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**Pacific Gas and
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PG&E Letter DCL-08-100

U.S. Nuclear Regulatory Commission
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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 07-03, Revision to Technical
Specification 3.7.10, Control Room Ventilation System (CRVS)

- References:
1. PG&E Letter DCL-07-114, "License Amendment Request 07-03, Revision to Technical Specification 3.7.10, Control Room Ventilation System (CRVS)," dated December 26, 2007
 2. Technical Specification Task Force Technical Specification Change Traveler, TSTF-448, Revision 3

Dear Commissioners and Staff:

Pacific Gas and Electric Company (PG&E) submitted Reference 1 to revise Technical Specification (TS) 3.7.10, "Control Room Ventilation System (CRVS)," to modify TS requirements related to control room envelope habitability in accordance with Technical Specification Task Force (TSTF) Traveler number TSTF-448, Revision 3, consistent with the notice published in the *Federal Register* on January 17, 2007, as part of the consolidated line item improvement process.

Subsequent to the Reference 1 submittal, the NRC identified a difference between the DCPD proposed change and the current NUREG-1431 standard TS. This change will make DCPD TS 3.7.10 Condition C consistent with TSTF-448 and NUREG-1431.

This letter provides a supplement to the Reference 1 proposed TS 3.7.10 and TS 3.7.10 Bases, to revise Condition C to state, "Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4." The current DCPD TS 3.7.10 Condition C only applies if Condition A is not met.

A description of the required change is contained in Enclosure 1.

NRR A001
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A revised marked-up TS page for TS 3.7.10, page 3.7-18, is contained in Enclosure 2. A revised retyped TS page for TS 3.7.10, page 3.7-18, is contained in Enclosure 3. The revised marked-up and retyped TS Pages supersede those previously provided in Enclosure 2 and Enclosure 3 of Reference 1, respectively.

No changes to the proposed TS 3.7.10 TS Bases pages are required as a result of this change.

This information does not affect the results of the technical evaluation, or the no significant hazards consideration determination, previously transmitted in Reference 1.

PG&E makes no regulatory commitments (as defined by NEI 99-04) in this letter. This letter includes no revisions to existing regulatory commitments.

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 November 25, 2008.

Sincerely,

John T. Conway
Senior Vice President & Chief Nuclear Officer

mjrm/4557/50034939

Enclosures

cc: Gary W. Butner, California Department of Public Health
Elmo E. Collins, NRC Region IV
Michael S. Peck, NRC, Senior Resident Inspector
Diablo Distribution
cc/enc: Alan B. Wang, NRC Project Manager, NRR

**Revised TS 3.7.10
for License Amendment Request 07-03, "Revision to Technical Specification
3.7.10, Control Room Ventilation System (CRVS)"**

Pacific Gas and Electric Company (PG&E) Letter DCL-07-114, "License Amendment Request 07-03, Revision to Technical Specification 3.7.10, 'Control Room Ventilation System (CRVS),' dated December 26, 2007 (Reference 1), was submitted to modify TS requirements related to control room envelope habitability in accordance with Technical Specification Task Force (TSTF) Traveler number TSTF-448, Revision 3, consistent with the notice published in the *Federal Register* on January 17, 2007, as part of the consolidated line item improvement process.

PG&E is providing this supplement to revise the proposed changes in Reference 1 revising TS 3.7.10 Condition C to state, "Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4." The current DCP TS 3.7.10 Condition C only applies if Condition A is not met. This change is already present in NUREG-1431. This change will make DCP TS 3.7.10 Condition C consistent with TSTF-448 and NUREG-1431.

No changes to the proposed TS 3.7.10 TS Bases pages are required as a result of this change. The proposed TS Bases changes provided in Reference 1 already include the following which discuss Condition C required actions and Completion Times for Condition B Completion Times not met:

"In MODE 1, 2, 3, or 4, if the inoperable CRVS train or the CRE boundary cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems."

The TS Bases changes will be implemented pursuant to TS 5.5.14, "Technical Specifications Bases Control Program."

Enclosure 2
PG&E Letter DCL-08-100

Proposed Technical Specification Page 3.7-10 (marked-up)

3.7 PLANT SYSTEMS

3.7.10 Control Room Ventilation System (CRVS)

LCO 3.7.10 Two CRVS trains shall be OPERABLE.

-----NOTE-----

The ~~C~~ontrol R~~o~~om envelope (CRE) boundary may be opened intermittently under administrative controls.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6.
During movement of recently irradiated fuel assemblies.

ACTIONS

-----NOTE-----

ACTIONS apply simultaneously to both units.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRVS train inoperable <u>for reasons other than Condition B.</u>	A.1 Restore CRVS train to OPERABLE status.	7 days
B. Two One or more CRVS trains inoperable due to inoperable control room CRE boundary in MODE 1, 2, 3, or 4.	B.1 <u>Initiate action to implement mitigating actions.</u>	24 hours Immediately
	AND	
	B.2 <u>Verify mitigating actions ensure CRE occupant exposures to radiological hazards will not exceed limits, and CRE occupants are protected from smoke and chemical hazards.</u>	24 hours
	AND	
	B.3 4 Restore control room CRE boundary to OPERABLE status.	90 days
C. Required Action and associated Completion Time of Condition A <u>or B</u> not met in MODE 1, 2, 3, or 4.	C.1 Be in MODE 3.	6 hours
	AND	
	C.2 Be in MODE 5.	36 hours

(continued)

Proposed Technical Specification Page 3.7-10 (retyped)

Remove Page

3.7-18

Insert Page

3.7-18

3.7 PLANT SYSTEMS

3.7.10 Control Room Ventilation System (CRVS)

LCO 3.7.10 Two CRVS trains shall be OPERABLE.

-----NOTE-----

The control room envelope (CRE) boundary may be opened intermittently under administrative controls.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6.
During movement of recently irradiated fuel assemblies.

ACTIONS

-----NOTE-----

ACTIONS apply simultaneously to both units.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRVS train inoperable for reasons other than Condition B.	A.1 Restore CRVS train to OPERABLE status.	7 days
B. One or more CRVS trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4.	B.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>	
	B.2 Verify mitigating actions ensure CRE occupant exposures to radiological hazards will not exceed limits, and CRE occupants are protected from smoke and chemical hazards.	24 hours
	<u>AND</u>	
	B.3 Restore CRE boundary to OPERABLE status.	90 days
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Be in MODE 5.	36 hours

(continued)