Pacific Gas and Electric Company®

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PG&E Letter DCL-05-124

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 Request for Additional Information Regarding License Amendment Request 04-05, "Revision to Technical Specification (TS) Requirements for Handling Irradiated Fuel in the Primary Containment and the Fuel Handling Building and Selected Specifications Associated with Performing Core Alterations"

Dear Commissioners and Staff:

Pacific Gas and Electric (PG&E) Letter DCL-04-131, dated October 29, 2004, submitted License Amendment Request (LAR) 04-05, "Revision to Technical Specification (TS) Requirements for Handling Irradiated Fuel in the Primary Containment and the Fuel Handling Building and Selected Specifications Associated with Performing Core Alterations," to revise the TS requirements for handling of irradiated fuel in the containment and fuel handling building, and certain specifications related to performing core alterations. The proposed changes to the TS are consistent with the NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications Change Traveler TSTF-51, Revision 2, "Revise containment requirements during handling irradiated fuel and core alterations."

Enclosure 1 provides additional information required by the NRC staff to complete its review of LAR 04-05. It relates to the capability to filter and monitor any radioactive releases in the event of a fueling handling accident to reduce doses even further beyond that provided by natural decay. This information has been discussed with the staff.

The information provided in this submittal does not affect the results of the technical evaluation or the no significant hazards consideration determination previously transmitted in PG&E Letter DCL-04-131.

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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

why1/4279
Enclosure
cc: Edgar Bailey, DHS
Bruce S. Mallett, Region IV
Terry W. Jackson, Senior Resident Inspector
Diablo Distribution
cc/enc: Girija S. Shukla, NRR

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

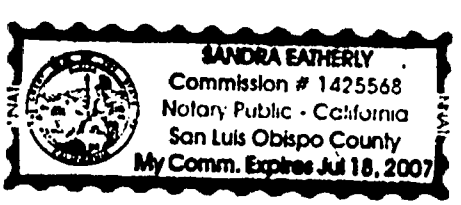
AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath states that he is Vice President and General Manager of Pacific Gas and Electric Company; that he has executed this response to the NRC request for additional information regarding License Amendment Request 04-05 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 31st day of October, 2005, by David H. Oatley, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Notary Public
County of San Luis Obispo
State of California



Response to Request for Additional Information Regarding License Amendment Request 04-05, "Revision to Technical Specification (TS) Requirements for Handling Irradiated Fuel in the Primary Containment and the Fuel Handling Building and Selected Specifications Associated with Performing Core Alterations"

The changes in License Amendment Request (LAR) 04-05 revise, in part, the electrical and instrumentation Technical Specifications (TS) to be consistent with changes previously approved in License Amendments 163/165. Those amendments revised the applicability of the fuel handling building (FHB) ventilation system TS to apply to only the movement of recently irradiated fuel.

The maintenance rule, 10 CFR 50.65(a)(4), requires that the plant risk be assessed and managed during movement of fuel or other activities in the FHB while the unit is shut down. This would include assessing the capability to filter and monitor any radioactivity releases in the event of a fuel handling accident (FHA) to reduce doses even further beyond that provided by natural decay. Diablo Canyon Power Plant Administrative Procedure AD8.DC55, "Outage Safety Scheduling," defines the process for planning and scheduling outage activities to minimize shutdown risk and optimize defense-in-depth (the availability of plant safety systems and electrical sources). This procedure addresses requirements for Class 1E electrical power and FHB ventilation. In addition, AD8.DC55 references both 10 CFR 50.65(a)(4), "The Maintenance Rule," and NUMARC 93-01, "Shutdown Maintenance Guidelines," as the guiding documents.

Other plant procedures also require that radiation monitoring capability, in addition to the permanently installed radiation monitors, be provided for fuel movement in the spent fuel pool, i.e., additional functional radiation monitor(s). The OP B-8 series of plant operating procedures for fuel handling employ various methods of monitoring for excessive radioactivity in the area which could be the result of a FHA or hot particles emerging from the water. The procedures listed below require portable radiation monitors be available for use with a continuous air monitor located in the FHB and applicable sections of these procedures are referenced as follows:

DCPP Operating Procedure OP B-8D, "Core Alterations Checklist"

Attachment 9.1, "Core Unloading Prerequisites Checklist," Step 5 - Portable radiation monitor(s) are available for use on the manipulator crane and spent fuel bridge crane, and a continuous area monitor is located in containment (140 ft el.) and the FHB.

Attachment 9.2, "Core Loading Prerequisites Checklist," Step 13 - Portable radiation monitor(s) are available for use on the manipulator crane and spent fuel bridge crane, and a continuous area monitor is located in containment (140 ft el.) and the FHB.

DCPP Operating Procedure OP B-8H, "Spent Fuel Pool Work Instructions"

Prerequisite Step 4.12 - The Spent Fuel Pool and New Fuel Storage Vault Radiation Monitors (RM-58/ 59) are OPERABLE per TS 3.3.8 (being revised by LAR 04-05) and a Gaseous Activity Monitor is in service per RCP D-200 Radiation Control Procedure. (Note: RM-58 and RM-59 are the permanently installed radiation monitors in the FHB.)

DCPP Abnormal Operating Procedure OP AP-21, "Irradiated Fuel Damage"

In this procedure, instructions are provided for actions to be taken by the crew in the event of a high radiation detection alarm from either the permanently installed radiation monitors or the portable radiation monitors during fuel movement.

While the portable radiation monitors do not have any automated functions, they are more sensitive in alerting the crew to worsening radiological conditions, and provide an alert earlier than the permanently installed RM-58/59 radiation monitors. The portable radiation monitors allow the crew to take corrective or mitigating actions before any automated action is initiated by the permanently installed RM-58/59 radiation monitors.