



**Pacific Gas and  
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PG&E Letter DCL-04-022

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  
Supplement 1 to License Amendment Request 01-08  
Credit for Automatic Actuation of Pressurizer Power Operated Relief Valves

Dear Commissioners and Staff:

Pacific Gas and Electric (PG&E) Company Letter DCL-02-115, dated September 24, 2002, submitted an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 for PG&E's Diablo Canyon Power Plant Units 1 and 2, respectively. The amendment request, License Amendment Request (LAR) No. 01-08, proposed revising Technical Specification (TS) 3.4.11, "Pressurizer Power Operated Relief Valves (PORVs)," and the licensing basis to credit automatic actuation of the Class 1 PORVs, instead of the pressurizer safety valves (PSVs), to limit reactor coolant system (RCS) pressure changes for the spurious operation of the safety injection system (SIS) at power event, and other design basis accidents.

LAR 01-08 also proposed revising TS 3.4.10, "Pressurizer Safety Valves," to allow PSV loop seal temperatures to be less than the lower design temperature during plant heatup and cooldown in Mode 3, and in Mode 4 when any RCS cold leg temperature is greater than the low temperature overpressure protection arming temperature specified in the pressure temperature limits report, provided at least one Class I PORV is available and capable of providing automatic pressure relief. The loop seal revision was intended to allow gradual stabilization of the loop seal temperatures during plant heatups and cooldowns, and avoid having to partially drain the loop seals to establish the minimum design PSV inlet temperature.

Subsequent communications with the NRC staff on May 28, June 5 and October 1, 2003, documented in PG&E Letter DCL-03-152, dated November 21, 2003, and additional questions received on December 2, 2003, and January 23, 2004, indicate that PG&E will need to perform additional engineering evaluations to resolve staff questions related to PSV loop seal temperature requirements. PG&E intends to pursue resolution of the PSV loop seal issue through a separate submittal. In the meantime, PG&E withdraws the proposed TS 3.4.10 changes from LAR 01-08, and



requests the NRC staff to proceed with their review of the proposed changes to TS 3.4.11 to credit automatic actuation of the Class 1 PORVs for spurious operation of the SIS.

If you have any questions or require additional information, please contact Stan Ketelsen at (805) 545-4720.

Sincerely,

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