



**Pacific Gas and
Electric Company®**

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October 19, 2005

PG&E Letter DCL-05-120

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 05-05

Application for Technical Specification Change to Add LCO 3.0.8 on the
Inoperability of Snubbers Using the Consolidated Line Item Improvement Process

Dear Commissioners and Staff:

In accordance with 10 CFR 50.90, enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant (DCPP), respectively. The enclosed license amendment request (LAR) proposes to modify technical specification (TS) requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8. The changes are consistent with Nuclear Regulatory Commission approved Industry/Technical Specification Task Force (TSTF), Standard Technical Specifications (STS) change TSTF-372, Revision 4.

Enclosure 1 contains a description of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Enclosures 2 and 3 contain marked-up and retyped (clean) TS pages, respectively. Enclosure 4 provides the marked-up TS Bases changes for information only. TS Bases changes are provided for information only and will be implemented pursuant to TS 5.5.14, "Technical Specifications Bases Control Program," at the time this amendment is implemented.

Pacific Gas and Electric (PG&E) requests approval of the proposed license amendment by October 19, 2006, with the amendment being implemented within 90 days.

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

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Sincerely,

A handwritten signature in black ink, appearing to read 'D. H. Oatley'.

David H. Oatley
Vice President and General Manager

mdw/4877
Enclosures

cc: Edgar Bailey, DHS
Terry W. Jackson
Bruce S. Mallett
Diablo Distribution
cc/enc: Girija S. Shukla

EVALUATION

1.0 DESCRIPTION

The proposed amendment would modify technical specifications (TS) requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8.

The availability of this TS improvement was published in the *Federal Register* on May 4, 2005 (70 FR 23252), as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Pacific Gas and Electric (PG&E) has reviewed the safety evaluation dated May 4, 2005, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support Technical Specification Task Force (TSTF)-372. PG&E has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Diablo Canyon Power Plant (DCPP), Units 1 and 2, and justify this amendment request for the incorporation of the changes to the DCPP TS.

2.2 Optional Changes and Variations

PG&E is not proposing any variations or deviations from the TS changes described in the TSTF-372, Revision 4 or the NRC staff's model safety evaluation dated May 4, 2005.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

PG&E has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the *Federal Register* as part of the CLIIP. PG&E has concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to DCPP and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on May 4, 2005, for this TS improvement, plant-specific verifications were performed as follows:

PG&E has established TS Bases for LCO 3.0.8 which provide guidance and details on how to implement the new requirements. LCO 3.0.8 requires that risk be managed and assessed. The Bases also state that while the Industry and NRC guidance on implementation of 10 CFR 50.65(a)(4), the Maintenance Rule, does not address seismic risk, LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment required by LCO 3.0.8 need not be quantified, but may be a qualitative assessment of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function. Finally, PG&E has a Bases Control Program consistent with Section 5.5 of the Standard Technical Specifications.

4.0 ENVIRONMENTAL EVALUATION

PG&E has reviewed the environmental evaluation included in the model safety evaluation dated May 4, 2005, as part of the CLIP. PG&E has concluded that the staff's findings presented in that evaluation are applicable to DCCP and the evaluation is hereby incorporated by reference for this application.

Proposed Technical Specification Changes (marked-up)

, and LCO
3.0.8.

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1	LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, and LCO 3.0.7.
LCO 3.0.2	<p>Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.</p> <p>If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.</p>
LCO 3.0.3	<p>When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:</p> <ul style="list-style-type: none">a. MODE 3 within 7 hours;b. MODE 4 within 13 hours; andc. MODE 5 within 37 hours. <p>Exceptions to this Specification are stated in the individual Specifications.</p> <p>Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.</p> <p>LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.</p>
LCO 3.0.4	<p>When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:</p> <ul style="list-style-type: none">a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, orc. When an allowance is stated in the individual value, parameter, or other Specification. <p>This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.</p>

(continued)

3.0 LCO APPLICABILITY (continued)

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Test Exception LCO 3.1.8, allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

Insert 1

Technical Specification Inserts

Insert 1

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected support system LCO(s) shall be declared not met.

Proposed Technical Specification Changes (retyped)

Remove Page

3.0-1
3.0-2

Insert Page

3.0-1
3.0-2

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1	LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8.
LCO 3.0.2	<p>Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.</p> <p>If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.</p>
LCO 3.0.3	<p>When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:</p> <ol style="list-style-type: none"> a. MODE 3 within 7 hours; b. MODE 4 within 13 hours; and c. MODE 5 within 37 hours. <p>Exceptions to this Specification are stated in the individual Specifications.</p> <p>Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.</p> <p>LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.</p>
LCO 3.0.4	<p>When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:</p> <ol style="list-style-type: none"> a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or c. When an allowance is stated in the individual value, parameter, or other Specification. <p>This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.</p>

(continued)

3.0 LCO APPLICABILITY (continued)

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Test Exception LCO 3.1.8, allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- a. The snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. The snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected support system LCO(s) shall be declared not met.

**Changes to Technical Specification Bases Pages
(For information only)**

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.68 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	<p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:</p> <ol style="list-style-type: none"> a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. <p>There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.</p> <p>Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.</p> <p>The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be</p>

(continued)

BASES

LCO 3.0.7
(continued)

be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

Insert 1



Technical Specification Bases Inserts

Insert 1

LCO 3.0.8

LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

If allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

Technical Specification Bases Inserts

Insert 1 (continued)

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.