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 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
 AUTH. NAME: SHIFFER, J.D. AUTHOR AFFILIATION: Pacific Gas & Electric Co.
 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards Amend Request 84-11 to License DPR-80, revising Tech Spec 3/4, 3.3, 3.6 to include reactor vessel level indication sys in other NUREG-0737 instruments.

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

December 6, 1984

PGandE Letter No.: DCL-84-375

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
License Amendment Request 84-11
Reactor Vessel Level Indication System Technical Specification

Dear Mr. Denton:

PGandE's letter dated November 21, 1984, (DCL-84-355) stated that the Technical Specification change to include the reactor vessel level indication system (RVLIS) would be addressed by December 7, 1984.

Enclosed are 3 signed and 37 conformed copies of an application for an amendment to Facility Operating License No. DPR-80 to add RVLIS to the Accident Monitoring Instrumentation Technical Specification 3/4.3.3.6. This NRC-requested amendment adds RVLIS to the other NUREG-0737 instruments included in 3/4.3.3.6 that provide supplemental indication of a parameter used to monitor and assess those selected plant variables following an accident. However, this Technical Specification change should not be applicable until the RVLIS implementation review is completed by the NRC Staff as indicated in Section II.F.2 of NUREG-0737.

Previous discussions have been held with the NRC Staff on the inclusion of RVLIS in the Technical Specifications. As previously discussed in PGandE's response to Generic Letter 83-37 (Letter DCL-84-134 dated April 5, 1984), PGandE's position is that RVLIS is supplemental instrumentation to the subcooling margin monitor and core exit thermocouples used for evaluating the onset of an inadequate core cooling condition. PGandE believes that because of this function, and because it is not included in or derived from the analyses and evaluation included in the Safety Analysis Report, RVLIS should not be included in the Technical Specifications. PGandE believes this License Amendment Request, as a response to a request from the NRC Staff, represents the best method of responding to Staff concerns while maintaining sufficient operational flexibility to avoid unnecessary plant transients. In the event of inoperability of either RVLIS channel for a significant amount of time, PGandE will report the circumstances and projected remedial actions to the NRC Staff so that the Staff is aware of the projected period of inoperability. Historically, this form of Action Statement has been considered appropriate and has been used for instrumentation, such as RVLIS, which does not have an automatic safety function.

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Mr. H. R. Denton
PGandE Letter No. DCL-84-375
December 6, 1984
Page 2

PGandE also feels that a shutdown requirement related to RVLIS is particularly onerous given the industry concern about operational difficulties that have arisen during the limited operating history for the RVLIS. Portions of a RVLIS are necessarily inaccessible during operation, making repair and maintenance difficult or impossible. We understand that at least one other industry group has made this point concerning a different type of RVLIS. A Technical Specification Action Statement which removes operation flexibility for the RVLIS could unnecessarily increase the number of plant transients.

Pursuant to 10 CFR 170.12(C), an application fee of \$150 is enclosed.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,



Enclosure

cc: J. O. Ward
Service List

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