

NRR-PMDAPEm Resource

From: Lingam, Siva
Sent: Tuesday, September 22, 2015 1:15 PM
To: Soenen, Philippe R (PNS3@pge.com)
Cc: Markley, Michael; Weerakkody, Sunil; Keefe, Molly; Schrader, Kenneth (KJSe@pge.com); 'mjrm@pge.com'
Subject: Diablo Canyon 1 and 2 - Requests for Additional Information for License Amendment Request 15-03 to Adopt the Alternative Source Term per 10 CFR 50.67 (TAC Nos. MF6399 and MF6400)

By a letter dated June 17, 2015 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15176A539), as supplemented by letter dated August 31, 2015 (ADAMS Accession No. ML15243A363), Pacific Gas and Electric (PG&E, the licensee), submitted a license amendment request (LAR) to revise the licensing bases to adopt the alternative source term (AST) as allowed by Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.67, "Accident source term." Please note the following **official** requests for additional information (RAIs) from our Probabilistic Risk Assessment Operations and Human Factors Branch (APHB) for the AST LAR, and provide your responses within 30 days from the date of this e-mail. We transmitted the draft RAIs to you on August 18, 2015, for the purpose of any clarification call.

1. Please identify any operator manual actions that will be added, deleted, or changed to support the proposed license amendment. If there are changes to operator actions please include the following information:
 - What cues are provided to personnel that manual action(s) is/are required?
 - What cues are provided to personnel that the proposed action(s) is/are no longer required?
 - What administrative controls exist to assure that, when the action(s) is/are no longer required, the plant configuration is put in the correct configuration for the plant status?
2. Please describe any changes to operating procedures needed to support the proposed license amendment.
3. If the Emergency Operating Procedures are affected, describe any changes that were required of the Control Room task analysis that was done as part of your Detailed Control Room Design Review. If no update to the task analysis was necessary, describe how task requirements were developed.
4. Please describe any changes to controls or displays (including annunciators and alarms) needed to support the proposed license amendment.
5. Please describe any changes to training and the simulator needed to support the proposed license amendment.
6. Please describe any changes to staffing or qualification needed to support the proposed license amendment.
7. What has been or will be done to assure that any new or changed human actions can be done within the time limits of the relevant scenario(s)?
8. Has an operating experience review been done, including plant-specific condition reports, Licensee Event reports, Institute of Nuclear Power Operations (INPO) reports, and other relevant sources?

9. Please describe any increase in operator work load that will occur with the proposed license amendment.
10. Please provide engineering design procedures related to the human factors design of the proposed license amendment, or describe how human factors design is accomplished.
11. Describe the process used to verify and validate the ability of your operators to accomplish the tasks required for the proposed LAR. In lieu of a description, you may provide the relevant administrative procedure(s) for verification and validation. Did the Validation include a representative sample of operators, and was it done with Technical Specification (TS) minimum staffing and nominal staffing?
12. Describe the process used to monitor manual actions to ensure that they remain feasible and reliable over the long term, and are not degraded because of design changes, inadequate training, or other mechanisms.

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Tracking Status: None

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