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June 6, 2013

PG&E Letter DCL-13-057

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

10 CFR 50.90

Diablo Canyon Units 1 and 2
Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
License Amendment Request 13-01
Administrative Revisions to Technical Specifications 3.7.10 and 5.6.5

Dear Commissioners and Staff:

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company (PG&E) hereby requests approval of the enclosed proposed amendment to Facility Operating License Nos. DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant (DCPP) respectively. The enclosed license amendment request (LAR) proposes editorial changes to Technical Specification (TS) 3.7.10, "Control Room Ventilation System (CRVS)," and TS 5.6.5, "CORE OPERATING LIMITS REPORT (COLR)," that are administrative in nature.

The changes in this LAR are not required to address an immediate safety concern. PG&E requests approval of this LAR no later than June 04, 2014. PG&E requests the license amendments be made effective upon NRC issuance, to be implemented within 60 days from the date of issuance.

The enclosure to this letter contains the evaluation of the proposed change. Attachment 1 to the Enclosure provides the existing DCPP TS pages marked up to show the proposed change. Attachment 2 to the Enclosure provides revised, clean-typed DCPP TS pages.

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

In accordance with site administrative procedures and the Quality Assurance Program, the proposed amendment has been reviewed by the Plant Staff Review Committee.



Pursuant to 10 CFR 50.91, PG&E is sending a copy of this proposed amendment to the California Department of Public Health.

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 June 6, 2013.

Sincerely,

Barry S. Allen
Site Vice President

RNTT/4231/SAPN 50353580

Enclosure

cc: Diablo Distribution

cc/enc: Gonzalo L. Perez, Branch Chief, California Department of Public Health
Thomas R. Hipschman, NRC Senior Resident Inspector
Arthur T. Howell, III, NRC Region IV
James T. Polickoski, NRR Project Manager

Evaluation of the Proposed Change

License Amendment Request 13-01

1. SUMMARY DESCRIPTION
2. DETAILED DESCRIPTION
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 - 2.2 Purpose for Proposed Amendment
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ATTACHMENTS:

1. Proposed Technical Specification Changes
2. Revised Technical Specification Pages

EVALUATION

1. SUMMARY DESCRIPTION

This license amendment request (LAR) requests NRC review and approval, in accordance with 10 CFR 50.90, to revise Technical Specification (TS) 3.7.10, "Control Room Ventilation System (CRVS)," and TS 5.6.5, "Core Operating Limits Report (COLR)," to incorporate editorial changes, and to amend Operating Licenses DPR-80 and DPR-82 for Units 1 and 2 of the Diablo Canyon Power Plant (DCPP), respectively.

2. DETAILED DESCRIPTION

2.1 Proposed Amendment

The following footnote (1) to the TS 3.7.10 Condition A Completion Time is deleted:

- (1) The Completion Time that one CRVS train can be inoperable as specified by Required Action A.1 may be extended beyond the 7 day completion time up to 13 days to support repair and restoration of the CRVS actuation instrumentation which required TS 3.7.10 Condition A entry per TS 3.3.7 Required Action B.1.2. Upon completion of the repair and restoration, this footnote is no longer applicable and will expire at 20:38 PST on December 10, 2012.

TS 5.6.5a.4 is revised from:

"Heat Flux Hot Channel Factor, $K(Z)$ and $W(Z) - F_Q(Z)$ (F_Q^{RTP} Specification 3.2.1),"

to

"Heat Flux Hot Channel Factor ($F_Q(Z)$) for Specification 3.2.1,"

TS 5.6.5a.5 is revised from:

"RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$ ($F_{\Delta H}^{RTP}$ and $PF_{\Delta H}$ for Specification 3.2.2),"

to

"Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$) for Specification 3.2.2,"

TS 5.6.5a.9 is revised from:

"RCS pressure and temperature DNB limits in Specification 3.4.1."

to

"RCS Pressure, Temperature, and Flow DNB Limits in Specification 3.4.1."

2.2 Purpose for Proposed Amendment

TS 3.7.10 is revised to delete footnote (1). This footnote is associated with License Amendment (LA) 213/215 that was approved in 2012 (Reference 1) and expired on December 10, 2012. Thus, as of December 11, 2012, the footnote is no longer applicable.

TS 5.6.5 is revised to correct inconsistent wording between TS 5.6.5a.4 and TS 3.2.1, between TS 5.6.5a.5 and TS 3.2.2, and also between TS 5.6.5a.9 and TS 3.4.1. Inconsistent wording between TS 5.6.5a.4 and TS 3.2.1 existed prior to and since improved technical specifications (ITS) conversion associated with LA 135 that was approved in 1999 (Reference 2). Prior to ITS conversion, the title for TS 3/4.2.2 was, "Heat Flux Hot Channel Factor- $F_Q(Z)$." Since ITS conversion the corresponding TS 3.2.1 is, "Heat Flux Hot Channel Factor ($F_Q(Z)$)." As a result, an editorial change is proposed to TS 5.6.5a.4 to provide consistency between the section title of TS 3.2.1 and the section title that is referenced in TS 5.6.5a.4. Inconsistent wording between TS 5.6.5a.5 and TS 3.2.2 was introduced when titles of TS sections were revised, during ITS conversion associated with LA 135 that was approved in 1999 (Reference 2). Prior to ITS conversion, the title for TS 3/4.2.3 was, "RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor." During ITS conversion, the title for the corresponding TS 3.2.2 was reworded as, "Nuclear Enthalpy Rise Hot Channel Factor," since reactor coolant system flow limits are presented in TS 3.4.1. However, TS 5.6.5a.5 was not revised accordingly. As a result, an editorial change is proposed to TS 5.6.5a.5 to provide consistency between the section title of TS 3.2.2 and the section title that is referenced in TS 5.6.5a.5. In addition, inconsistent wording between TS 5.6.5a.9 and TS 3.4.1 was introduced during preparation of the LAR associated with LA 195/196 that was approved in 2007 (Reference 3). As a result, an editorial change is proposed to TS 5.6.5a.9 to provide consistency between the section titles of TS 3.4.1 and the section title that is referenced in TS 5.6.5a.9.

3. TECHNICAL EVALUATION

3.1 Administrative Revisions to Technical Specifications 3.7.10 and 5.6.5

The proposed editorial change to TS 3.7.10 is administrative in nature since it is no longer applicable. The proposed editorial changes to TS 5.6.5 are also administrative in nature. The proposed changes provide consistency between the section titles of TS 3.2.1, TS 3.2.2 and TS 3.4.1 and the section titles that are referenced in TS 5.6.5. The proposed changes do not alter the intent of the TS or the intended operation of the plant.

4. REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The NRC has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14864) of amendments that are considered unlikely to involve significant hazards consideration (Reference 4). Example (i) relates to a purely administrative change to TS: for example, a change to achieve consistency throughout the TS, correction of an error, or a change in nomenclature.

4.2 Significant Hazards Consideration

PG&E has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed editorial changes do not involve any physical changes to structures, systems or components. The proposed editorial change to TS 3.7.10 deletes a footnote that is no longer applicable. The proposed editorial changes to TS 5.6.5 correct administrative discrepancies in the TS to provide consistency with the existing TS Sections 3.2.1, 3.2.2 and 3.4.1. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different accident from any accident previously evaluated?

The proposed editorial changes to TS 3.7.10 and TS 5.6.5 do not involve an accident. Therefore, the proposed change does not create the possibility of a new or different accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

The proposed editorial changes to TS 3.7.10 and TS 5.6.5 do not impact accident analyses, fission product barriers, or margin of safety. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, PG&E concludes that the proposed change does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

4.3 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5. ENVIRONMENTAL CONSIDERATION

PG&E has evaluated the proposed amendment and has determined that the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6. REFERENCES

1. NRC Letter, "Diablo Canyon Power Plant, Unit Nos. 1 and 2 – Issuance of Amendments Re: Revision to Technical Specification 3.7.10, "Control Room Ventilation System (CRVS)," (Emergency Circumstances) (TAC Nos. MF0317 and MF0318), dated December 4, 2012
2. NRC Letter, "Conversion to Improved Technical Specifications for Diablo Canyon Power Plant, Units 1 and 2 – Amendment No. 135 to Facility Operating License Nos. DPR-80 and DPR-82 (TAC Nos. M98984 and M98985)," dated May 28, 1999
3. NRC Letter, "Diablo Canyon Power Plant, Unit Nos. 1 and 2 – Issuance of Amendments Re: Technical Specification (TS) 3.4.1, 'Reactor Coolant System (RCS) Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits' and TS 5.6.5, 'CORE OPERATING LIMITS REPORT (COLR),'" (TAC Nos. MD3979 and MD3980), dated April 17, 2007
4. Federal Register 51 FR 7744, "Final Procedures and Standards on No Significant Hazard Considerations, Final Rule," dated March 6, 1986

Enclosure
Attachment 1
PG&E Letter DCL-13-057

Attachment 1
Diablo Canyon Power Plant
Proposed Technical Specification Changes

3.7 PLANT SYSTEMS

3.7.10 Control Room Ventilation System (CRVS)

LCO 3.7.10 Two CRVS trains shall be OPERABLE.

-----NOTE-----

The control room envelope (CRE) boundary may be opened intermittently under administrative controls.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6.
During movement of recently irradiated fuel assemblies.

ACTIONS

-----NOTE-----

ACTIONS apply simultaneously to both units.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRVS train inoperable for reasons other than Condition B.	A.1 Restore CRVS train to OPERABLE status.	7 days ⁽¹⁾
B. One or more CRVS trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4.	B.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u> B.2 Verify mitigating actions ensure CRE occupant exposures to radiological hazards will not exceed limits, and CRE occupants are protected from smoke and chemical hazards.	24 hours
	<u>AND</u> B.3 Restore CRE boundary to OPERABLE status.	90 days

(continued)

~~(1) The Completion Time that one CRVS train can be inoperable as specified by Required Action A.1 may be extended beyond the 7 day completion time up to 13 days to support repair and restoration of the CRVS actuation instrumentation which required TS 3.7.10 Condition A entry per TS 3.3.7 Required Action B.1.2. Upon completion of the repair and restoration, this footnote is no longer applicable and will expire at 20:38 PST on December 10, 2012.~~

5.6 Reporting Requirements (continued)

5.6.3 Radioactive Effluent Release Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Not Used

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. Shutdown Bank Insertion Limits for Specification 3.1.5,
2. Control Bank Insertion Limits for Specification 3.1.6,
3. Axial Flux Difference for Specification 3.2.3,

Insert #1

4. ~~Heat Flux Hot Channel Factor, $K(Z)$ and $W(Z)$ $F_{\alpha}(z)$ (F_{α}^{RTP} Specification 3.2.1),~~

Insert #2

5. ~~RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$ ($F_{\Delta H}^{RTP}$ and $PF_{\Delta H}$ for Specification 3.2.2),~~

6. SHUTDOWN MARGIN values in Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6, and 3.1.8,
7. Moderator Temperature Coefficient limits in Specification 3.1.3,
8. Refueling Boron Concentration limits in Specification 3.9.1, and

Insert #3

9. ~~RCS pressure and temperature DNB limits in Specification 3.4.1.~~

(continued)

Insert #1:

Heat Flux Hot Channel Factor ($F_Q(Z)$) for Specification 3.2.1,

Insert #2:

Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$) for Specification 3.2.2,

Insert #3:

RCS Pressure, Temperature, and Flow DNB Limits in Specification 3.4.1.

Attachment 2

**Diablo Canyon Power Plant
Revised Technical Specification Pages**

Remove Page

**3.7-18
5.0-19**

Insert Page

**3.7-18
5.0-19**

3.7 PLANT SYSTEMS

3.7.10 Control Room Ventilation System (CRVS)

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APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6.
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A. One CRVS train inoperable for reasons other than Condition B.	A.1 Restore CRVS train to OPERABLE status.	7 days
B. One or more CRVS trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4.	B.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>	
	B.2 Verify mitigating actions ensure CRE occupant exposures to radiological hazards will not exceed limits, and CRE occupants are protected from smoke and chemical hazards.	24 hours
	<u>AND</u>	
	B.3 Restore CRE boundary to OPERABLE status.	90 days

(continued)

5.6 Reporting Requirements (continued)

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5.6.4 Not Used

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Shutdown Bank Insertion Limits for Specification 3.1.5,
 2. Control Bank Insertion Limits for Specification 3.1.6,
 3. Axial Flux Difference for Specification 3.2.3,
 4. Heat Flux Hot Channel Factor ($F_Q(z)$) for Specification 3.2.1,
 5. Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$) for Specification 3.2.2,
 6. SHUTDOWN MARGIN values in Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6, and 3.1.8,
 7. Moderator Temperature Coefficient limits in Specification 3.1.3,
 8. Refueling Boron Concentration limits in Specification 3.9.1, and
 9. RCS Pressure, Temperature, and Flow DNB Limits in Specification 3.4.1.

(continued)
