Pacific Gas and Electric Company

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PG&E Letter DCL-04-055

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Supporting Information for License Amendment Request (LAR) 03-07, "Revision to Technical Specifications (TS) 3.8.1 'AC Sources – Operating' & TS 3.8.4 'DC Sources – Operating' Surveillance Requirements"

Dear Commissioners and Staff:

Pacific Gas and Electric (PG&E) Letter DCL-03-061, dated May 29, 2003, transmitted an application for amendment to Facility Operating License Nos. DRP-80 and DRP-82 for the Diablo Canyon Power Plant (DCPP) Units 1 and 2, respectively. The license amendment request proposed changes to Technical Specifications (TS) 3.8.1, "AC Sources – Operating," and TS 3.8.4, "DC Sources – Operating," to allow surveillance testing of the emergency diesel generators (DGs) in operating modes in which testing is currently prohibited, and to incorporate changes based on Industry/Technical Specification Task Force (TSTF) Standard TS change TSTF-283, Revision 3. The DCPP application for amendment, along with similar applications from AmerenUE, Arizona Public Service Company, and Wolf Creek Nuclear Operating Corporation, is currently under review by the NRC staff.

On September 25, 2003, the NRC staff requested additional information concerning all four of these STARS submittals. PG&E responded to that request on December 23, 2003, (DCL-03-178). On February 4, 2004, two additional questions related to the testing of the DGs in Modes 1 and 2, with the DG connected to the offsite power supply, were provided by electronic mail from the NRC Project Manager. Responses to those questions were provided electronically on February 17, 2004. In that response, PG&E identified that the information requested was previously provided in DCL-03-061 and DCL-03-178. In further discussions, the NRC Project Manager requested that administrative controls related to the testing of the DGs in Modes 1 and 2, with the DG connected to the offsite power supply, be provided in the TS bases. This letter and enclosure provide the additional requested changes to the TS Bases for surveillance requirement (SR) 3.8.1.14.

A001

TS Bases changes are provided in Enclosure 1 (for information only) to assist the staff in its review of the proposed changes. As discussed in DCL-03-061, revision to the TS Bases will be implemented pursuant to the TS 5.5.14, TS Bases Control Program, upon approval of the license amendment.

Specifically, the information to be added to the TS Bases will state:

> "Administrative controls for performing this SR in MODES 1 or 2, with the DG paralleled to an offsite power supply, ensure or require that:
>
> a) Weather conditions are conducive to performing this SR.
>
> b) The offsite power supply and switchyard conditions support performing this SR, including communicating with the transmission group responsible for the 230 kV and 500 kV switchyards to ensure that, during the DG testing, vehicle access to these switchyards is controlled and no elective maintenance or testing on the offsite power sources is performed potentially affecting:
>
> - 230 kV and 500 kV systems. (Exceptions are to be authorized by Operations Management)
> - Either units' 12 kV startup bus
> - Transformers or insulators
>
> c) No equipment or systems assumed to be available for supporting the performance of the SR are removed from service."

DCL-03-061 also proposed changes to the Notes in SR 3.8.4.7 and SR 3.8.4.8. The proposed changes to the Notes provided the flexibility for a partial performance of the surveillance to reestablish operability following corrective maintenance. The inclusion of the changes in DCL-03-061 to the Notes was consistent with NRC approval of TSTF-283. In DCL-03-178, PG&E indicated that the changes to SR 3.8.4.7 and SR 3.8.4.8 should be processed separately based on the potential additional time to resolve the concerns both generically and for DCPP. After further review, PG&E has decided to withdraw the proposed changes to SR 3.8.4.7 and SR 3.8.4.8. PG&E will consider pursuing changes to SR 3.8.4.7 and 3.8.4.8 in the future, depending on the generic resolution of the concerns associated with the TSTF-283 related changes to SR 3.8.4.7 and SR 3.8.4.8.

This supplemental information does not affect the results of the technical evaluation and no significant hazards consideration determination previously transmitted in DCL-03-061.

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

Sincerely,

David H. Oatley
Vice President and General Manager – Diablo Canyon

dxs/4540
Enclosures
cc: Edgar Bailey, DHS
Bruce S. Mallett
David L. Proulx
Diablo Distribution
cc/enc: J. N. Donohew
Girija S. Shukla

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of PACIFIC GAS AND ELECTRIC COMPANY	)	Docket No. 50-275 Facility Operating License No. DPR-80
Diablo Canyon Power Plant Units 1 and 2	)	Docket No. 50-323 Facility Operating License No. DPR-82

AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath says that he is Vice President and General Manager – Diablo Canyon of Pacific Gas and Electric Company; that he has executed this response to the NRC request for supporting information for License Amendment Request 03-07 on behalf of said company with full power and authority to do so; that he is familiar with the content thereof; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.

David H. Oatley
Vice President and General Manager – Diablo Canyon

Subscribed and sworn to before me this 7th day of May 2004.

Notary Public
County of San Luis Obispo
State of California

SANDRA EATHERLY
Commission # 1425568
Notary Public - California
San Luis Obispo County
My Comm. Expires Jul 18, 2007

TS BASES CHANGES
(For Information Only)

NOTE: Only the TS Bases pages that are marked-up to provide the administrative controls identified in this submittal are included. The duplicate TS Bases pages in DCL-03-061 should be removed and replaced by these pages.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.14

The refueling outage intent of Regulatory Guide 1.108 (Ref. 9), paragraph 2.a.(3), requires demonstration once per 24 months that the DGs can start and run continuously at full load capability for an interval of not less than 24 hours, ≥ 2 hours of which is at a load equivalent to 110% of the continuous duty rating and the remainder of the time at a load equivalent to the continuous duty rating of the DG. The DG starts for this Surveillance can be performed either from standby or hot conditions. The provisions for prelubricating and warmup, discussed in SR 3.8.1.2, and for gradual loading, discussed in SR 3.8.1.3, are applicable to this SR.

In order to ensure that the DG is tested under load conditions that are as close to design conditions as possible, testing must be performed using a power factor of ≤ 0.87 lagging. This power factor is chosen to be representative of the actual design basis inductive loading that the DG would experience. The load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY.

Insert C

The 24 month Frequency is consistent with the intent of Regulatory Guide 1.108 (Ref. 9), paragraph 2.a.(3), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This Surveillance is modified by ~~two Notes.~~ Note 1 which states that momentary transients due to changing bus loads do not invalidate this test. Similarly, momentary power factor transients above the power factor limit will not invalidate the test. ~~The reason for Note 2 is that during operation with the reactor critical, performance of this Surveillance could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, unit safety systems. This risk compared to the risk associated with a shutdown of the unit without the availability of a required DG. The result is that this SR shall not be performed in MODE 1 or 2 unless required to demonstrate OPERABILITY following unplanned maintenance (Ref. 13).~~

~~Preplanned maintenance that would require the performance of this SR to demonstrate operability following the maintenance shall only be performed in Modes 3, 4, 5, or 6.~~

(continued)

Insert A

This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed Surveillance, a successful Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when the Surveillance is performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment.

Insert B

This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment.

Insert C

Administrative controls for performing this SR in MODES 1 or 2, with the DG paralleled to an offsite power supply, ensure or require that:

a. Weather conditions are conducive to performing this SR.

b. The offsite power supply and switchyard conditions support performing this SR, including communicating with the transmission group responsible for the 230 kV and 500 kV switchyards to ensure that, during the DG testing, vehicle access to these switchyards is controlled and no elective maintenance or testing on the offsite power sources is performed potentially affecting:

- 230 kV and 500 kV systems. (Exceptions are to be authorized by Operations Management)
- either units' 12 kV startup bus

- transformers or insulators

c. No equipment or systems assumed to be available for supporting the performance of the SR are removed from service.