

ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
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 PACIFIC GAS AND ELECTRIC COMPANY)
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 Diablo Canyon Power Plant)
 Units 1 and 2)
)

Docket No. 50-275
Facility Operating License
No. DPR-80

Docket No. 50-323
Facility Operating License
No. DPR-82

License Amendment Request
No. 89-14

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company (PG&E) hereby applies to amend its Diablo Canyon Power Plant (DCPP) Facility Operating License Nos. DPR-80 and DPR-82 (License).

The proposed change amends the Technical Specifications (Appendix A of the Licenses) as regards Technical Specification 4.0.2 and associated Bases.

Information on the proposed change is provided in Attachments A and B.

This change has been reviewed and is considered not to involve a significant hazards consideration as defined in 10 CFR 50.92 or require an environmental assessment in accordance with 10 CFR 51.22(b). Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes.

Subscribed to in San Francisco, California this 16th day of November 1989.

Respectfully submitted,

Pacific Gas and Electric Company

By J. D. Shiffer
J. D. Shiffer
Vice President
Nuclear Power Generation

Howard V. Golub
Richard F. Locke
Attorneys for Pacific
Gas and Electric Company

Subscribed and sworn to before me
this 16th day of November 1989

By Richard F. Locke
Richard F. Locke

Adriane D. Tolefree
Adriane D. Tolefree, Notary Public
for the County of Alameda,
State of California

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My commission expires December 22, 1992.



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November 16, 1989

cc: E. Bailey
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Diablo Distribution

Enclosure

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Attachment A

REVISION OF TECHNICAL SPECIFICATION 4.0.2 AND ASSOCIATED BASES REMOVAL OF THE 3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specification (TS) 4.0.2 by removing the requirement that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. Additionally, this LAR proposes to modify the associated TS Bases.

The change to the TS of Operating License Nos. DPR-80 and DPR-82 is noted in the marked-up copy of the applicable TS (Attachment B).

B. BACKGROUND

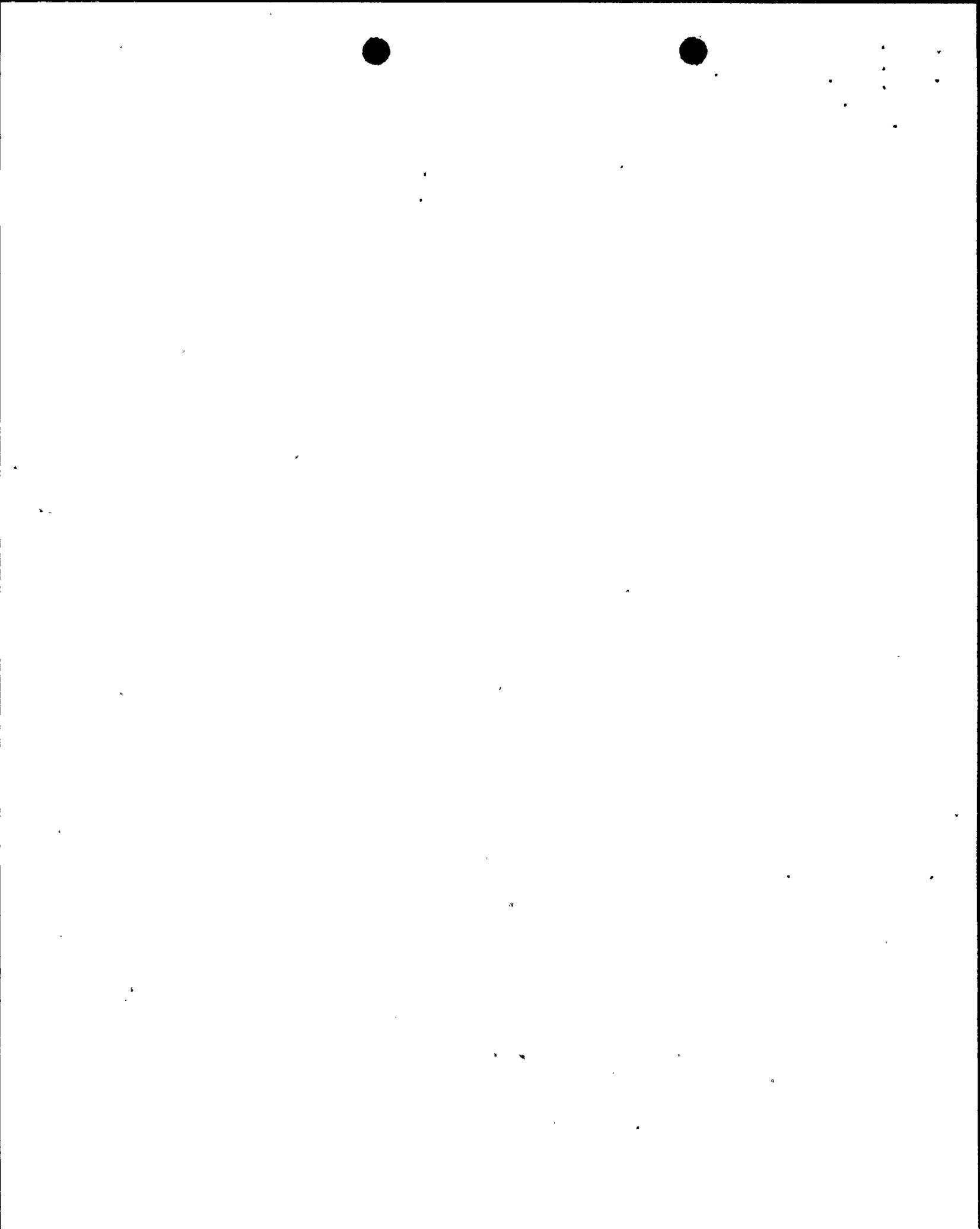
Technical Specification 4.0.2 permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates scheduling activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive time intervals shall not exceed 3.25 times the specified surveillance interval. On August 21, 1989, the NRC issued Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals". The Generic Letter concluded that removal of the 3.25 limit from Specification 4.0.2 results in a greater benefit to safety than limiting the use of the 25 percent allowance to extend surveillance intervals.

C. JUSTIFICATION

This LAR is consistent with the guidance of Generic Letter 89-14. Approval of the LAR will provide the following benefits:

1. Facilitates scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not conducive to the safe conduct of a surveillance.
2. Reduces the potential for unnecessary forced shutdowns to perform surveillance activities.
3. Eliminates the administrative and logistical burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit.
4. Minimizes the need for surveillance interval extension LARs.

An added benefit would exist with the advent of scheduling longer fuel cycles (greater than 18 months), which would improve unit availability, fuel utilization, and reduce shutdowns. Elimination of the 3.25 criterion would allow 22.5 month intervals between fuel cycles.



D. SAFETY EVALUATION

Many surveillances have a specified surveillance interval of 18 months. Generally, an 18-month surveillance interval is intended to allow the surveillance to be performed when the unit is shutdown during a refueling outage. Therefore, the actual time interval for the performance of these surveillances is dependent on the length of a fuel cycle, but it cannot exceed 18 months plus the 25 percent allowance. The safety benefit of performing these surveillances during a plant shutdown is that systems do not have to be removed from service at a time that they are required to be operable. This minimizes the amount of time that systems are unavailable during power operation due to surveillance requirements, thereby minimizing the impact on safety. In a few instances, the TS specifically require some surveillances to be performed during a plant shutdown. When a limit is reached on extending an 18-month interval, a forced plant shutdown to perform these surveillances is generally the only alternative short of a license amendment that defers the performance of these surveillances until the end of a fuel cycle.

Usually, the length of a fuel cycle would not exceed 18 months by more than the 25 percent allowance, i.e., 4-1/2 months. A more common situation has been to encounter the 3.25 limit on the combined time interval for three consecutive surveillance intervals. The NRC staff has normally approved one-time amendment requests to waive the performance of 18-month surveillances until the end of the fuel cycle when they would exceed the 3.25 limitation on consecutive surveillances yet would not exceed the 25 percent allowance for extending the 18-month surveillance interval. A forced shutdown to perform these surveillances is not justified from a risk standpoint to avoid exceeding the 3.25 limit when extending these surveillances is within the 25 percent allowance. The 18-month surveillances are normally performed during a refueling outage when the plant is in a desirable condition for conducting these surveillances. As stated in the NRC's Safety Evaluation for Commonwealth Edison's LaSalle Station, the risk of performing some of these surveillances during plant operation has been determined to be greater than the impact on safety of exceeding the 3.25 limit.

In addition to its application to refueling outage surveillances, the use of the 25 percent allowance for extending surveillance intervals can provide a safety benefit when it is used during plant operation. When plant conditions are not suitable for the conduct of surveillances due to safety systems out-of-service for maintenance or due to other ongoing activities, safety is enhanced by the use of the allowance that permits a surveillance interval to be extended. In such cases, the safety benefit of extending a surveillance interval up to 25 percent would exceed the risk reduction derived by conforming to the 3.25 limitation.

In summary, based on the above considerations, the removal of the 3.25 limit will have an overall positive impact on the safe operation of DCPD Units 1 and 2. PG&E believes there is reasonable assurance that the proposed change will not adversely affect the health and safety of the public.



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E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazard considerations involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

Deletion of the 3.25 extension limitation will not significantly affect equipment reliability and does not affect the probability or consequences of accidents previously evaluated in the FSAR Update. The surveillance interval will still be constrained by the 25 percent interval extension criterion of TS 4.0.2. The risk involved with the alternative to perform 18-month surveillances during plant operation is greater than the risk involved with exceeding the 3.25 limit. When plant conditions are not conducive for the safe conduct of surveillances due to safety systems being out-of-service for maintenance or due to other ongoing surveillance activities, safety is enhanced by the use of the allowance that permits a surveillance interval to be extended.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed revision to the TS will not result in any physical alteration to any plant system, nor would there be a change in the method by which any safety related system performs its function.



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Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

Deletion of the requirement that any three consecutive surveillance intervals shall not exceed 3.25 times the interval will not significantly affect equipment reliability, rather it will reduce the potential to interrupt normal plant operations due to surveillance scheduling. This proposed exemption will allow all surveillance intervals to be constrained by the maximum allowable extension of 25 percent of the specified surveillance interval, which may enhance safety when used during plant operation.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PG&E concludes that the activities associated with this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.

