



James R. Becker
Site Vice President

Diablo Canyon Power Plant
Mail Code 104/5/601
P. O. Box 56
Avila Beach, CA 93424

805.545.3462
Internal: 691.3462
Fax: 805.545.6445

July 22, 2010

PG&E Letter DCL-10-085

10 CFR 50.90

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

Commitment Regarding License Amendment Request 09-02, "Revision to Technical Specification 3.4.15, 'RCS Leakage Detection Instrumentation,' Operability Requirements and Actions for RCS Leakage Detection Instrumentation"

- Reference:
1. PG&E Letter DCL-09-49, "License Amendment Request 09-02, Revision to Technical Specification 3.4.15, 'RCS Leakage Detection Instrumentation,' Operability Requirements and Actions for RCS Leakage Detection Instrumentation," dated July 3, 2009.
 2. Technical Specification Task Force Letter TSTF-09-14, "Response to May 6, 2009 Request for Additional Information Regarding TSTF-513, Revision 1, 'Revise PWR Operability Requirements and Actions for RCS Leakage Instrumentation,'" dated June 18, 2009.

Dear Commissioners and Staff:

In Reference 1, Pacific Gas and Electric (PG&E) submitted License Amendment Request (LAR) 09-02, "Revision to Technical Specification 3.4.15, 'Reactor Coolant System (RCS) Leakage Detection Instrumentation,' Operability Requirements and Actions for RCS Leakage Detection Instrumentation." The LAR 09-02 proposed changes would amend the Operating Licenses to revise Technical Specification (TS) 3.4.15 and the TS 3.4.15 Bases.

In Reference 2, the Technical Specifications Task Force (TSTF) submitted TSTF-513, Revision 2, for NRC approval. TSTF-513, Revision 2, proposes changes to the Improved Standard Technical Specification (ISTS) 3.4.15, "RCS Leakage Detection Instrumentation," for pressurized water reactors. TSTF-513, Revision 2, is currently being reviewed by the staff. PG&E submitted LAR 09-02 independent of TSTF-513 because the gaseous radioactivity monitor has been declared inoperable on each unit and the TS 3.4.15.c containment fan cooler unit (CFCU) condensate collection monitor has been placed in service. The use of the CFCU condensate collection monitor is a burden for plant operators because it is a manually operated leakage detection system. In addition, differences in the Diablo



Document Control Desk
July 22, 2010
Page 2

PG&E Letter DCL-10-085

Canyon Power Plant Units 1 and 2 TS 3.4.15 Limiting Condition for Operation (LCO) from the ISTS LCO 3.4.15 prevent use of TSTF-513 in an efficient manner.

When TSTF-513 is approved by the staff, it may contain TS requirements that significantly deviate from those proposed by PG&E in Reference 1. PG&E will follow the efforts of the Technical Specification Task Force (TSTF) and NRC to finalize the details and scope of the changes needed to resolve the TSTF-513 RCS leakage detection issue. If the approved TSTF Traveler TS is more restrictive than the proposed TS in Reference 1, then PG&E will submit a separate license amendment request to implement the approved generic change within 6 months of approval of the TSTF Traveler. This is a regulatory commitment as defined by NEI 99-04.

This letter includes no revisions to existing regulatory commitments.

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

Sincerely,

James R. Becker
Site Vice President

kjse/4328/50109826

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