APR 15 1985

Docket No. 50-323

Mr. J. D. Shiffer, Vice President
Nuclear Power Generation
c/o Nuclear Power Generation, Licensing
Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

Dear Mr: Shiffer:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION IN REGARD TO DIABLO CANYON, UNIT 2 TECHNICAL SPECIFICATIONS

As a result of our continuing evaluation of the Diablo Canyon, Unit 2 Technical Specifications, we find that additional information, identified in the enclosure, is required to complete our review. The items in the enclosure are numbered as additions to the items in the enclosure to our letter of March 14, 1985.

Sincerely,

ORIGINAL SIGNED BY

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

Enclosure:
As stated

cc: See next page

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7. Table 3.8-2, Reactor Trip System Instrumentation Response Times

(Page 3/4-3 and Page B2-4)

In table 3.3-2, it is stated that the need to specify a response time for both the Intermediate Range and Source Range Neutron Flux Trip is "not applicable." Based on previous reviews, we understand that this is because they are claimed not to be taken credit for in safety analyses. However, on page B2-4, it is stated that they are relied upon. Therefore, provide response times, consistent with the need for a power range neutron flux response time.

8. Table 3.3-3, Engineered Safety Features Actuation Systems Instrumentation

(Pages 3/4-15 to 3/4 3-17)

a). We understand that Item 1.C, Automatic Safety Injection is required in Mode 4 on high containment pressure in order to protect the core in the event of a LOCA. The same comment applies to table 4.3-2, item 1.C.

b). Item 4.a, manual steam line isolation capability should be required in Mode 4 to enable isolation of the faulted steam generator in case of a steam line break or a steam generator tube rupture.

9. Section 3.4.4, Relief Valves (Page 3/4 4-10)

We understand that Diablo Canyon Unit 2 relies on the PORVs to be operable and available in order to meet the 10 CFR 100 guideline values. However, the proposed technical specifications would allow them to be taken out of

service and put in an inoperable mode. It is unclear if the action statements (a) through (e) of this section ensure that a PORV relief path will always be operable assuming a single failure. In particular, if a plant lost 2 PORVs, one can not be taken out of service and rendered inoperable, since a single failure of a PORV would result in no pressure relief path and a violation of the FSAR assumptions for the postulated steam generator tube rupture event. Clarify the action statements to ensure that licensing bases are met or otherwise provide a basis for a conclusion that the licensing bases will be met.

10. Section 3/4 10.3, Special Test Exceptions, Reactor Coolant Loops (Page 3/4 10-4)

This technical specification permits plant operation without any reactor coolant pumps operating up to 10% thermal power on fission heat for startup or physics tests. The staff is unaware of any safety analysis that demonstrates that this operating condition would be acceptable. Provide a basis for the acceptability of steady state operation at 10% thermal power on fission heat that includes an assessment of reactor coolant system temperature profiles, margins to saturation, and core DNBR.

ENCLOSURE

DIABLO CANYON UNIT 2

INFORMATION REQUEST

6. Table 3.3-1, Reactor Trip System Instrumentation (Page 3/4 3-2)

Item 6.c on this table specifies that only one Source Range Monitor (SRM) channel is required to be operable during Modes 3, 4, and 5. During these modes, the SRM does not provide a reactor trip function. However, it provides a boron dilution mitigation function by sensing the neutron flux increase and actuating alarms alerting the operator. One operable SRM represents a single point of vulnerability for the boron dilution mitigation system (BDMS). During the FSAR review stage, the staff reviewed and the BDMS on the premise that it is single failure proof. Therefore, this item represents an apparent deviation from the boron dilution analysis assumptions as approved by the staff.

We note that the BDMS as reflected in the Diablo Canyon Unit 2 Technical Specifications does not meet the single failure criterion.

Either (a) propose appropriate changes to rendering the BDMS single failure proof, or (b) provide justification for not meeting the single failure criterion.