PACIFIC GAS AND ELECTRIC COMPANY

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

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REGION V

July 15, 1986

PGandE Letter No.: DCL-86-196

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
Temporary Relief from Technical Specification 18-Month Surveillance Calibration Interval for Reactor Coolant Pressure Wide Range Channels

Dear Mr. Martin:

PGandE requests that enforcement discretion be used to grant a one-time relief from Technical Specification 3/4.3.3.6, Table 4.3-7, Item 4, 18-month channel calibration surveillance interval requirement for Unit 1 reactor coolant wide range pressure transmitters PT-403 and PT-405. The channel calibrations of PT-403 and PT-405 were last performed on October 5, 1984, and October 7, 1984, respectively. The 18-month interval plus the 25 percent allowable extension provided by Technical Specification 4.0.2 expires on August 24, 1986, for PT-403 and on August 26, 1986, for PT-405. The channel calibration of PT-403 and PT-405 cannot be performed with the reactor operating because of radiological exposure considerations. In order to meet PGandE electrical system demand, the Unit 1 first refueling outage is scheduled to begin August 29, 1986, and PGandE requests a 30-day extension beyond that allowed by Technical Specification 4.0.2 so that this surveillance can be performed prior to entering Mode 4 for the Unit 1 refueling outage.

If Unit 1 is brought to Mode 3 prior to the scheduled initiation of the refueling outage, the channel calibrations will be performed on PT-403 and PT-405 and this relief will not be necessary.

This request for relief has been reviewed by PGandE and is considered not to involve significant safety or environmental concerns. Further, there is

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reasonable assurance that the health and safety of the public will not be endangered by the proposed change. Information supporting these conclusions is provided in the enclosure.

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

Sincerely,

for J. D. Shiffer

Enclosure

cc: L. J. Chandler
H. R. Denton
M. M. Mendonca
B. Norton
H. E. Schierling
S. A. Varga
J. O. Ward
CPUC
Diablo Distribution

0929S/0046K/DJH/683

ENCLOSURE

ONE-TIME RELIEF FROM 18-MONTH TECHNICAL SPECIFICATION SURVEILLANCE CALIBRATION INTERVAL DURING THE INITIAL OPERATIONAL CYCLE

A. DESCRIPTION OF RELIEF REQUEST

This relief request proposes one-time relief to provide a 30-day extension of the 18-month channel calibration surveillance interval for Technical Specification 3/4.3.3.6, Table 4.3-7, Item 4, "Reactor Coolant Pressure - Wide Range" for Unit 1 so that this surveillance can be performed upon entering Mode 3 for the Unit 1 refueling outage.

B. JUSTIFICATION

In Generic Letter 83-27, "Surveillance Intervals in Standard Technical Specifications," the NRC stated that infrequent, one-time-only changes of 18-month surveillance intervals may be granted for specific conditions when adequate justification is given. PGandE is requesting a one-time extension, for a maximum of 30 days, of the 18-month surveillance calibration interval for the Unit 1 reactor coolant pressure wide range channels PT-403 and PT-405. The channel calibration of PT-403 and PT-405 cannot be performed with the reactor operating because of radiological exposure considerations, and therefore is usually performed during a refueling outage.

Since refueling outages normally occur about every 18 months, extension beyond the 18-month surveillance interval is usually not necessary. However, due to the extended length of the Unit 1 startup program, power ascension program, and cycle 1 operation, PGandE would be forced to shut down prior to the scheduled start of the first refueling outage to satisfy the surveillance interval.

The channel calibrations on PT-403 and PT-405 were last performed on October 5, 1984, and October 7, 1984, respectively. The 18-month interval plus the 25 percent allowable extension provided by Specification 4.0.2 expires on August 24, 1986, for PT-403 and on August 26, 1986, for PT-405. A channel functional test as required by Technical Specification 4.4.9.3.1.a was conducted for PT-403 on April 28, 1986, and for PT-405 on May 26, 1986, which demonstrated the instrument channel loop to be operable. The Unit 1 first refueling outage is scheduled to begin August 29, 1986.

The reactor coolant pressure wide range channels provide indication and do not input to the reactor protection system or engineered safety features actuation system. However, PT-403 and PT-405 do provide input to the subcooling margin monitor, the reactor vessel level indication system, the residual heat removal interlock, and the low temperature overpressure protection (LTOP) system.

Operability of the RHR interlock and the LTOP system is required in Modes 4 through 6. Prior to entering Mode 4, the pressure channels will be calibrated. Backup methods are available to monitor the pressure data normally measured by the wide range pressure indicator, subcooling margin monitor, and reactor vessel level indication system. Therefore, the function of the pressure channels is not adversely affected.

A monthly channel check is performed on PT-403 and PT-405. The narrow range pressurizer channels are used by the reactor protection system and engineered safety feature actuation system. These channels' calibration will be current during the 30-day extension period. Between August 24 and the refueling outage, the frequency of the channel check for PT-403 and PT-405 will be increased to a daily check and their output compared with the narrow range reactor coolant system pressure channels to ensure the channels are functional. Also, if Unit 1 is brought to Mode 3 before the scheduled refueling outage, the channel calibration will be performed on PT-403 and PT-405.

C. SAFETY AND ENVIRONMENTAL EVALUATION

PGandE has evaluated the safety and environmental considerations involved with the proposed relief request and determined that granting of the relief does not present an undue risk to the public health and safety.

The proposed relief request does not affect equipment required for normal operation. The consequences of a previously analyzed FSAR Chapter 15 accident will not be increased since no credit was taken for the reactor coolant system wide range pressure channels in any accident analysis. There are backup methods for determining the pressure information provided to the subcooling margin monitor and the reactor vessel level indication system should it be necessary. Therefore, this relief would not significantly increase the probability or consequences of an accident previously evaluated.

The proposed relief request does not necessitate physical alteration of the plant or changes in parameters governing normal plant operation, therefore there are no new or different kinds of accidents.

The extension of time to perform the surveillance calibration would be 30 additional days beyond that allowed by the Technical Specifications including the allowed extension of Specification 4.0.2. Since there are backup methods that provide similar information, and reactor coolant pressure wide range channels will be channel checked daily to demonstrate functionality, there is no significant reduction in a margin of safety. Therefore, the proposed relief would not cause a significant reduction in a margin of safety.

PGandE has determined that this relief will not affect the environmental analysis in the FSAR Update, Environmental Report, or Final Environmental Impact Statement since the relief would involve no significant increase in the amounts, and no significant change in the types of effluents that

may be released offsite. Further, there is no significant increase in indiviudal or cumulative occupational radiation exposure. Therefore, there are no unreviewed environmental questions involved.

D. SAFETY CONSIDERATION DETERMINATION

Based on the above safety and environmental evaluation, PGandE concludes that granting of this relief will not place the plant in an unsafe condition since the request does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, does not involve a significant reduction in a margin of safety, and does not involve any unreviewed environmental question.