

NFPA 805 Transition Project

Pre-Application Meeting with NRC

04/11/2011





INTRODUCTION

PG&E Representatives

Michael Richardson.....Regulatory Services

Paul Bemis.....Strategic Projects Oversight (SPO)

Brent Waggener.....Technical Coordinator

John Pyo.....FPRA / FREs Lead (by phone)

Project Consultants – EPM and Tri-En

Bob Kalantari.....Director of Engineering (EPM) (by phone)

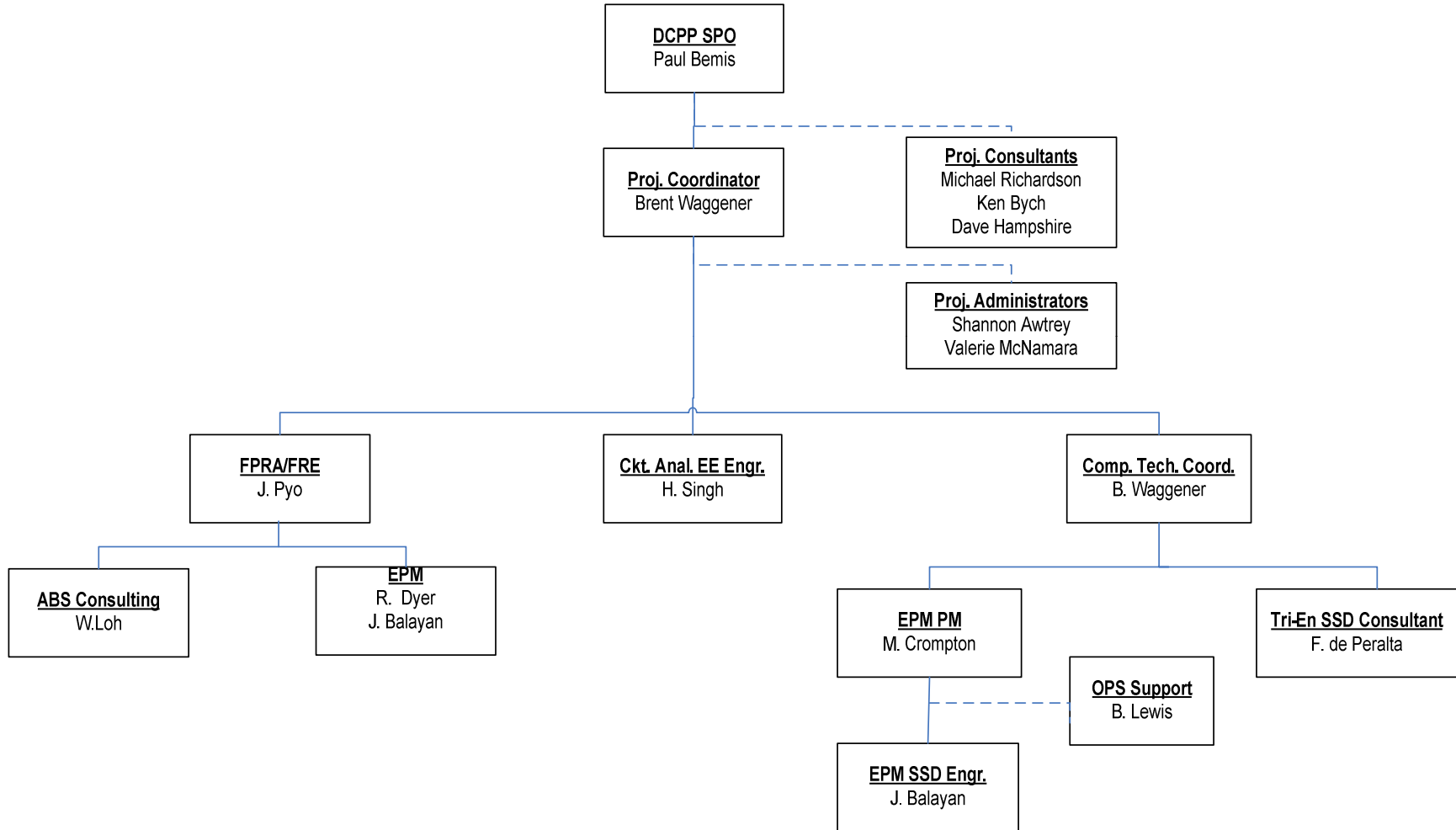
Mark Crompton.....Project Manager (EPM)

Ray Dyer.....Site FRE Engineer (EPM)

Fleur de Peralta.....Project Manager (Tri-En) (by phone)



NFPA 805 TRANSITION PROJECT ORGANIZATION CHART



DIABLO CANYON POWER PLANT



SUBMITTAL TYPE

4

**PG&E will make a full NFPA 805
LAR submittal on June 29, 2011**

**Implementation of the proposed 'staggered' submittal
process may impact this decision**

Augment submittal



MEETING OBJECTIVES

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- **Share progress**
 - **FPRA**
 - **FREs**
 - **Transition Report**
- **Discuss challenges**
- **PG&E LAR review process**
- **Discuss modifications**
- **Post LAR submittal tasks**



PROGRESS

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Fire PRA Model Development

Peer Review: (December 6-9, 2010)

- **16 Findings**
 - **4 Resolved**
 - **12 Open (to be completed by 6/29/2011)**
- **Best Practices (CS, FSS, MCA)**
- **All supporting requirements (SRs) Capability Category-II (CC-II) or higher except two CC-I's**
 - **Site specific data is being gathered to upgrade CC-I's to CC-II's**
- **Deviations from guidance in FPRA Model?**



PROGRESS (Cont)

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Fire Risk Evals (FREs)

- VFDR Descriptions Complete
- Determination of Δ Risk
 - As-Built Complete
 - As-Modified *(Completion early May, once Mods/RAs identified)*
- Recovery Action Identification 5/02/2011
 - In progress (Anticipate ~35/Unit)
- Modification Identification 5/02/2011
 - In progress
 - E.g., Incipient Detn, RCP seal cooling and ERFBSs.
- Deviations carried forward as Recovery Actions or DID actions?



PROGRESS (Cont)

Transition Report

Complete/Under Review

Fundamental Fire Protection Review (Table B-1)

NSCA Methodology Review (Table B-2)

Radioactive Release Review

NSCA

Non-Power Operations

In Progress

Fire Area Transition (Table B-3)

FREs

Transition Report



CHALLENGES

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- **Time constraints**
 - **1 Pass on FREs**
 - Iterations to be performed post-submittal
- **Industry resource constraints**
 - **Limited number of qualified people**
- **Internal management reviews**
 - **Director level reviews**



CHALLENGES (Cont)

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- **Other Large DCPP LARs**
 - License Renewal
 - Digital Controls
 - Long Term Seismic Program
- **License Basis Verification Project**
- **Outage – 2R16**



REVIEWS

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PG&E LAR Review Process

- Internal LAR sufficiency review



MODIFICATIONS

- **Incipient Detection**
- **RCP Seal Cooling**
- **ERFBS**

Installation prior to SER?

If so, when?



POST-LAR SUBMITTAL TASKS¹³

DCPP plans to perform additional iterations using RIPB evaluation techniques to optimize the number of modifications needed to achieve performance objectives.



SUMMARY

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- **Full submittal on 6/29/2011**
 - **staggering may impact**
- **Conservative Compliance Strategies**
- **Additional FRE/RIPB Iterations**
- **Augment submittal**