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PG&E Letter DCL-13-060

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2

Correction of Information Provided to NRC Inspectors During the 2012 Triennial Fire Protection Inspection

Reference: NRC Inspection Report, "DIABLO CANYON POWER PLANT, UNITS 1 AND 2 - NRC TRIENNIAL FIRE INSPECTION REPORT (05000275/2012008; 05000323/2012008) AND EXERCISE OF ENFORCEMENT DISCRETION," dated February 7, 2013. (ADAMS Accession No. ML13038A714)

In the above referenced NRC inspection report, NRC inspectors documented their findings from the 2012 Triennial Fire Protection Inspection at Diablo Canyon Power Plant (DCPP). One violation referenced incorrect information inadvertently provided by Pacific Gas and Electric Company (PG&E) staff during the inspection. The enclosure to this letter identifies that information, corrects it, and requests the NRC to correct the inspection report. DCPP personnel discussed this information with the lead inspector over the phone on May 7, 2013.

PG&E makes no regulatory commitments (as defined by NEI 99-04) in this letter.

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

Sincerely,

Barry S. Allen

MEM6/4418/SAPN 50559636-2

Enclosure

cc: Diablo Distribution

cc/encl: Thomas R. Hipschman, NRC Senior Resident Inspector

Arthur T. Howell, III, NRC Region IV

John M. Mateychick, NRC Region IV Inspector

James T. Polickoski, NRR Project Manager

Correction of Information Provided to the NRC

PG&E's Error Description

From October 22, 2012, through November 8, 2012, the NRC conducted the 2012 Triennial Fire Protection Inspection at Diablo Canyon Power Plant (DCPP). On October 22, 2013, the inspectors asked about the amount of time available to operators to prevent the reactor coolant system (RCS) from going "solid" if RCS letdown spuriously actuates. Pacific Gas and Electric (PG&E) personnel responded as follows:

The most limiting event for rapidly filling the pressurizer to a water-solid condition is analyzed in the DCPP Updated Final Safety Analysis Report (UFSAR), Section 15.2.15, "Spurious Operation of the Safety Injection System at Power." This accident analysis conservatively assumes that a safety injection (SI) signal is spuriously generated while operating at 100 percent power, the Emergency Core Cooling System actuates, RCS letdown isolates, and offsite power is lost.

On October 25, 2013, PG&E further clarified this response with respect to operator action times, but repeated the above paragraph regarding the analysis and UFSAR assumptions.

Subsequently, during efforts to verify DCPP's licensing bases, PG&E's Licensing Bases Verification Project (LBVP) staff asked for clarification of the assumptions used in UFSAR Section 15.2.15. Upon further review, plant staff recognized that the information provided to the NRC during the fire protection inspection was in error. Specifically, neither the accident analysis, nor the UFSAR assume that offsite power is lost during spurious operation of the SI system.

NRC Use of the Incorrect Information

On page 12 of NRC Inspection Report (IR) 05000275/2012008; 05000323/2012008, Section 1R05.05.b.1 correctly states:

The team identified a violation of Technical Specification 5.4.1.d for the failure to implement and maintain adequate written procedures covering fire protection program implementation. Specifically, the team identified five examples (with a total of eight fire scenarios) where the licensee failed to maintain an alternative shutdown procedure that ensured operators could safely shutdown the plant in the event of a control room or cable spreading room fire. This violation has been screened and determined to warrant enforcement discretion in accordance with the NRC Enforcement Policy, Section 9.1, "Enforcement Discretion for Certain Fire Protection Issues (10 CFR 50.48)," and Inspection Manual Chapter 0305.

In Example 4, "Potential Overfilling of the Pressurizer," paragraph 3, on page 15 of the NRC's IR, the NRC included information consistent with what PG&E had provided by stating:

The licensee examined the spurious actuation of the safety injection system in the Final Safety Analysis Report Section 15.2.15. The licensee's analysis assumed the safety injection signal occurred at 100 percent power, the emergency core cooling system actuated, letdown isolated, and offsite power was lost. The licensee concluded that operators had 8.5 minutes to control charging prior to the pressurizer reaching a water solid condition.

This statement in Example 4 was erroneous because it reiterated the assumption that offsite power was lost when, in fact, neither the accident analysis, nor the UFSAR assume that offsite power is lost during spurious operation of the SI system.

Impact of the Incorrect Information

The error (i.e., assuming offsite power was lost) did not correctly convey data found in DCPP's accident analysis and its UFSAR. The NRC repeated this error in its IR; however, this incorrect information was not required for the NRC to evaluate and conclude that a violation of Technical Specification 5.4.1.d had occurred. All analysis results and UFSAR representations continue to be correct. PG&E's characterization of those analysis results and UFSAR representations were in error regarding the assumption of loss of offsite power. Hence, the findings in the report remain correct; however, the statement in the report regarding the misrepresentation should be corrected.

Requested Corrections to the Inspection Report

PG&E believes that it is in the best interests of the NRC and PG&E to ensure that statements made in inspection reports are correct, notwithstanding the absence of an immediate material impact. Therefore, consistent with the above information, PG&E requests the NRC to correct the following statement in NRC IR 05000275/2012008; 05000323/2012008, Section 1R05.05.b.1, Example 4 as shown:

The licensee examined the spurious actuation of the safety injection system in the Final Safety Analysis Report Section 15.2.15. The licensee's analysis assumed the safety injection signal occurred at 100 percent power, the emergency core cooling system actuated, ~~and~~ letdown isolated, ~~and~~ offsite power was lost. The licensee concluded that operators had 8.5 minutes to control charging prior to the pressurizer reaching a water-solid condition.