

November 1, 2012

PG&E Letter DCL-12-107

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

10 CFR 50.90

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Supplement to PG&E Letter DCL-11-059, "License Amendment Request 11-04,
Revision to Technical Specification (TS) 3.6.6, 'Containment Spray and Cooling
Systems,' TS 3.7.5, 'Auxiliary Feedwater (AFW) System,' TS 3.8.1, 'AC Sources -
Operating,' TS 3.8.9, 'Distribution Systems - Operating,' and TS Example 1.3-3"

Reference: 1. PG&E Letter DCL-11-059, "License Amendment Request 11-04,
Revision to Technical Specification (TS) 3.6.6, 'Containment Spray
and Cooling Systems,' TS 3.7.5, 'Auxiliary Feedwater (AFW)
System,' TS 3.8.1, 'AC Sources - Operating,' TS 3.8.9, 'Distribution
Systems - Operating,' and TS Example 1.3-3," dated June 1, 2011

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted a license amendment request to revise Technical Specification (TS) 3.6.6, "Containment Spray and Cooling Systems," TS 3.7.5, "Auxiliary Feedwater (AFW) System," TS 3.8.1, "AC Sources - Operating," TS 3.8.9, "Distribution Systems - Operating," and TS Example 1.3-3.

Based on a design change installed in Diablo Canyon Power Plant Unit 1 and scheduled to be installed in Unit 2 during Unit 2 Refueling Outage Seventeen that affects the input to the AFW automatic level control system, the proposed change to add a new TS 3.7.5 Condition B will no longer be needed. This supplement removes portions of the original license amendment request submitted in Reference 1.

PG&E is making a regulatory commitment (as defined by NEI 99-04) in this letter and is revising a previous regulatory commitment associated with the proposed new TS 3.7.5 Condition B, as detailed in the enclosure.

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



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

Executed on November 1, 2012.

Sincerely,

A handwritten signature in blue ink that reads "Barry S. Allen".

Barry S. Allen
Site Vice President

Mjrm/4557/50329767

Enclosure

cc: Diablo Distribution

cc/enc: Gonzalo L. Perez, California Dept of Public Health

Elmo E. Collins, NRC Region IV

Laura H. Micewski, Acting NRC Senior Resident Inspector

Joseph M. Sebrosky, NRR Project Manager

Supplement to PG&E Letter DCL-11-059, "License Amendment Request 11-04, Revision to Technical Specification (TS) 3.6.6, 'Containment Spray and Cooling Systems,' TS 3.7.5, 'Auxiliary Feedwater (AFW) System,' TS 3.8.1, 'AC Sources - Operating,' TS 3.8.9, 'Distribution Systems - Operating,' and TS Example 1.3-3."

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted license amendment request (LAR) 11-04 to revise Technical Specification (TS) 3.6.6, "Containment Spray and Cooling Systems," TS 3.7.5, "Auxiliary Feedwater (AFW) System," TS 3.8.1, "AC Sources - Operating," TS 3.8.9, "Distribution Systems - Operating," and TS Example 1.3-3.

LAR 11-04 included changes consistent with the following NRC-approved Technical Specification Task Force (TSTF) Travelers:

- TSTF-245, Revision 1, "AFW Train Operable when in Service"
- TSTF-340, Revision 3, "Allow 7 Day Completion Time for a Turbine-driven AFW Pump Inoperable"
- TSTF-412, Revision 3, "Provide Actions for One Steam Supply to Turbine Driven AFW/EFW Pump Inoperable"
- TSTF-439, Revision 2, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO"

In addition to the TSTF changes, LAR 11-04 included changes to address a design feature of the AFW system that has not been previously reviewed by the NRC associated with the Eagle-21 system input to the AFW level control system.

Subsequently, PG&E has made a design change (discussed below) to Diablo Canyon Power Plant (DCPP) Unit 1 that addressed the vulnerability, where one AFW level control valve on both motor driven AFW trains would be affected by an Eagle-21 rack lock-up. PG&E plans to perform the same design change to DCPP Unit 2 during Unit 2 Refueling Outage Seventeen.

This design change consists of installing a median signal select that, for each steam generator, takes three level signals processed through three separate Eagle-21 racks and passes the median signal to each AFW automatic level control system. These channels are processed by software using the same level of validation and configuration management used for the digital feedwater control system. Based on the design changes, the proposed revision to add a new TS 3.7.5 Condition B will no longer be needed.

PG&E hereby withdraws the portions of LAR related to the addition of a new TS 3.7.5 Condition B. Because LAR 11-04 identified portions of the LAR related to the TSTFs and the new TS 3.7.5 Condition B, a complete revision of the LAR is not necessary. This was discussed with the NRC project manager for DCPP on October 11, 2012. Revised "retyped" TS pages for affected pages are included in Attachment 1 of this

enclosure. These were originally submitted in Reference 1 with a revision to two of the pages revised in Reference 3.

PG&E is making the following regulatory commitment as defined in NEI 99-04:

PG&E plans to install a control system median signal selector on DCPD Unit 2 during Unit 2 Refueling Outage Seventeen, currently scheduled to begin in February 2013, to address the design vulnerability where an Eagle-21 rack lock-up can affect control of one level control valve per motor driven AFW train.

The following regulatory commitment, originally submitted in PG&E Letter DCL-11-059 (Reference 1) and revised in PG&E Letter DCL-12-076 (Reference 4), is being withdrawn:

“If steam generator level control is placed in manual alignment due to a failure of automatic control, PG&E will assign a dedicated operator for manual operation.”

Changes to the TS Bases and Updated Final Safety Analysis Report (UFSAR) will be made based on the remaining proposed changes after approval of the LAR in accordance with 10 CFR 50.59. Because the TS Bases and UFSAR pages were originally submitted for information only, no new revised pages are being submitted as a result of withdrawing the proposed new TS 3.7.5 Condition B.

During recent discussions with the NRC, the NRC requested clarification on the response to NRC RAI 2.b provided in Reference 2. Since the proposed change to address the Eagle-21 design vulnerability (new TS 3.7.5 Condition B) is no longer requested, a review of the response provided has been entered into the DCPD corrective action program for evaluation and resolution (reference SAPN 50517827).

REFERENCES:

1. PG&E Letter DCL-11-059, "License Amendment Request 11-04, Revision to Technical Specification (TS) 3.6.6, 'Containment Spray and Cooling Systems,' TS 3.7.5, 'Auxiliary Feedwater (AFW) System,' TS 3.8.1, 'AC Sources - Operating,' TS 3.8.9, 'Distribution Systems - Operating,' and TS Example 1.3-3," dated June 1, 2011
2. PG&E Letter DCL-12-017, "Response to NRC Request for Additional Information regarding PG&E Letter DCL-11-059, License Amendment Request 11-04, Revision to Technical Specification (TS) 3.6.6, 'Containment Spray and Cooling Systems,' TS 3.7.5, 'Auxiliary Feedwater (AFW) System,' TS 3.8.1, 'AC Sources - Operating,' TS 3.8.9, 'Distribution Systems - Operating,' and TS Example 1.3-3," dated February 6, 2012
3. PG&E Letter DCL-12-057, "Supplement to PG&E Letter DCL-12-017, Response to NRC Request for Additional Information: NRC Question 1," dated May 31, 2012.

4. PG&E Letter DCL-12-076, "Response to NRC Second Request for Additional Information regarding PG&E Letter DCL-11-059, "License Amendment Request 11-04, Revision to Technical Specification (TS) 3.6.6, 'Containment Spray and Cooling Systems,' TS 3.7.5, 'Auxiliary Feedwater (AFW) System,' TS 3.8.1, 'AC Sources - Operating,' TS 3.8.9, 'Distribution Systems - Operating,' and TS Example 1.3-3"

Revised Proposed Technical Specification Changes (Retyped) to Replace Pages
Provided in DCL-11-059 as revised in DCL-12-057

Remove Page

3.7-10
3.7-10a
3.7-11

Insert Page

3.7-10
3.7-11

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Three AFW trains shall be OPERABLE.

-----NOTE-----
Only one AFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 4.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4 when steam generator is relied upon for heat removal.

ACTIONS

-----NOTE-----
LCO 3.0.4b is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Turbine driven AFW train inoperable due to one inoperable steam supply.</p> <p><u>OR</u></p> <p>-----NOTE----- Only applicable if MODE 2 has not been entered following refueling. -----</p> <p>Turbine driven AFW pump inoperable in MODE 3 following refueling.</p>	<p>A.1 Restore affected equipment to OPERABLE status.</p>	<p>7 days</p>
<p>B. One AFW train inoperable in MODE 1, 2 or 3 for reasons other than Condition A.</p>	<p>B.1 Restore AFW train to OPERABLE status.</p>	<p>72 hours</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTE----- Only applicable when the remaining OPERABLE motor driven AFW train provides feedwater to the steam generator with the inoperable steam supply. ----- Turbine driven AFW train inoperable due to one inoperable steam supply. <u>AND</u> One motor driven AFW train inoperable.</p>	<p>C.1 Restore the steam supply to the turbine driven train to OPERABLE status. <u>OR</u> C.2 Restore the motor driven AFW train to OPERABLE status.</p>	<p>48 hours 48 hours</p>
<p>D. Required Action and associated Completion Time of Condition A, B, or C not met. <u>OR</u> Two AFW trains inoperable in MODE 1, 2 or 3 for reasons other than Condition C.</p>	<p>D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 4.</p>	<p>6 hours 18 hours</p>
<p>E. Three AFW trains inoperable in MODE 1, 2, or 3.</p>	<p>E.1 -----NOTE----- LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is restored to OPERABLE status. ----- Initiate action to restore one AFW train to OPERABLE status</p>	<p> Immediately</p>
<p>F. Required AFW train inoperable in MODE 4.</p>	<p>F.1 Initiate action to restore AFW train to OPERABLE status.</p>	<p>Immediately</p>