



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 24, 2013

Mr. Edward D. Halpin  
Senior Vice President and Chief Nuclear Officer  
Pacific Gas and Electric Company  
Diablo Canyon Power Plant  
P.O. Box 56, Mail Code 104/6  
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON POWER PLANT, UNIT NOS. 1 AND 2 – SUPPLEMENTAL  
INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING  
ACTION RE: LICENSE AMENDMENT REQUEST TO ADOPT NATIONAL  
FIRE PROTECTION ASSOCIATION STANDARD 805 (TAC NOS. MF2333  
AND MF2334)

Dear Mr. Halpin:

By letter dated June 26, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML131960159), Pacific Gas and Electric Company (PG&E, the licensee), submitted a license amendment request (LAR) for Diablo Canyon Power Plant, Units 1 and 2 (DCPP). The proposed amendment would enable PG&E to adopt a new fire protection licensing basis for DCPP, which complies with the requirements in paragraphs 50.48(a) and (c) of Title 10 of the *Code of Federal Regulations* (10 CFR). Specifically, DCPP would transition the fire protection program to one based on the National Fire Protection Association Standard 805 (NFPA 805) Performance-Based Standard for Fire Protection For Light Water Reactor Generating Plants (2001 Edition) (ADAMS Accession No. ML010800360). PG&E further requested changes to paragraph C.2.(5) of Facility Operating License No. DPR-80 and paragraph C.2.(4) of Facility Operating License No. DPR-82 that describes how the licensee may make changes to its approved fire protection program without prior approval by the U.S. Nuclear Regulatory Commission (NRC).

The purpose of this letter is to provide the results of the NRC staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with 10 CFR 50.90, an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the NRC staff to make an independent

assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that PG&E supplement the application to address the information requested in the enclosure by October 9, 2013, to enable the NRC staff to complete its acceptance review. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application.

The information requested and associated timeframe in this letter were discussed with Mr. Philippe Soenen of your staff on September 20, 2013.

If you have any questions, please contact me at 301-415-1530 or via e-mail at [Jennivine.Rankin@nrc.gov](mailto:Jennivine.Rankin@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jennivine Rankin". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Jennivine K. Rankin, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

LICENSE AMENDMENT REQUEST TO ADOPT  
NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 805  
PACIFIC GAS AND ELECTRIC COMPANY  
DIABLO CANYON POWER PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-275 AND 50-323

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The NRC staff performed the LAR acceptance review in accordance with Revision 1 of the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-109, "Acceptance Review Procedures" (ADAMS Accession No. ML091810088). The NRC staff has determined that the following information is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

1. Tables W-2 and W-3 of the submittal dated June 26, 2013, present the significant-risk accident sequences for DCPP, Units 1 and 2, respectively, associated with fire scenarios that individually contribute greater than 0.5 percent of the calculated fire core damage frequency (CDF). There are no similar tables provided for large early release frequency (LERF). Please provide listings of all of the fire initiating events that contribute individually greater than 0.5 percent of the calculated LERF for both Units 1 and 2 (similar to Tables W-2 and W-3 for CDF).
2. Table S-2 of the submittal dated June 26, 2013, identifies Modification S-2.3, "Reactor Coolant Pump (RCP) Seal Cooling Modification," which includes installation of Westinghouse SHIELD low leakage RCP seals. The NRC staff understands that PG&E fully intends to install this modification or other compensatory measures in order to achieve the desired plant safety, as documented in the LAR. However, given the recent concerns about the performance of the new Westinghouse RCP seals, the risk reduction credit taken in this application for this modification may be optimistic. Not crediting the RCP

Enclosure

seal cooling modification will likely increase the total CDF and LERF for both units. Please discuss the impact of not crediting the new Westinghouse SHIELD RCP seals on CDF, LERF, delta ( $\Delta$ ) CDF, and  $\Delta$ LERF.

E. Halpin

- 2 -

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If you have any questions, please contact me at 301-415-1530 or via e-mail at [Jennivine.Rankin@nrc.gov](mailto:Jennivine.Rankin@nrc.gov).

Sincerely,

/RA/

Jennivine K. Rankin, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

Enclosure:  
As stated

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**ADAMS Accession No.: ML13266A064**

\*by email

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