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August 20, 2008

PG&E Letter DCL-08-073

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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Supplement to License Amendment Request 08-01, "Revision to Technical Specification 5.5.16, 'Containment Leakage Rate Testing Program'"

Dear Commissioners and Staff:

PG&E Letter DCL-08-008, dated February 1, 2008, submitted License Amendment Request (LAR) 08-01, "Revision to Technical Specification 5.5.16, 'Containment Leakage Rate Testing Program.'" LAR 08-01 proposed to revise Technical Specification (TS) 5.5.16.a to add an exception to Regulatory Guide (RG) 1.163 to allow use of Standard ANSI/ANS 56.8-2002, and to revise TS 5.5.16.b to specify both a lower peak calculated containment internal pressure following a large-break loss-of-coolant accident (LOCA) and the containment design pressure.

The proposed revision to TS 5.5.16.a would have allowed performance of Types A, B, and C containment leak-tests in accordance with the guidance provided in ANSI/ANS-56.8-2002. The 2002 standard clarifies requirements in the 1994 version of the standard. Use of the 2002 version was expected to result in the performance of fewer Type C as-found tests for those penetrations that require testing on a fixed refueling outage frequency at DCPP.

On July 30, 2008, the NRC staff informed PG&E by telephone that they would be unable to approve the proposed change to TS 5.5.16.a by January 23, 2009, the date requested by PG&E in LAR 08-01. The staff informed PG&E that staff review of ANSI/ANS-56.8-2002 is not yet complete and that once the review is completed, the staff will revise RG 1.163 to endorse ANSI/ANS-56.8-2002, with any required exceptions. The staff indicated the schedule for completion of the RG 1.163 revision is by the end of 2009 and the staff will then be able to review proposed TS revisions submitted by licensees based on the revised RG 1.163 and ANSI/ANS-56.8-2002.

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As a result of the staff being unable at this time to approve PG&E's proposed change to TS 5.5.16.a, PG&E is, by this letter, submitting a supplement to LAR 08-01 that deletes the change to TS 5.5.16.a proposed in LAR 08-01. Enclosures 1 and 2 of this supplement contain revised marked-up and retyped (clean) TS pages, respectively. These two enclosures supersede Enclosures 2 and 3 of PG&E Letter DCL-08-008 in their entirety. The marked-up and retyped TS pages in Enclosures 2 and 3 reflect Amendment 198 for Diablo Canyon Power Plant (DCPP) Unit 1 and Amendment 199 for DCPP Unit 2, issued on January 8, 2008. There are no TS Bases changes required for this LAR supplement. The description, technical analysis, and no significant hazards consideration determination for the proposed change to TS 5.5.16.b in Enclosure 1 of PG&E Letter DCL-08-008 remain applicable. The staff indicated in the July 30, 2008, telephone call that there are currently no issues with the proposed change to TS 5.5.16.b.

There are no new or revised regulatory commitments in this letter.

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

I state under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2008.

Sincerely,

James R. Becker
*Site Vice-President and Station Director*

kjse/4328/A0736716
Enclosures
cc: Gary W. Butner, California DPH
Elmo E. Collins, NRC Region IV
Michael S. Peck, NRC Senior Resident Inspector
Diablo Distribution
cc/enc: Alan B. Wang, NRC Project Manager

**Proposed Technical Specification Changes (marked-up)**

5.5 Programs and Manuals

5.5.15 Safety Function Determination Program (SFDP) (continued)

b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or

c. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. 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.

5.5.16 Containment Leakage Rate Testing Program

a. A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, as modified by the following exceptions:

1. The visual examination of containment concrete surfaces intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B testing, will be performed in accordance with the requirements of and frequency specified by ASME Section XI Code, Subsection IWL, except where relief has been authorized by the NRC.

2. The visual examination of the steel liner plate inside containment intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B, will be performed in accordance with the requirements of and frequency specified by ASME Section XI code, Subsection IWE, except where relief has been authorized by the NRC.

3. The ten-year interval between performance of the integrated leakage rate (Type A) test, beginning May 4, 1994, for Unit 1 and April 30, 1993, for Unit 2, has been extended to 15 years.

b. The peak calculated containment internal pressure for the design basis loss of coolant accident, $P_a$, is 43.5 ~~47~~ psig. The containment design pressure is 47 psig.

c. The maximum allowable containment leakage rate, $L_a$, at $P_a$, shall be 0.10% of containment air weight per day

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Proposed Technical Specification Changes (retyped)

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5.5 Programs and Manuals

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