Pacific Gas and
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PG&E Letter DCL-04-170

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
Response to NRC Request for Additional Information Regarding License Amendment Request 03-17, Common STARS License Amendment, Implementation of WCAP-14333 and WCAP-15376, RTS and ESFAS Test Times, Completion Times, and Surveillance Test Intervals

Dear Commissioners and Staff:

Pacific Gas and Electric Company (PG&E) Letter DCL-04-013, "License Amendment Request 03-17, Common STARS License Amendment, Implementation of WCAP-14333 and WCAP-15376, RTS and ESFAS Test Times, Completion Times, and Surveillance Test Intervals," dated February 13, 2004, transmitted an application to amend Facility Operating License Nos. DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant, respectively. The proposed license amendment request (LAR) would revise Technical Specification (TS) 3.3.1, Reactor Trip System (RTS) Instrumentation, TS 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation, and TS 3.3.6, Containment Ventilation Isolation Instrumentation, to adopt completion time, test bypass time, and surveillance frequency changes approved by the NRC in WCAP-14333-P-A, Revision 1, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times," dated October 1998, and WCAP-15376-P-A, Revision 1, "Risk-Informed Assessment of the RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," dated March 2003.

PG&E submitted the referenced license amendment application in conjunction with an industry consortium of plants as a result of a mutual agreement known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of plants operated by AmerenUE, TXU Power, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, and Arizona Public Services Company.

During the NRC review of the Callaway Plant license amendment request, a number of questions were raised and responded to electronically by AmerenUE.

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After further review of this information, on October 19, 2004, the NRC staff requested that certain information be provided formally to support the amendment application. This additional information does not impact the conclusion of the no significant hazards consideration determination or the results of the technical and regulatory analyses previously transmitted in PG&E Letter DCL-04-013. There are no commitments associated with this submittal.

PG&E requests that the implementation time be revised to within 180 days from the date of issuance in order to coordinate required procedure revisions with other planned changes.

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

mjr/4557
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

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 additional information regarding License Amendment Request 03-17 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 10th day of December 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

Request for Additional Information for License Amendment Request (LAR) 03-17

Pacific Gas and Electric Company (PG&E) Letter DCL-04-013, "License Amendment Request 03-17, Common STARS License Amendment, Implementation of WCAP-14333 and WCAP-15376, RTS and ESFAS Test Times, Completion Times, and Surveillance Test Intervals," dated February 13, 2004, transmitted a LAR involving changes to Technical Specifications (TS) 3.3.1, "Reactor Trip System (RTS) Instrumentation," and 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," to implement Westinghouse WCAP-14333-P-A, Revision 1, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times," dated October 1998, and WCAP-15376-P-A, Revision 1, "Risk-Informed Assessment of the RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," dated March 2003. The NRC approved these WCAPs for application to individual plant TSs, and the licensees have requested to incorporate these WCAPs in their plant TSs.

As explained in the application, PG&E submitted its license amendment application in conjunction with an industry consortium of plants as a result of a mutual agreement known as Strategic Teaming and Resource Sharing (STARS). The licensees' plants and the plant-specific application dates are the following:

Callaway Plant	December 17, 2003 (ULNRC-04929)
Comanche Peak, Units 1 and 2	January 21, 2004 (TXX-03187)
Diablo Canyon, Units 1 and 2	February 13, 2004 (DCL-04-013)
Wolf Creek Station	December 15, 2003 (WO 03-0059)

The Callaway Plant is the lead plant for the proposed amendments and the other licensees, including PG&E, submitted similar LARs in that all the applications are in the same format with the plant-specific information shown in brackets (i.e., within [.....]).

Because the WCAPs have been approved by the NRC for application to plant TSs and there was uncertainty that the technical branches could complete the reviews within the time requested by the licensees, the lead project manager for the joint applications decided to review the applications and then have the technical branches review the safety evaluations and concur on the amendments. For efficiency, the review of the applications is being done in two parts: (1) review the application for Callaway, the lead plant, in detail, for the basis for the proposed changes to the TSs, and (2) review the plant-specific information in detail in the remaining applications.

The review has been conducted over a period starting January 2004. Several review questions were transmitted to AmerenUE, in order to clarify the statements in the Callaway application, by sending emails to the licensee from March 30 to April 28, 2004, and a meeting was conducted on March 23, 2004. The summary of the meeting was issued on April 2, 2004. Of the questions sent to the licensee, the following are applicable to the Diablo Canyon Power Plant.

NRC Question 1:

In the discussion of Tier 2 restrictions in WCAP-14333 (above the four bullets listed on page 11 in Section 4 of Enclosure 1 of the application, it is stated that to meet the WCAP-14333 Safety Evaluation (SE) Condition to include Tier 2 insights into the decision-making process before taking equipment out-of-service, there will be restrictions on concurrent removal of certain equipment when a logic train is inoperable for maintenance; however, this restriction would not be applied when a logic train is being tested under the existing 4-hour bypass Notes in TSs 3.3.1 Condition Q, 3.3.2 Condition C, or 3.3.2 Condition G which allow one train to be bypassed for up to 4 hours for surveillance testing provided the other train is operable.

Is the reason that the restriction on concurrent removal of certain equipment when a logic train is inoperable for maintenance does not apply to the 4-hour bypass Notes of the Conditions Q, C, and G stated in the paragraph or is it because the 4-hour bypass time is such a short time?

PG&E Response:

The reason this restriction does not apply during logic surveillance testing is tied to the nature of the requested changes in the amendment. Tier 2 restrictions for Regulatory Guides 1.174 and 1.177 apply only to risk-informed TS changes. PG&E is not requesting any changes to the 4-hour surveillance bypass Notes in these three TS Conditions. Since these current licensing basis TS Condition Notes remain unchanged, there is no reason to apply Tier 2 restrictions to them. The fact that the surveillance testing bypass allowance is short, only serves to further reinforce the position that the Tier 2 restrictions should not come into play during logic surveillance testing.

NRC Question 2:

Confirm whether the following is a correct characterization of the discussion on TSs 3.3.1 Condition Q, 3.3.2 Condition C, and 3.3.2 Condition G in the paragraph before the four bullets referenced in the previous question:

The licensee stated that the restrictions in the four bullets would not be applied when a logic train is being tested under the existing Notes in TSs 3.3.1 Condition Q, 3.3.2 Condition C, and 3.3.2 Condition G, which allow one train to be bypassed for up to 4 hours for surveillance testing provided the other train is operable. In other words, as long as the inoperable train is inoperable only because of surveillance testing and only for up to 4 hours, the above restrictions would not be applied to prevent the surveillance testing of the train. This is because the inoperable train is only being considered inoperable because of the surveillance testing. The licensee further stated that, because these three TS Conditions are typically entered due to equipment failure and are unplanned entries versus planning to take the equipment out of service for maintenance, it follows that some of the Tier 2 restrictions may not be met at the time of

entry into any of these TS Conditions for equipment failure. If this situation were to occur (i.e., a train becomes inoperable because of equipment failure), the Tier 3 Configuration Risk Management Program (CRMP) will assess the emergent condition during the proposed extended 24-hour Completion Time (CT) to restore the inoperable train to operable status and decide from a risk management perspective to (1) restore the inoperable logic train and exit the TS Condition, (2) fully implement the Tier 2 restrictions (i.e., the four bullets), or (3) shut the plant down.

Therefore, could the CRMP decide to shut down the plant sooner than required by any of the three conditions?

PG&E Response:

The following response repeats back the characterization above, with the necessary changes in bold, italicized print.

"The licensee stated that the restrictions in the four bullets on page 11 of Enclosure 1 would not be applied when a logic train is being tested under the existing Notes in TS 3.3.1 Condition Q, TS 3.3.2 Condition C, and TS 3.3.2 Condition G, which allow one train to be bypassed for up to 4 hours for surveillance testing provided the other train is operable. In other words, as long as the inoperable train is inoperable only because of surveillance testing and only for up to 4 hours, the above restrictions would not be applied to ***implement risk-based compensatory measures.*** This is because the inoperable train is only being considered inoperable because of the surveillance testing ***and the current licensing basis (CLB) already includes the 4-hour bypass testing allowance.*** The licensee further stated that, because these three TS Conditions are typically entered due to equipment failure and are unplanned entries versus planning to take the equipment out of service for maintenance, it follows that some of the Tier 2 restrictions may not be met at the time of entry into any of these TS Conditions for equipment failure. If this situation were to occur (i.e., a train becomes inoperable because of equipment failure), the Tier 3 Configuration Risk Management Program (CRMP) will assess the emergent condition during the proposed extended 24-hour CT to restore the inoperable train to operable status and decide from a risk management perspective to (1) restore the inoperable logic train and exit the TS Condition, or (2) implement the Tier 2 restrictions (i.e., the four bullets). ***The CRMP does not have requirements for a plant shutdown. However, the risk, as assessed by the CRMP, would be a factor in deciding to shut down the plant sooner than required by the proposed 24-hour Completion Time in any of the three TS Conditions.***

NRC Question 3:

It appears when you are in the test bypass time of the Notes in TSs 3.3.1 Condition Q, 3.3.2 Condition C, and 3.3.2 Condition G, that the plant is in non-risk informed space and, therefore, Tier 2 requirements do not apply. However, because (1) Tier 2 is the avoidance of risk-significant plant-specific configurations by considering potential risk-significant plant operating conditions and addressing the need to preclude potentially

Should the word "logic" be added to the first reference to a complete train in the quoted sentence so that the sentence states "one complete logic train of a function that supports a complete train of a function noted above must be available"?

PG&E Response:

The quoted sentence means the following (bold italics emphasize difference from above characterization): "***At least one complete support system train, of the support systems listed in the fourth bullet,*** that supports a function noted in the first three bullets (e.g., AFW system, RCS pressure relief ***from the PORVs and safety valves, AMSAC, turbine trip, ECCS, SSPS master and slave relays, and channels in the Eagle 21 Process Protection System or Nuclear Instrumentation System***) listed on pages 11 and 12 of Enclosure 1 must be available." The quoted sentence in NRC Question 4 above was taken directly from Vogtle's license amendment request.

The first reference to "one complete train" in the quoted sentence covers only the support systems listed in the fourth bullet on page 12. As a practical application example, the quoted sentence requires that at least one complete cooling train (auxiliary salt water and component cooling water) be available to support AFW flow delivery.