PACIFIC GAS AND ELECTRIC COMPANY

November 5, 1985

PGandE Letter No.: DCL-85-339

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
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Comments on Draft NUREG-1032, "Evaluation of Station Blackout Accidents at Nuclear Power Plants", May 1985

Dear Mr. Denton:

Pacific Gas and Electric Company (PGandE) is a member of the Nuclear Utility Group on Station Blackout (NUGSBO) and the Westinghouse Owners Group (WOG). Both of these organizations will be submitting comments on NUPEG-1032. PGandE endorses and supports both of these industry efforts. Additionally, PGandE wishes to provide general comments on the subject NUREG, followed by concerns directly applicable to Diablo Canyon.

As described in the NUREG and WASH-1400, the station blackout (SBO) event is relatively important to the total risk from nuclear plant accidents. However, the total risk has been found to be acceptably small. Furthermore, the NUPEG screening process has not identified any nuclear plant requiring immediate action. Based on this, PGandE believes that potentially expensive backfits for the SBO event cannot be justified.

One of the sources (NSAC/80) in the subject NUPEG indicates that half of the U.S. nuclear sites have never experienced a loss of offsite power (LOOP) event, and the majority of LOOP events have occurred at only a few nuclear plants. The plants that experienced the majority of LOOP events have taken effective action to reduce their susceptibility to the loss of offsite power. This leads to the conclusion that generic rulemaking is unnecessary. However, the NRC did not use the NSAC/80 data, but instead extrapolated specific problems at only a few plants to include all plants.

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There is no strong argument for the applicability of the NUREG's assumptions to other plants; specifically Diablo Canyon. Two examples illustrate this point. First, the annual mean number of days with severe weather conditions, such as tornadoes and ice storms, at west coast sites is zero (DCPP FSAR Update Section 2.3.1.3). Extrapolating meteorological LOOP histories from New England or southern Florida to the west coast is overextending the data. Second, during startup testing Diablo Canyon Unit 1 demonstrated its design capability for handling a net load rejection transient and still maintain house loads. Hence a LOOP event at Diablo Canyon does not necessarily result in dependence on the emergency ac power sources. This feature, which reduces the core damage frequency, was not considered in the subject NUREG.

A critical factor in the plant response to SBO is integrity of the reactor coolant pump (RCP) seals. For Westinghouse plants, including Diablo Canyon, substantial analytical and experimental evidence now exists to rule out large seal leakage rates under long term SBO conditions. This evidence, also under current NRC cooperative development and review, should be considered in an evaluation of SBO events.

In summary, PGandE is in agreement with the conclusions of the NUGSBO and WOG LOOP reports that SBO should be considered an acceptably low risk. This is especially true at plants such as Diablo Canyon. The SBO evaluation should not be based on isolated data and extrapolated into a generic issue. Because of plant specific features and the latest evidence on RCP seal leakage, PGandE believes that the backfits that could result from the NUREG-1032 evaluation will not significantly improve the margin of safety that already exists for protecting the public health and safety. Generic rulemaking on SBO should follow industry initiatives.

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

Sincerely,

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