



**Pacific Gas and  
Electric Company**

**David H. Oatley**  
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November 1, 2004

PG&E Letter DCL-04-123

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

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
License Amendment Request 04-06  
Removal of Technical Specifications 5.6.1, "Occupational Radiation Exposure  
Report," and 5.6.4, "Monthly Operating Reports"

Dear Commissioners and Staff:

In accordance with 10 CFR 50.90, enclosed is an application for amendment to Facility Operation License Nos. DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant, respectively. The proposed amendment would delete the Technical Specification (TS) requirements to submit Monthly Operating Reports and Occupational Radiation Exposure Reports.

The proposed TS changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process.

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Enclosure 2 provides the existing TS pages marked-up to show the proposed change. Enclosure 3 provides retyped (clean) TS pages.

Pacific Gas & Electric Company (PG&E) requests approval of the proposed license amendment request no later than November 1, 2005. The changes proposed are not required to address an immediate safety concern. PG&E requests the license amendment, effective upon NRC issuance, be implemented within 60 days from the date of issuance.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'D H Oatley', written in a cursive style.

David H. Oatley  
*Vice President and General Manager*

embh/3664

Enclosures

cc: Edgar Bailey, DHS  
Bruce S. Mallett  
David L. Proulx  
Diablo Distribution

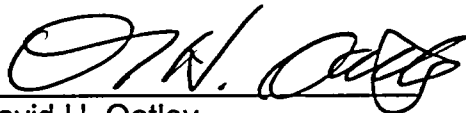
cc/enc: Girija S. Shukla

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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

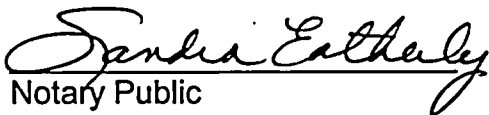
AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath says that he is Vice President and General Manager of Pacific Gas and Electric Company; that he has executed license amendment request 04-06 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.

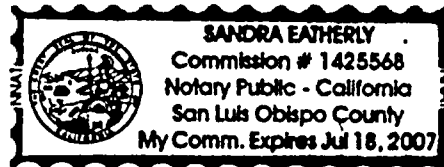


David H. Oatley  
*Vice President and General Manager*

Subscribed and sworn to before me this 1<sup>st</sup> day of November 2004.



Notary Public  
County of San Luis Obispo  
State of California



## EVALUATION

### 1.0 DESCRIPTION

The proposed amendment deletes the requirements in Technical Specification (TS) 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIP).

### 2.0 PROPOSED CHANGE

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 5.6.1	Occupational Radiation Exposure Report	Deleted
TS 5.6.4	Monthly Operating Reports	Deleted

Pacific Gas & Electric Company (PG&E) is proposing not to renumber the Specifications in Section 5.6 as proposed in TSTF-369, Revision 1, but instead to designate TS Sections 5.6.1 and 5.6.4 as "Not Used". This is consistent with the manner in which the current Diablo Canyon Power Plant (DCPP) Technical Specifications have been formatted for other reports that are not used (e.g., TS 5.6.7 and TS 5.6.9). Renumbering of the TS in Section 5.6 would result in additional unnecessary procedure changes.

### 3.0 BACKGROUND

The background for this application is addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067), and TSTF-369, Revision 1.

### 4.0 TECHNICAL ANALYSIS

PG&E has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067), as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the information provided to support

TSTF-369, Revision 1. PG&E has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to the DCPD Units 1 and 2, and justify this amendment for the incorporation of the changes to the DCPD TS.

The exception to TSTF-369, Revision 1, to designate TS Sections 5.6.1 and 5.6.4 as "Not Used" instead of renumbering the TS in Section 5.6, is editorial only, does not revise substantive technical or administrative requirements, and does not adversely affect the NRC staff's model SE for the TSTF-369, Revision 1, changes.

## **5.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067), and TSTF-369, Revision 1.

### **5.1 NO SIGNIFICANT HAZARDS CONSIDERATION**

PG&E has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067), as part of the CLIIP. PG&E has concluded that the proposed determination presented in the notice is applicable to DCPD and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

### **5.2 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA**

The applicable regulatory requirements and guidance associated with this application are addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067), and TSTF-369, Revision 1.

### **5.3 VERIFICATION AND COMMITMENTS**

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067), for this TS improvement, PG&E makes the following verifications and regulatory commitments:

1. PG&E makes a regulatory commitment to provide to the NRC, using an industry database, the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being maintained by the Institute of Nuclear Power Operations).

2. DCPD does not have different reactor types or both operating and shutdown reactors.

## 6.0 ENVIRONMENTAL CONSIDERATION

PG&E has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067), as part of the CLIP. PG&E has concluded that the staff's findings presented in that evaluation are applicable to DCPD and the evaluation is hereby incorporated by reference for this application.

## 7.0 REFERENCES

### 7.1 REFERENCES

1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement To Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).
2. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1.

### 7.2 PRECEDENT

This application is being made in accordance with the CLIP. PG&E is not proposing variations or deviations from the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

Proposed Technical Specification Changes (markup)

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1

Occupational Radiation Exposure Report

Not Used

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermo luminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in a format similar to the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

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5.6 Reporting Requirements (continued)

5.6.3 Radioactive Effluent Release Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Not Used

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Shutdown Bank Insertion Limits for Specification 3.1.5,
  2. Control Bank Insertion Limits for Specification 3.1.6,
  3. Axial Flux Difference for Specification 3.2.3,
  4. Heat Flux Hot Channel Factor,  $K(Z)$  and  $W(Z) - F_{\alpha}(z)$  ( $F_{\alpha}^{RTP}$  Specification 3.2.1),
  5. RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor -  $F_{\Delta H}^N$  ( $F_{\Delta H}^{RTP}$  and  $PF_{\Delta H}$  for Specification 3.2.2),
  6. SHUTDOWN MARGIN values in Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6, and 3.1.8,
  7. Moderator Temperature Coefficient limits in Specification 3.1.3, and
  8. Refueling Boron Concentration limits in Specification 3.9.1.

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Proposed Technical Specification Changes (retyped)

Remove Page

5.0-25  
5.0-26

Insert Page

5.0-25  
5.0-26

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Not Used

5.6.2 Annual Radiological Environmental Operating Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

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The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in a format similar to the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

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5.6 Reporting Requirements (continued)

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The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Not Used

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Shutdown Bank Insertion Limits for Specification 3.1.5,
  2. Control Bank Insertion Limits for Specification 3.1.6,
  3. Axial Flux Difference for Specification 3.2.3,
  4. Heat Flux Hot Channel Factor,  $K(Z)$  and  $W(Z) - F_{\alpha}(z)$  ( $F_{\alpha}^{RTP}$  Specification 3.2.1),
  5. RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor -  $F_{\Delta H}^N$  ( $F_{\Delta H}^{RTP}$  and  $PF_{\Delta H}$  for Specification 3.2.2),
  6. SHUTDOWN MARGIN values in Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6, and 3.1.8,
  7. Moderator Temperature Coefficient limits in Specification 3.1.3, and
  8. Refueling Boron Concentration limits in Specification 3.9.1.

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