

## NRR-PMDAPEm Resource

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**From:** Lingam, Siva  
**Sent:** Wednesday, October 07, 2015 2:11 PM  
**To:** Soenen, Philippe R (PNS3@pge.com)  
**Cc:** Markley, Michael; Zimmerman, Jacob; Som, Swagata; Basturescu, Sergiu; 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 Electrical Engineering Branch (EEEE) for the AST LAR. Please provide your responses within 30 days from the date of this e-mail. We transmitted the draft RAIs to you on September 24, 2015, and we had a clarification call on October 7, 2015. Your timely responses will allow the U.S. Nuclear Regulatory Commission staff to complete its review on schedule.

1. Address whether any nonsafety-related systems and components are credited in the accident source term analyses. If so,:  

Describe the independence (electrical and physical separation) of these systems from the safety-related systems. Provide a detailed discussion on why a fault on the non-Class 1E electrical circuit will not propagate to the Class 1E electrical circuit.
2. On page 7 of the LAR, the licensee stated that for the containment spray system no changes in operation are being proposed, other than requiring its operation within 12 minutes following terminating injection spray, instead of being optional in accordance with emergency operating procedures or at the discretion of the Technical Support Center. Does this change in operation require a change to the emergency diesel generators (EDGs) loading sequence?
3. Is there a change of equipment qualification (EQ) profile? If so, provide a list and description of components being added to your Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.49 program due to this LAR. Confirm that these components are qualified for the environmental conditions they are expected to be exposed to. Also, please confirm that the source terms used for EQ of safety-related equipment, and the shielding and vital area access dose rates will continue to be based on assumptions in Technical Information Document [TID]-14844, "Calculation of Distance Factors for Power and Test Reactor Sites."

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**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)

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