



*Pacific Gas and
Electric Company*

David H. Oatley
Vice President and
General Manager

Diablo Canyon Power Plant
P.O. Box 56
Avila Beach, CA 93424

805.545.4350
Fax: 805.545.4234

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PG&E Letter DCL-04-067

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, January 1, 2003, through
December 31, 2003

Dear Commissioners and Staff:

In accordance with NEI 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0, endorsed by the NRC in SECY-00-0045, Pacific Gas and Electric Company 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 of January 1, 2003, through December 31, 2003. 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

smg/4692/R0250474

Enclosure

cc: Bruce S. Mallett
David L. Proulx
Girija S. Shukla
Diablo Distribution

1001

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

Table of Contents

<u>Commitment</u>	<u>Page</u>
1. Final Safety Analysis Report (FSAR) Update Review, Accountability, and Responsibility	2
2. Fuel Tracking Software	5
3. Incorporation of "On-the-Spot Changes" (OTSCs) into Procedures	6
4. Plant Staff Review Committee (PSRC) Review of Performance Indicator Trends	7
5. PSRC Timely Review of OTSCs	8
6. Fire Barrier Impairments – Reporting and Control	10

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

1. FSAR Update Review, Accountability, and Responsibility

Source Documents

1. PG&E Letter DCL-96-160, "Cause and Corrective Actions – Supplemental Response to NRC Inspection Report 96-06, Request for Information Related to the FSAR Review Efforts and Results"
2. NRC Inspection Report 96-06

Original Commitment (T35518)

"Procedure XI3.ID2, 'FSAR Update Revision and Maintenance,' will be revised to include the following:

- A requirement for [Nuclear Power Generation] NPG Licensing to perform a comprehensive review of the entire FSAR Update by diverse groups of knowledgeable [Pacific Gas and Electric Company] PG&E personnel every fifth revision cycle; i.e., before issuance of Revisions 11, 16, 21, etc. This review would be solely for the purpose of improving accuracy and readability, and would be similar in scope to that just completed for Revision 11 by design engineers, system engineers, and operations personnel.
- A clear statement of 'ownership' and accountability for each section of the FSAR Update.
- A requirement for NPG Licensing to notify lead organizations no later than 6 months into each FSAR Update revision cycle of their responsibilities regarding review of assigned sections and initiation of appropriate change requests.
- A requirement to provide training to appropriate management and engineering personnel at least once each revision cycle on procedures and electronic databases related to the FSAR Update.
- A requirement for NPG management to communicate expectations to all NPG engineers at least once each revision cycle regarding FSAR Update accuracy and accountability."

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

Revised Commitment

Procedure XI3.ID2, "FSAR Update Revision and Maintenance," will include the following:

- A requirement for licensing to perform a comprehensive review of the entire FSAR Update by diverse groups of knowledgeable PG&E personnel every fifth revision cycle; i.e., before issuance of Revisions 11, 16, 21, etc. This review would be solely for the purpose of improving accuracy and readability, by design engineers, system engineers, and operations personnel.
- A clear statement of "ownership" and accountability for each section of the FSAR Update.

Justification for Change

The original commitments involved notifying and training those utilizing the FSAR Update change process, communicating management expectations regarding FSAR Update accuracy and accountability, and communicating lead organization responsibilities regarding review of assigned sections and initiation of appropriate change requests. These commitments were made in 1996, and since then a number of improvements have been made such that the commitments are no longer needed. These include:

- Individuals proposing to make changes to the FSAR Update are required to evaluate the proposed changes using the criteria set forth in 10 CFR 50.59. PG&E requires Licensing Basis Impact Evaluation (LBIE) Screen preparers and independent technical reviewers (ITRs) to successfully complete LBIE training. LBIE Screen preparers are also required to have a working knowledge of the FSAR Update. Procedure XI3.ID2 provides the individual proposing an FSAR Update change with guidelines for when the 50.59 process must be used. LBIE training is a vehicle where responsibilities and expectations regarding the FSAR Update are communicated.

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

- In 1999, the FSAR Update process was relocated from the PG&E General Office to Diablo Canyon Power Plant (DCPP). This move allowed the engineering organization and the FSAR Update process owner to communicate directly, as needed, to respond to FSAR Update questions, and resolve FSAR Update accuracy and accountability issues.
- Trend records are generated for low-level problems identified with the FSAR Update process. When the FSAR Update process owner detects an adverse trend, responsible lead organizations are promptly notified of the trend and expectations and responsibilities are emphasized to improve performance.
- XI3.ID2 already contains a clear statement of lead organization responsibilities for ownership and accountability. When necessary, the FSAR Update process owner reinforces the responsibilities and expectations on a real-time basis.

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

2. Fuel Tracking Software

Source Document

PG&E Letter DCL-02-136, "Licensee Event Report 1-2002-006, Technical Specification LCO 3.7.17.2 Not Met During the 1R11 Refueling Outage When Two Fuel Assemblies Were Placed in Adjacent Locations"

Original Commitment (T35052)

"PG&E will use a new fuel-tracking software program to help plan fuel movements. Use of this program will provide warnings of planned moves that would be in violation of TS requirements."

Revised Commitment

PG&E will use a new fuel-tracking software program to help plan major fuel movements (i.e., core offload, core reload, new fuel receipt, and spent fuel pool consolidations). Use of this program will provide warning of planned moves that would be in violation of Technical Specification (TS) requirements.

Justification for Change

The original commitment was made as a result of a fuel assembly that was stored in the spent fuel pool in violation of the TS, and was noticed when the TracWorks software program identified a past improper fuel move.

At times, minor fuel movement changes (deviations) are necessary, and the controls for handling these movements are specified in the procedure controlling the evolution. In these instances, verification with TracWorks is unduly burdensome and unnecessary, as these planned moves are limited in number, controlled by procedure, and require concurrence by a licensed Senior Reactor Operator (SRO) and Reactor Engineering.

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

3. Incorporation of OTSCs into Procedures

Source Document

PG&E Letter DCL-84-321, "Response to IEIR 50-275/84-21 – Notice Of Violation"

Original Commitment (T30850)

"To prevent similar events, such as the use of improper sequences or omissions of steps, the administrative procedure which governs OTSCs, AP E-4S4, 'Issuance And Approval of On-The-Spot Procedure Changes' was revised to require that the changes be incorporated in the actual text of the procedure within 14 days. An aggressive program has been initiated to incorporate existing OTSCs into the associated procedures."

Revised Commitment

1. Following authorization, pen-and-ink changes to procedures (OTSCs) shall be distributed to controlled manuals requiring immediate distribution.
2. When filing OTSCs, marked-up pages shall be integrated into the procedure such that revised steps are apparent to users.
3. As part of the issued-for-use process, the existence of any OTSC against the procedure shall be determined. All OTSCs shall be included with the procedure when it is issued for use.

Justification for Change

The revised commitment meets the intent of the original commitment, in that it ensures procedure changes made using OTSCs are not overlooked or omitted during procedure performance. To account for the elimination of the 14-day incorporation period, the requirement to determine if any OTSCs are written against the procedure is invoked, as part of the issued-for-use process prior to using a procedure to perform physical work.

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

4. PSRC Review of Performance Indicator Trends

Source Document(s)

PG&E Letter DCL-87-136, "PG&E Management Actions to Maintain the High Level of Performance at DCP"

Original Commitment (T31499)

"...the PSRC will continue to perform quarterly reviews of the performance indicator trends and will focus on specific areas where additional actions may be needed."

Revised Commitment

The quality director will provide a monthly report to management that includes an assessment of the overall health of the Problem Prevention and Resolution Program (PPR Health Report). Directors will review the performance indicators in the monthly PPR report to identify areas requiring management attention (e.g., corrective action timeliness, adverse trends, human performance).

Justification for Change

The original commitment no longer reflects PG&E's business practices. The scope of the PPR Health Report includes organizational improvement, the Corrective Action Program, the Operating Experience and Assessment Program, and the Employee Concerns Program. It is reviewed monthly rather than quarterly and provides more effective and timely management involvement in the PPR processes.

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

5. PSRC Timely Review of OTSCs

Source Document

PG&E Letter DCL-85-290, "Licensee Event Report 1-85-024, Temporary Changes to Procedures Not Reviewed By Plant Staff Review Committee Within 14 Days"

Original Commitment (T32153)

"To prevent recurrence, the following actions have been taken: (1) Administrative Procedure E-4S4, 'Issuance and Approval of On-The-Spot Changes to Procedures,' has been revised to more clearly delineate the processing steps and reference back to the procedure, although the previous revision would have been adequate for processing OTSCs if it had been followed, (2) clerical personnel will be trained in the proper processing and filing responsibilities of Administrative Procedure E-4S4 by September 30, 1985, and (3) because the OTSC review also found materials in the plant manuals that were not identified on the list of effective procedures used for the review, the document review instructions have been amended to ensure that all discrepancies, including additional material, within a controlled volume are identified to the Document Control Department immediately."

Revised Commitment

To prevent recurrence (i.e., OTSCs not being reviewed by the PSRC in the 14-day time limit of TS 6.8.3), the following actions have been taken:

1. The OTSC form shall describe the OTSC processing steps, including the requirement to deliver effective OTSCs to the procedure group or other designated locations.
2. The process for auditing controlled manuals shall include instructions to check for, and remove extraneous, superseded, or obsolete material.

Justification for Change

The original commitment was made to ensure OTSCs were routed to the approving authority and approved within 14 days, and to ensure that extraneous material, such as superseded or obsolete procedures,

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

unapproved documents, or unrelated information was not kept in controlled manuals. This revision adds clarity and does not change the intent of the original commitment

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

6. Fire Barrier Impairments – Reporting and Control

Source Document

PG&E Letter DCL-91-249, "Licensee Event Report 1-91-015-00, Violation of Technical Specification 3.7.10 When an Hourly Fire Watch Patrol Was Not Performed Due to Inadequate Instructions"

Original Commitment (T34812)

Written instructions have been added to the fire watch round status logsheets stating (1) the hourly roving fire watch should first contact the senior fire watch on site when a problem arises that may delay the hourly fire watch patrol; (2) the senior fire watch on site will arrange to have a relief individual perform a partial or complete TS impairment inspection; (3) if a relief individual is not available, the senior fire watch on site shall contact the Shift Foreman and request an inspection of the TS-related fire barrier impairments by Operations shift personnel or by the shift industrial fire officer; and (4) if the senior fire watch cannot be contacted in a timely manner, the fire watch may call the Shift Foreman directly.

Revised Commitment

Fire watch is responsible for notifying the fire watch supervisor and requesting assistance if a delay is anticipated that would cause a missed rove. The fire watch supervisor is responsible for contacting the shift foreman to request assistance if a delay is anticipated that would cause a missed rove, or if the assigned group cannot support the rove.

Justification for Change

PG&E made the original commitment in a licensee event report when the hourly roving fire watch was unable to exit the radiological control area and the fire watch rounds were not completed within the hour, as required by Technical Specification 3.7.10, "Fire Barrier Penetrations."

The intent of the original commitment was to describe the actions the fire watch personnel should take when unable to complete their rounds within the one-hour period, not to increase the scope of the hourly fire watch patrols to inspect impaired fire barriers (e.g., penetration seals, doors, dampers, etc.). Equipment Control Guideline 18.7, "Fire Rated Assemblies," which replaced TS 3.7.10, states the requirements for

**COMMITMENT CHANGE SUMMARY REPORT
JANUARY 1, 2003, THROUGH DECEMBER 31, 2003**

establishing hourly fire watch patrols, but does not contain requirements to perform inspections of impaired fire barriers. The role of the hourly fire watch is to conduct a tour of the affected fire area where the impairments are contained, not to physically inspect the impairments during the course of their fire watch rounds.