



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 18, 2009

LICENSEE: PACIFIC GAS AND ELECTRIC COMPANY
FACILITY: DIABLO CANYON POWER PLANT, UNITS 1 AND 2
SUBJECT: SUMMARY OF JULY 22, 2009, MEETING WITH PACIFIC GAS AND ELECTRIC COMPANY, ON TECHNICAL SPECIFICATION INTERPRETATION OF 230 KV OFFSITE POWER SYSTEM (TAC NOS. ME0711 AND ME0712)

On July 22, 2009, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Pacific Gas and Electric Company (PG&E, the licensee) at NRC Headquarters, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland. By letter dated February 23, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML090650592), PG&E requested an NRC interpretation of Technical Specification (TS) 3.8.1, "AC Sources – Operating," and TS 3.8.2, "AC Sources – Shutdown." PG&E had requested this meeting to provide additional background and clarification in support of its request. A list of attendees is enclosed.

In the February 23, 2009, letter, the licensee stated that its licensing position regarding the operability of the 230 kilovolt (kV) offsite power system at Diablo Canyon Power Plant (DCPP) to meet TS 3.8.1 and TS 3.8.2 as follows:

The 230 kV offsite power system is considered operable for normal and off-normal configurations when load flow and dynamic loading analyses demonstrate that the 230 kV system has sufficient capacity and capability to operate the engineered safety features for a design basis accident (or unit trip) on one unit, and those systems required for an orderly shutdown of the second unit. A concurrent trip of the second unit need not be assumed. Operability is based on the ability to transfer to the 230 kV offsite power system without loading the emergency diesel generators, and provide adequate voltage to safety-related loads.

The NRC staff's review divided the request into two parts: (1) the TS interpretation of TS 3.8.1 and 3.8.2, and (2) the licensing basis interpretation supporting the licensee's definition of operability of the 230 kV system. The NRC staff stated its preliminary conclusions are that the NRC disagrees with licensee's position regarding TS 3.8.1 and TS 3.8.2 operability and its licensing basis position that the 230 kV system has sufficient capacity and capability to operate the engineered safety features (ESF) for a design-basis accident (or unit trip) on one unit, and those systems required for an orderly shutdown of the second unit and that a concurrent trip of the second unit need not be assumed. In addition, the NRC staff noted that in the PG&E license amendment request (LAR 98-01) dated January 14, 1998, as supplemented on February 5, 1999, the licensee did not request a change to the licensing basis regarding the above position nor did the NRC staff in its approval of Amendment Nos. 132 and 130 for DCPP, Units 1 and 2, respectively, dated April 29, 1999, approve the above licensing basis position.

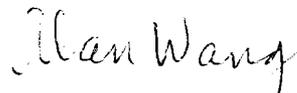
The licensee provided the NRC staff presentation slides in support of this meeting (ADAMS Accession No. ML092040370). PG&E discussed the 230 kV system, including a discussion of the design and the load flow analyses supporting the design, a history of the design and licensing basis, system upgrades related to license amendment request 98-01, and DCP's operating history. PG&E stated it agreed that: (1) the current TS would not support its interpretation of operability for TS 3.8.1 and TS 3.8.2; (2) the design basis for the DCP is Institute of Electrical and Electronics Engineers (IEEE) 308-1971; and (3) PG&E did not request a change to the licensing basis regarding the 230 kV system in LAR 98-01. However, PG&E stated the design/licensing basis for the 230 kV system is to provide sufficient capacity and capability to operate the ESF loads design-basis accident (or unit trip) on one unit, and those systems required for an orderly shutdown of the second unit and was clarified by LAR 98-01 and validated by the NRC in its approval of the amendment request. PG&E also stated that the load flow analyses of record, performed to demonstrate the adequacy of the 230 kV system, reflect both the loads associated with an accident in one unit and the shutdown loads of the other unit in meeting the total preferred capacity requirement of the 230 kV system as required by IEEE 308-1971.

The NRC had the following questions as result of the meeting:

1. What sequences the ESF loads on?
2. Do the second level undervoltage relays (SLURS) meet the branch technical position?
3. Is a dual unit trip an anticipated operational occurrence?
4. Verify that Procedure 023 does not assume any operation from two units.
5. What is the operational impact of a "concurrent" versus "orderly" shutdown of the second unit?

Members of the public were not in attendance. Public Meeting Feedback forms were not received.

The NRC staff thanked PG&E for the presentation and noted that a decision on its February 23, 2009, request will be made after review of the requested information. Please direct any inquiries to me at 301-415-1445, or Alan.Wang@nrc.gov.



Alan B. Wang, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

JULY 22, 2009, MEETING WITH PACIFIC GAS AND ELECTRIC (PG&E)

TECHNICAL SPECIFICATION INTERPRETATION OF

DIABLO CANYON POWER PLANT 230 KV SYSTEM

| <u>NAME</u> | <u>AFFILIATION</u> |
|------------------|--------------------|
| Stan Ketelsen | PG&E |
| Ryan West | PG&E |
| Loren Sharp | PG&E |
| Susan Wescott | PG&E |
| Larry Parker | PG&E |
| David Repke | Winston & Strawn |
| Carl Schulten | NRC |
| Mauri Lemoncelli | NRC |
| Michael Markley | NRC |
| Vincent Gaddy | NRC |
| Sheila Ray | NRC |
| G. Singh Matharu | NRC |
| Gerald Waig | NRC |
| Tony Brown | NRC |
| Roy Mathew | NRC |
| Kenn Miller | NRC |
| Michael Peck | NRC |
| Alan Wang | NRC |

Enclosure

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/ra/

Alan B. Wang, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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DISTRIBUTION:

| | | |
|--------------------------------|------------------------------|-----------------------|
| PUBLIC | RidsNrrLAJBurkhardt Resource | SRay, NRR/DE/EEEB |
| Branch Reading | RidsOgcRp Resource | GMatharu, NRR/DE/EEEE |
| RidsAcrsAcnw_MailCTR Resource | RidsRgn4MailCenter Resource | VGaddy, RIV |
| RidsNrrDeEeeb Resource | CSchulten, NRR/DIRS/ITSB | MPeck, RIV |
| RidsNrrDirsltsb Resource | GWaig, NRR/DIRS/ITSB | TBrown, RIV |
| RidsNrrDorLpl4 Resource | RMathew, NRR/DE/EEEE | LTrocine, EDO RIV |
| RidsNrrPMDiabloCanyon Resource | KMiller, NRR/DE/EEEB | MLemoncelli, OGC |

ADAMS Accession No. PKG ML092090388, Meeting Notice : ML091890794, Meeting Summary: ML092090387, Handouts ML092040370

| OFFICE | DORL/LPL4/PM | DORL/LPL4/LA | DIRS/ITSB/BC | DE/EEEB/BC | DORL/LPL4/BC | DORL/LPL4/PM |
|--------|--------------|--------------|--------------|------------|-----------------------|------------------|
| NAME | AWang | JBurkhardt | RElliott | GWilson | MMarkley MThadani for | AWang JRHall for |
| DATE | 8/6/09 | 8/5/09 | 8/14/09 | 8/17/09 | 8/18/09 | 8/18/09 |