

## NRR-PMDAPEm Resource

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**From:** Lingam, Siva  
**Sent:** Wednesday, April 08, 2015 8:40 AM  
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**Subject:** Diablo Canyon 1 and 2 - Requests for Additional Information to License Amendment Request associated with Adoption of TSTF-432, Rev. 1 (TAC Nos. MF4521 and MF4522)

Please note the following **official** requests for additional information, and provide your responses by May 1, 2015.

By letter dated July 28, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14209B074), Pacific Gas and Electric Company (PG&E, the licensee) submitted a license amendment request (LAR), which proposed changes to the Technical Specifications (TSs) for Diablo Canyon Power Plant (DCPP), Units 1 and 2. The proposed amendment would modify TSs to risk-inform requirements regarding selected Required Action End States. According to the licensee, the changes are consistent with Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Change Traveler TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)."

Regarding applicable Regulatory Requirements/Criteria requirements for the proposed changes, the licensee states the following in its application:

"A description of the proposed TS change and its relationship to applicable regulatory requirements were published in the Federal Register Notice of Availability on May 11, 2012 (77 FR 27814). PG&E has reviewed the NRC [Nuclear Regulatory Commission] Staff's model SE [safety evaluation] referenced in the CLIP [consolidated line item improvement process] Notice of Availability and concluded that the regulatory evaluation section is applicable to DCP Units 1 and 2."

While working on similar applications, the NRC staff had earlier noticed that a regulatory guidance document used in the staff's regulatory assessments for the end-states related TSTFs and referenced in the staff's model SEs for such TSTFs, had been superseded and therefore, is not a valid guidance for the adoption of the staff's approved TSTFs. The issue concerns the reference to Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," (ADAMS Accession No. ML003699426) in TSTF-432, Revision 1 (ADAMS Accession No. ML103360003) as well as model safety evaluation (ADAMS Accession No. ML120200384) for the TSTF, which states,

"RG 1.182, "Assessing and Managing Risk before Maintenance Activities at Nuclear Power Plants" (Reference 6), provides guidance on implementing the provisions of 10 CFR 50.65(a)(4) by endorsing a revised Section 11 to NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (Reference 7)."

On November 27, 2012, via *Federal Register* Notice 78 FR 70846, the NRC staff informed the industry that RG 1.182 had been withdrawn by the staff since it was determined that the document (RG 1.182) was redundant due to the inclusion of its subject matter in Revision 3 of RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The Notice also stated that withdrawal of RG 1.182 neither altered any prior or existing licensing commitments based on its use, nor constituted backfitting as defined in 10 CFR 50.109 (the Backfit Rule) and was not otherwise inconsistent with the issue finality provisions in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 52.

In addition, the NRC staff observed that RG 1.160 endorsed Revision 4A of the Nuclear Management and Resources Council (NUMARC) 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." NUMARC 93-01 provides methods that are acceptable to the NRC staff for complying with the provisions of Section 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," of Title 10, of the *Code of Federal Regulations*, Part 50, "Domestic Licensing of Production and

Utilization Facilities” (10 CFR Part 50) (Ref. 2). The model SE for the TSTF refers to the guidance in NUMARC 93-01, Section 11, “Assessment of Risk Resulting from Performance of Maintenance Activities,” dated February 22, 2000 (ADAMS Accession No. ML003704489).

Request For Additional Information:

In order to justify adoption of the approved TSTF changes, please confirm that Diablo Canyon’s current licensing basis adheres to the RG 1.160 guidance and commitment to the updated version of NUMARC 93-01.

(For details, you may also refer to the NRC staff’s recent letter dated, February 26, 2015 (ADAMS Accession No. ML15033A152), in response to the TSTF Group’s letter, dated, September 16, 2014 (ADAMS Accession No. ML14259A575), on the subject matter.)

Also, during review of the application, the NRC staff has identified a typo on TS Bases pages 75-86 of 107 and 93-96 of 109 (ADAMS Accession Nos. ML14209B075 and ML14209B079), respectively. The bottom left side of these pages refer to ‘DIABLO CANYON’ as ‘DDIABLO CANYON.’ Please correct the error (acceptable if corrected during implementation of the amendment).

Regulatory Basis

10 CFR 50.90, application for amendment of license, construction permit, or early site permit states:

“Whenever a holder of a license, including a construction permit and operating license under this part, and an early site permit, combined license, and manufacturing license under part 52 of this chapter, desires to amend the license or permit, application for an amendment must be filed with the Commission, as specified in §§ 50.4 or 52.3 of this chapter, as applicable, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.”

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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 1978

**Mail Envelope Properties** (Siva.Lingam@nrc.gov20150408083900)

**Subject:** Diablo Canyon 1 and 2 - Requests for Additional Information to License Amendment Request associated with Adoption of TSTF-432, Rev. 1 (TAC Nos. MF4521 and MF4522)  
**Sent Date:** 4/8/2015 8:39:42 AM  
**Received Date:** 4/8/2015 8:39:00 AM  
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**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	5846	4/8/2015 8:39:00 AM

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**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**