. Loss of field (loss of or low field excitation)
3. Overcurrent (generator overload)

Prior to EDG testing, this protection is verified cut-in and there is annunciation of its position. These protective functions are tested and calibrated every 48 months.

NRC Question:

2. For the four restrictions given below, on testing the EDG in Modes 1 and 2 connected to the offsite power supply, state if the testing restrictions discussed in the LAR application and the supplemental RAI response letter encompass the four restrictions:
 - * Weather conditions will be evaluated prior to testing the EDG in Modes 1 and 2 connected to the offsite power supply and the testing would not be conducted for severe weather watches or warnings.
 - * The condition of the offsite power supply will be evaluated prior to testing the EDG in Modes 1 and 2 connected to the offsite power supply and the testing would not be conducted if the offsite power supply is being challenged.
 - * No discretionary switchyard maintenance, including the main, auxiliary, or startup transformers, will be allowed during testing of the EDG in Modes 1 and 2 connected to the offsite power supply.

- * No maintenance or testing that affects the reliability of the train associated with the EDG [not] being tested will be conducted during testing of the EDG in Modes 1 and 2 connected to the offsite power supply. If any testing or maintenance of the train must be performed at this time, then a 10 CFR 50.65(a)(4) evaluation will be performed prior to the EDG testing connected to the offsite power supply.

PG&E's Response to Question 2:

In PG&E's Letter DCL-03-178, which provided the responses to the NRC's RAI on LAR 03-07, each of the four restrictions listed above was addressed. PG&E's response to RAI Questions 1b and 1d states that no test is undertaken unless the status of the equipment being tested is known and all redundant or potentially affected equipment is in a condition that precludes unacceptable risk from performing such a test. All testing activities require determination of the status of potentially affected systems, which would include the review of external conditions or activities that could have a potential affect on risk. These external events include such things as fires, severe weather, other grid related transients or scheduled work activities. The RAI response also states that there are communication processes and agreements in place that limit risk related work in the switchyard during diesel testing.

The RAI response to Question 1d identifies administrative procedure AD7.DC8, "On-line Maintenance Risk Management." This procedure, which was provided in DCL-03-178, includes the verification procedures and processes that are followed for on-line activities including testing. The procedure provides guidance for evaluating risk in accordance with 10 CFR 50.65 (a)(4), establishing compensatory measures, and assuring the activity is scheduled appropriately.