



January 31, 2011

PG&E Letter DIL-11-001

10 CFR 72.56 and 72.7

ATTN: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Materials License No. SNM-2511, Docket No. 72-26  
Diablo Canyon Independent Spent Fuel Storage Installation  
License Amendment Request 11-001  
Revision to Technical Specifications 1.1, 2.0, 3.1.1, 3.1.2, 4.1.2, and 5.1.3; Addition  
of Technical Specifications 2.3 and 3.1.4; and, Request for an Exemption from the  
Requirements of 10 CFR 72.236(f).

Dear Commissioners and Staff:

Pursuant to 10 CFR 72.56, Pacific Gas and Electric Company (PG&E) hereby requests an amendment to Materials License No. SNM-2511, Docket No. 72-26, for the Diablo Canyon Independent Spent Fuel Storage Installation (DC ISFSI), to revise the technical specifications (TS) as follows:

- (1) TS 1.1, "Definitions," is revised to include terms in support of high burnup fuel (HBF) selection criteria and the addition of neutron source assemblies (NSAs), and instrument tube tie rods (ITTRs).
- (2) TS 2.0, "Approved Contents," is revised in Tables 2.1-1 through 2.1-10 in support of HBF selection criteria and the addition of NSAs, and ITTRs.
- (3) TS 2.0, "Approved Contents," is revised to add new TS 2.3 and associated Table 2.3-1 to provide alternative calculations for burnup limits for fuel assemblies in a Multi-Purpose Canister (MPC)-32 to allow selection of HBF.
- (4) TS 3.1.1, "Multi-Purpose Canister (MPC)," is revised to eliminate the vacuum drying option, which is not allowed for HBF, and to add a reference temperature of 70°F for the MPC Helium backfill pressure range.
- (5) TS 3.1.2, "Spent Fuel Storage Cask (SFSC) Heat Removal System," is modified to allow the HI-STORM to be considered operable with up to

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50 percent vent blockage (although removal of any blockage is still required on discovery).

- (6) TS 3.1.4, "Supplemental Cooling System," is added to provide the conditions and criteria for the supplemental cooling system (SCS). This change requires an exemption from the requirements of 10 CFR 72.236(f).
- (7) TS 4.1.2b, "Design Features Important to Criticality Control," is revised to change the B<sub>4</sub>C content in METAMIC to  $\leq 33.0$  wt%.
- (8) TS 5.1.3b, "MPC and SFSC Loading, Unloading, and Preparation Program," is revised to delete the requirement for maintaining the annulus full during vacuum drying and to restore the requirement for maintaining the annulus full during reflood (unloading).

This proposed license amendment would also revise the licensing basis as documented in the DC ISFSI Final Safety Analysis Report Update (FSARU) to: (1) upgrade the thermal analysis methodology to a three dimensional (3D) Computational Fluid Dynamics (CFD) model, (2) remove the requirement for 100 percent fuel failure coincident with 100 percent vent blockage, (3) change of some allowed component temperatures in the thermal evaluation (peak cladding, concrete, overpack metal, transfer cask lid neutron shielding), (4) reduce the required torque criteria for the MPC lift cleats, and (5) addition of design criteria for the SCS including a new accident for loss of SCS.

Finally, this submittal requests an exemption from the requirements of 10 CFR 72.236(f) to allow use of a nonpassive SCS. PG&E requests that the exemption be approved and issued by the NRC concurrent with the approval of this license amendment request (LAR).

PG&E is providing supporting documentation including analyses in Enclosure, Attachments 1 through 8. Attachments 1, 2, 3, and 4 are nonproprietary. They include a markup of the affected TS pages, a clean version of revised TS pages, a markup of the affected TS Bases pages, and a mark up of affected FSARU pages, respectively. Attachments 5 and 7 are also nonproprietary. They contain the affected Holtec International Report HI-2002563, "Dose Evaluation for the ISFSI at Diablo Canyon Power Station," Revision 8, and Holtec International Report HI-2104625, "Three Dimensional Thermal-Hydraulic Analyses for Diablo Canyon Site-Specific HI-STORM System Design," Revision 3, respectively. Attachments 6 and 8 are proprietary. They contain the proprietary versions of the same Holtec Reports, including proprietary thermal data files on optical storage media (OSM), DVD-ROM.



Attachments 9 and 10 contain affidavits signed by Holtec, the owner the proprietary information. The affidavits set forth the basis on which the Holtec information contained in Enclosure, Attachments 6 and 8, including the DVD-ROMs, may be withheld from public disclosure by the Commission consistent with the Freedom of Information Action ("FOIA"), 5 USC Section 552(b)(4) and the Trade Secrets Act, 18 USC Section 1905, and NRC regulations 10 CFR 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1). PG&E requests that the Holtec proprietary information be withheld from public disclosure in accordance with these laws and regulations.

Correspondence with respect to the proprietary aspects of the application or the Holtec affidavits provided in Enclosure, Attachments 6 and 8 should be addressed to Ms Kelly Kozink, Holtec International, 555 Lincoln Drive West, Marlton, New Jersey 08053.

PG&E has determined that this license amendment request (LAR) is consistent with the considerations governing issuance of the initial license, 10 CFR 72.58. Pursuant to 10 CFR 51.22(b), an environmental assessment or environment impact statement is not required in connection with issuance of this proposed amendment.

The changes in this LAR are not required to address an immediate safety concern. PG&E requests approval of this LAR be assigned a medium priority for review and approval, and requests that the amendment be issued no later than June 15, 2011. PG&E requests the License Amendment be made effective upon NRC issuance, to be implemented within 60 days of issuance.

In accordance with 10 CFR 50.91, PG&E is notifying the State of California of this LAR by transmitting a copy of this letter and enclosure to the designated State Official.

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 Mr. Tom Baldwin at (805) 545-4720.



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

Executed on January 31, 2011.

Sincerely,

James R. Becker  
*Site Vice President*

Enclosures

cc/: Diablo Distribution  
cc/enc: Gary W. Butner, California Department of Public Health  
Elmo E. Collins, NRC Region IV  
John M. Goshen, NRC Project Manager, Office of Nuclear Material  
Safety and Safeguards  
Michael S. Peck, NRC Senior Resident Inspector