



December 29, 2014

PG&E Letter DCL-14-121

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

10 CFR 50.73

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Cancellation of Licensee Event Report 1-2014-001

- References:
1. PG&E Letter DCL-14-026, "Licensee Event Report 1-2014-001-00, Technical Specification 3.4.3, RCS Pressure Limit Violation During Vacuum Refill Due to Human Error," dated March 31, 2014. (ML14090A450)
 2. NRC Letter, Anne T. Boland to Ernest Harkness, "Perry Nuclear Power Plant – Revised Non-Cited Violation 05000440/2013007-01 in NRC Problem Identification and Resolution Inspection Report 05000440/2013007," dated September 3, 2014. (ML14246A151)

Dear Commissioners and Staff:

In Reference 1 above, Pacific Gas and Electric Company (PG&E) submitted a Licensee Event Report (LER) in accordance with 10 CFR 50.73(a)(2)(i)(B) regarding an apparent failure to comply with reactor coolant system (RCS) Pressure and Temperature (P/T) Limits when RCS pressure was below 0 pounds per square inch gauge (psig) during RCS vacuum fill operations.

Regarding a similar apparent violation of Technical Specifications (TS) at Perry Nuclear Power Plant, the NRC concluded in Reference 2 that operation below the 0 psig range shown on the P/T figure did not constitute a violation of TS, since the intent of the figure was to show the minimum temperatures to be maintained at the pressures shown by the P/T curves. Similar to Perry, the Diablo Canyon Power Plant P/T figures show acceptable regions of operation below and to the right of RCS cooldown, heatup, hydrostatic leak test and criticality P/T curves, but do not graphically go below 0 psig.

Accordingly, since a violation of TS did not occur, PG&E is hereby cancelling LER 1-2014-001. This cancellation is consistent with the guidance in NUREG-1022, Revision 3, "Event Reporting Guidelines 10 CFR 50.72 and 50.73."



Document Control Desk
December 29, 2014
Page 2

PG&E Letter DCL-14-121

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Barry S. Allen'.

Barry S. Allen
Site Vice President

JY1E/4609/50669827

cc: Marc L. Dapas, NRC Region IV Administrator
Thomas R. Hipschman, NRC Senior Resident Inspector
Siva P. Lingam, Senior Project Manager
INPO
Diablo Distribution