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50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
AUTH.NAME AUTHOR AFFILIATION
SHIFFER,J.D. Pacific Gas & Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Forwards updated status & schedule for response to Generic Ltr 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events," in response to NRC 850116 request. Response to Items 1-6 of ltr encl.

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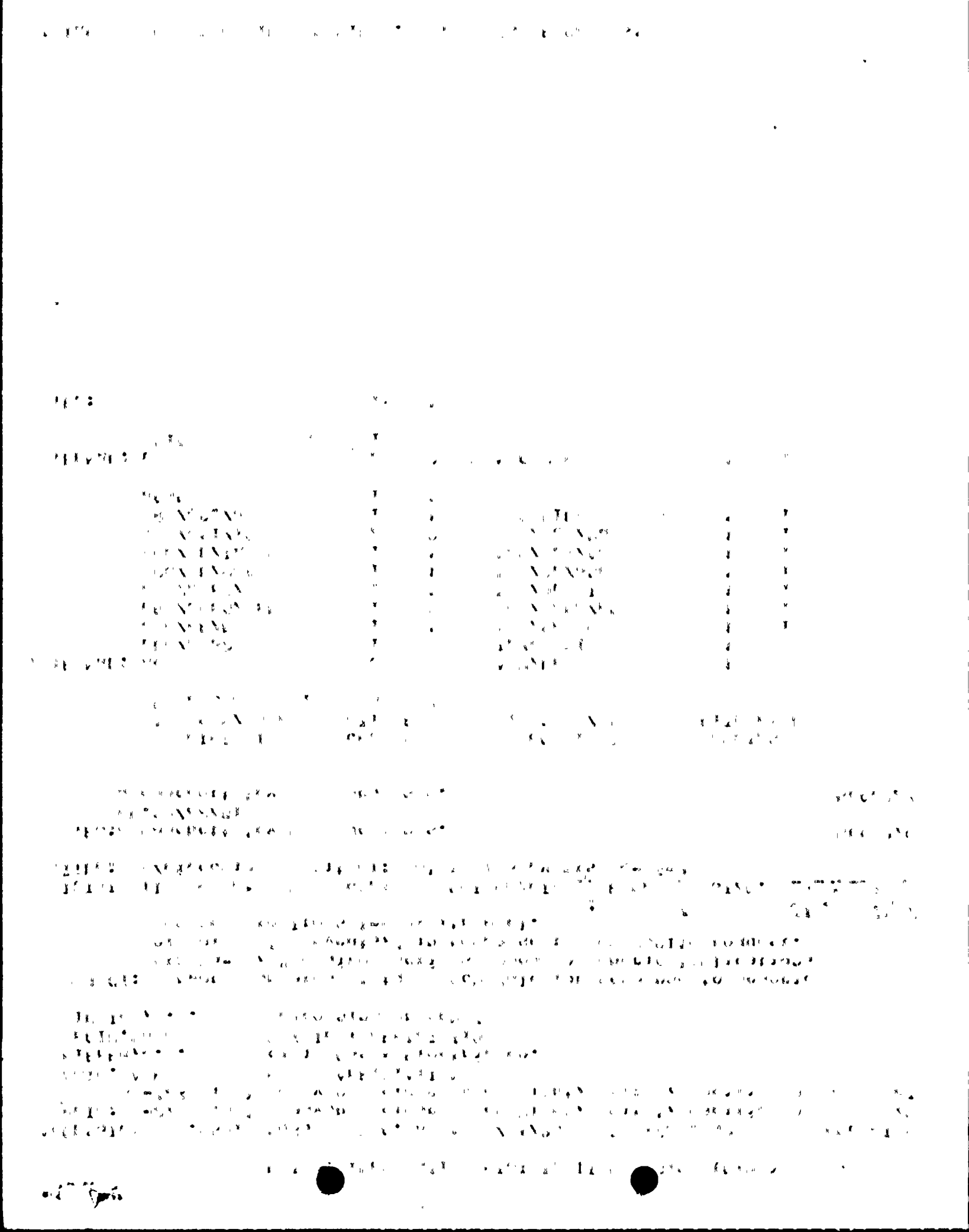

PACIFIC GAS AND ELECTRIC COMPANY

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

January 24, 1985

PGandE Letter No.: DCL-85-025

Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323
Diablo Canyon Units land 2
Updated Status and Schedule for Response to Generic Letter 83-28
and Additional Information

Dear Mr. Knighton:

NRC letter dated January 16, 1985, requested that PGandE provide an update to PGandE's November 7, 1983 status and schedule for all items in Generic Letter 83-28, (GL 83-28) "Required Actions Based on Generic Implications of Salem ATWS Events," for Units 1 and 2. PGandE's updated status and schedule is provided as Enclosure 1.

The January 16, 1985 letter also requested additional information on six items regarding PGandE's implementation of the requirements in GL 83-28. Enclosure 2 provides PGandE's response to items one and six of the NRC January letter. Items two through five will be submitted at a later date, according to the schedule specified in the NRC January letter.

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

Sincerely,

J. D. Shiffer

Enclosures

cc: R. T. Dodds
J. B. Martin
H. E. Schierling
Service List

A055
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ENCLOSURE 1

UPDATED SUMMARY OF STATUS AND SCHEDULE
FOR GENERIC LETTER 83-28 ACTION ITEMS

Action Item No.	Subject	Status		Updated Work Completion Schedule		Comments
		Unit 1	Unit 2	Unit 1	Unit 2	
High Priority Items						
1.1	Post-Trip Review (Program Description And Procedure)	Procedures Complete and Implemented	Procedures Complete, Implementation Prior to Initial Criticality	Additional Information Included in Enclosure 1	Additional Information Included in Enclosure 1	Response was DCL-84-034 (02/01/84). Additional information requested by NRC letter (01/16/85).
2.1	Equipment Classification And Vendor Interface (Reactor Trip System Components)	Rescheduled, Work in Progress	Rescheduled, Work in Progress	04/16/85	Initial Criticality	Completion dates rescheduled as requested by NRC letter (01/16/85).
3.1	Post-Maintenance Testing (Reactor Trip System Components)	Complete	Rescheduled, Work in Progress	N/A	Initial Criticality	Unit 1: Response was DCL-85-002 (01/02/85). Unit 2: Completion date rescheduled as requested by NRC letter (01/16/85).
4.1	Reactor Trip System Reliability (Vendor-Related Modifications)	Complete	Complete	N/A	N/A	
4.2	Reactor Trip System Reliability (Reactor Trip Breakers)					
4.2.1	Periodic Maintenance	Procedures Complete and Implemented, Additional Program Details Being Developed	Procedures Complete, Implementation Prior to Initial Criticality	04/16/85	Initial Criticality	Additional information requested by NRC letter (01/16/85).
4.2.2	Trending of Parameters	Program Complete and Implemented, Additional Program Details Being Developed	Program Complete, Implementation Prior to Initial Criticality	04/16/85	Initial Criticality	Additional information requested by NRC letter (01/16/85).
4.3	Reactor Trip System Reliability	Complete	Complete	N/A	N/A	

UPDATED SUMMARY OF STATUS AND SCHEDULE
FOR GENERIC LETTER 83-28 ACTION ITEMS

Action Item No.	Subject	Status Unit 1	Status Unit 2	Updated Work Completion Schedule Unit 1	Updated Work Completion Schedule Unit 2	Comments
Medium Priority Items						
1.2	Post-Trip Review (Data And Information Capability)	Complete	Complete	N/A	N/A	Response was DCL-84-242 (06/27/84).
2.2	Equipment Classification And Vendor Interface (Safety-Related Components)					
2.2.1	Equipment Classification	Rescheduled, Work in Progress	Rescheduled, Work in Progress	Prior to Startup From First Refueling Outage	Prior to Startup From First Refueling Outage	Completion dates rescheduled as requested by NRC letter (01/16/85).
2.2.2	Vendor Interface	Rescheduled, Work in Progress	Rescheduled, Work in Progress	Prior to Startup From First Refueling Outage	Prior to Startup From First Refueling Outage	Work will be completed on same schedule as Item 2.2.1.
3.2	Post Maintenance Testing (Other Safety-Related Components)	On Schedule, Work in Progress	On Schedule, Work in Progress	06/01/85	06/01/86	No change from 11/07/83 schedule.
4.2	Reactor Trip System Reliability (Reactor Trip Breakers)					
4.2.3	Life Cycle Testing of Breakers	Rescheduled, Work in Progress	Rescheduled, Work in Progress	03/15/85	03/15/85	Rescheduled by DCL-84-365 (11/30/84). Dependent on receiving test results from WOG by 02/15/85.
4.2.4	Periodic Replacement of Breakers or Components	Rescheduled, Work in Progress	Rescheduled, Work in Progress	03/15/85	03/15/85	Rescheduled by DCL-84-365 (11/30/84). Dependent on receiving test results from WOG by 02/15/85.

UPDATED SUMMARY OF STATUS AND SCHEDULE
FOR GENERIC LETTER 83-28 ACTION ITEMS

Action Item No.	Subject	Status		Updated Work Completion Schedule		Comments
		Unit 1	Unit 2	Unit 1	Unit 2	
4.5	Reactor Trip System Reliability (System Functional Testing)					
4.5.1	On-line Functional Testing	Procedures Complete and Implemented	Procedures Complete, Implementation Prior to Initial Criticality	Additional Information Included in Enclosure 1	Additional Information Included in Enclosure 1	Responses were DCL-84-241 (6/27/84) and DCL-84-347 (11/07/84). Additional information requested by NRC letter (01/16/85).
4.5.3	On-line Functional Testing Intervals	Awaiting NRC Approval of WCAPs	Awaiting NRC Approval of WCAPs	Thirty Days After NRC Approval of WCAPs	Thirty Days After NRC Approval of WCAPs	NRC currently reviewing WCAP-10271 and WCAP-10271, Supplement 1, on this subject.

ENCLOSURE 2

DIABLO CANYON UNITS 1 AND 2
RESPONSE TO NRC JANUARY 16, 1985 REQUEST FOR ADDITIONAL INFORMATION
ON GENERIC LETTER 83-28

A. NRC Request, Item 1

Item 1.1 requests specific details concerning a post-trip review program. The PG&E response of February 1, 1984 only references a procedure. PG&E needs to provide a description of the program in response to Items 1.1.1, 1.1.2, 1.1.3, 1.1.4, 1.1.5, 1.1.6, and also provide a copy of the procedures in response to Item 1.1.7. Since the staff considers Item 1.1 to be one of the higher priority items in Generic Letter 83-28, which was issued in July 1983, the description and procedures should be provided prior to initial criticality for Unit 2 and within 90 days for Unit 1.

PGandE Response

Item 1.1.1:

The criteria for determining the acceptability of restart is specified in Diablo Canyon Procedure NPAP A-100 S1, "Administrative Program to Control the Return to Power After a Reactor Trip,". This procedure has three parts: the identification and recording of the reactor trip transient data, the analysis and safety assessment of reactor trip transient data, and the reactor trip recovery. In the first two parts of the procedure, significant primary and secondary side parameters are examined and analyzed to determine if any safety limits are exceeded, if core damage has been indicated, or if the cause of the trip remains unknown. If any of these situations exist, or if the shift foreman indicates that the return to power may endanger the health and safety of the general public, then further analysis and Plant Staff Review Committee (PSRC) approval is required prior to reactor restart. Barring any of these

circumstances, with the approval of the Plant Superintendent, and with the presence of a plant nuclear engineer or shift technical advisor (STA) and an individual with a senior operator license (SOL), the shift foreman can restart the reactor.

Item 1.1.2:

The responsibilities and authorities of personnel who would perform the review and analysis of reactor trips are clearly identified in NPAP A-100 S1. All data acquisition is performed by an individual with an operator license (OL) or a SOL. The shift foreman, STA, and plant engineer review this data. The decision to restart the reactor is made by the shift foreman with the approval of the Plant Superintendent or his delegate.

Diablo Canyon Procedure NPAP A-100, "General Authorities and Responsibilities of Nuclear Plant Operators," further delineates plant operators' responsibilities.

Item 1.1.3:

The qualifications and training of individuals with OLs and SOLs are defined by the NRC. The presently qualified STAs exceed the requirements for the position and most have SOLs. The shift foremen and the Plant Superintendent have OLs or SOLs. Plant nuclear engineers are college graduates in technical disciplines; some also possess operator licenses and/or professional registration.

Item 1.1.4:

The main plant sources of information used to conduct the post-trip review are the main annunciator and the P-250 plant computer typewriters. Both provide a sequence of events printout. In addition, the parameters required by NUREG-0737, Supplement 2, are available on the emergency response facility data system (ERFDS). PGandE's response to Item 1.2 (DCL-84-242, dated June 27, 1984) details the data and information capability of these systems.

Item 1.1.5:

The "Preliminary Safety Assessment" section in NPAP A-100 S1, Part B, compares the event information with expected plant behavior.

Item 1.1.6:

The criteria for determining the need for an independent assessment of the event prior to restart is included in the "Identification of Need for Followup Analysis" section in NPAP A-100 S1, Part B. The PSRC must approve the restart if followup analysis is required.

NPAP A-100 S1 specifies that transient data records be identified and retained if deemed pertinent by the shift foreman, STA, or plant nuclear engineer. Plots of plant parameters deemed pertinent to the transient are attached to the Reactor Trip Review Sheet, and the package is permanently stored in the Records Management System.

Item 1.1.7:

Diablo Canyon Procedures NPAP-A-100 and NPAP-A-100 S1 are provided as Attachments 1 and 2, respectively. These procedures provide the detail for the answers to Items 1.1.1, 1.1.2, and 1.1.4 - 1.1.6. Item 1.1.3, which discusses qualifications and training of personnel, is addressed solely in the preceding text.

B. NRC Request, Item 6

For Item 4.5.1, PG&E needs to state that on-line functional testing of the reactor trip system, including independent testing of the undervoltage and shunt trip features, is being performed. The PG&E response of November 7, 1983, commits to submitting a statement by July, 1984, regarding completion of this item. PG&E submitted a followup response to this item on June 27, 1984. However, the followup response addresses functional testing of the undervoltage and shunt trip features, not the on-line functional testing as indicated in the November 7, 1983, response. PG&E should submit a statement confirming on-line functional testing for Item 4.5.1 prior to startup from the first refueling outage for Unit 1 and Unit 2.

PGandE Response

PGandE performs functional testing for the reactor trip system, including independent testing of the undervoltage and shunt trip features, in Modes 5 and 6. This is consistent with Unit 1 Technical Specifications, Tables 4.3-1 and 4.3-2, which require that the functional test be performed on a normal refueling basis. In addition, on-line, independent, functional testing of the undervoltage and shunt trip features is performed in Modes 1 through 4, after maintenance, in accordance with STP I-33C. This procedure has been used to test these features for Unit 1 and will be implemented for Unit 2 prior to initial criticality. STP I-33C provided as Attachment 3.

Attachments

ATTACHMENT 1

Diablo Canyon Procedure

NPAP A-100

"General Authorities and Responsibilities

of Nuclear Plant Operators"