

ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
PACIFIC GAS AND ELECTRIC COMPANY)
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. 91-01

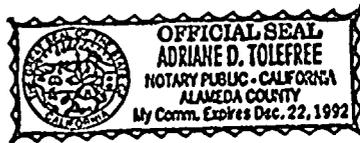
Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company (PG&E) hereby applies to amend its Diablo Canyon Power Plant (DCPP) Facility Operating License Nos. DPR-80 and DPR-82 (Licenses).

The proposed change amends the Technical Specifications (Appendix A of the Licenses) as regards the revision of Technical Specification 3/4.6.2.3 and Bases 3/4.3.1 and 3/4.3.2.

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

This change has been reviewed and is considered not to involve a significant hazards consideration as defined in 10 CFR 50.92 or an unreviewed environmental question. 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 18th day of March 1991.



Respectfully submitted,
Pacific Gas and Electric Company

By J. D. Shiffer
J. D. Shiffer
Senior Vice President and
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Gas and Electric Company

By Richard F. Locke
Richard F. Locke

Subscribed and sworn to before me
this 18th day of March 1991

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

5165S/0085K

My commission expires December 22, 1992.

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions.

2. It then goes on to describe the various methods used to collect and analyze data.

3. The next section covers the challenges faced by researchers in this field.

4. Finally, the document concludes with a summary of the key findings and recommendations.

Attachment A

REVISION OF TECHNICAL SPECIFICATION 4.6.2.3 REVISE REQUIREMENT TO VERIFY THE CONTAINMENT FAN COOLER UNIT DAMPERS TRANSFER FROM THE NORMAL TO THE ACCIDENT POSITION

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specification (TS) 4.6.2.3 by making it cycle specific for the proposed change to the containment fan cooler unit (CFCU) dampers. TS 4.6.2.3 would remain the same for Unit 1 Cycle 5 and Unit 2 Cycle 4. The requirements for verifying the dampers transfer to the accident position would be removed from TS 4.6.2.3 for Unit 1 Cycle 6 and Unit 2 Cycle 5. This verification requirement would no longer be necessary since the dampers will be secured in position following the proposed change. See Attachment C for diagrams of the airflow paths.

Bases 3/4.3.1 and 3/4.3.2 are revised to reflect the change to TS 4.6.2.3.

B. BACKGROUND

The Containment Fan Cooler System (CFCS) is part of the Containment Heat Removal System (CHRS). The purpose of this system is to limit containment ambient temperature during normal plant operating conditions and reduce the containment ambient temperature and pressure following a postulated Loss of Coolant Accident (LOCA) or steam line break. The CHRS consists of two diverse and separate, full capacity engineered safety features; the Containment Spray System and the CFCS. The CFCS supplements the Containment Spray System to reduce the containment ambient pressure and temperature during these events. While performing this cooling function, the containment heat removal system also reduces the driving force for potential leakage of fission products from the containment atmosphere in the event of a breach in containment integrity by reducing the pressure differential between containment and the outside atmosphere.

The present configuration of the CFCS at DCPD consists of five fan coolers, each including moisture separators, high efficiency particulate air (HEPA) filters, cooling coils, direct drive fans, normal and accident air flow dampers, backdraft and pressure relief dampers, distribution ductwork, and associated controls. During normal operation of the units, air is drawn through the cooling coils, cooled, then discharged and distributed back through the ductwork to the containment atmosphere. During post accident operation, air is drawn through a post accident flow path including accident air flow dampers, moisture separators, HEPA filters, and cooling coils, and is discharged by the fan through the backdraft damper into the distribution ductwork.

The HEPA filters and moisture separators at DCPD were originally included in the CFCU design in order to support the use of charcoal



1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for ensuring the integrity of the financial system and for providing a clear audit trail. The text notes that without proper record-keeping, it would be difficult to identify and prevent fraud or errors.

2. The second part of the document focuses on the role of technology in modern accounting. It highlights how software solutions have revolutionized the way businesses manage their finances, allowing for faster processing and more accurate reporting. The text also mentions the importance of data security and the need for robust backup systems to protect sensitive financial information.

3. The third part of the document addresses the challenges of budgeting and financial forecasting. It discusses the various factors that can impact a company's financial performance, such as market fluctuations and changes in consumer behavior. The text suggests that businesses should use a combination of historical data and market research to create realistic budgets and forecasts.

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filters in the CFCUs. The purpose of the charcoal filters was to assist the containment spray system in removing radioiodines from the containment atmosphere during post accident conditions. Subsequently, the containment sprays were determined to be sufficient, and DCPD did not take credit for the charcoal filters in any of the post accident safety analyses. The charcoal filters were not installed in any CFCUs. The CFCU HEPA filters and moisture separators had already been installed when PG&E decided not to install charcoal filters. Although the HEPA filters and moisture separators have served no significant purpose since being installed, they have been maintained in an operating condition.

In accordance with the provisions of 10 CFR 50.59, DCPD is going to simplify the design and operation of the CFCUs by eliminating the HEPA filters and moisture separators from each CFCU and adjusting the variable inlet vanes to the fan in order to maintain the design air flow rate. The assumptions used to calculate onshore controlled containment venting are described in Table 15.5-28 of the FSAR Update, and do not take credit for the HEPA Filters or moisture separators in the accident analyses. In addition, the deletion of the HEPA filters and moisture separators from the CFCUs has been evaluated by Westinghouse, based on the assumption that modifications to the CFCUs will be made so the heat removal capability of the CFCUs and the heat load to the CCW system would not be affected.

Upon removal of the HEPA filters and moisture separators, the CFCU normal and accident mode dampers would be permanently secured in positions such that normal and accident mode operations could be performed without changing damper positions. The CFCU airflow rate for both normal and accident operation after the proposed changes will be in accordance with design airflow rates. All controls associated with the CFCU dampers would also be removed. This change to the CFCU dampers would require a change to the DCPD TS 4.6.2.3 which presently requires a periodic demonstration of damper operability.

C. JUSTIFICATION

The proposed TS change is consistent with Draft Revision 5 of the Westinghouse Standard Technical Specifications. In addition, by implementing the proposed changes, DCPD would be consistent with other Westinghouse units of the same design.

Permanently securing the inlet and outlet dampers in position would reduce maintenance and surveillance test activities which would result in lower radiation exposure to plant personnel. Securing the dampers in the positions as stated above would allow the flow path for normal and accident modes to be the same.

Since the changes to the CFCUs will simplify their operation and minimize the potential for malfunctions or damper failure, the reliability of the CFCUs will be improved.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for the company's financial health and for providing reliable information to stakeholders.

2. The second part of the document outlines the specific procedures for recording transactions. It details the steps from initial entry to final review, ensuring that all necessary information is captured and verified.

3. The third part of the document addresses the role of the accounting department in this process. It highlights the need for clear communication and collaboration between different departments to ensure the accuracy and completeness of the records.

4. The fourth part of the document discusses the importance of regular audits and reviews. It explains how these activities help to identify any discrepancies or errors and ensure that the records are up-to-date and accurate.

5. The fifth part of the document provides a summary of the key points discussed and offers some final thoughts on the importance of maintaining accurate records. It concludes by stating that this is a fundamental aspect of good business practice and one that should be given the highest priority.

D. SAFETY EVALUATION

Permanently securing the CFCU normal and accident operation dampers in position simplifies the CFCUs. By securing the dampers in position, fewer active parts are required to function during normal and accident conditions and there is a lower probability of having a CFCU component failure during operation. Securing the dampers would also allow the design flow rate for normal and accident conditions to be met without changing damper positions. In addition, securing the CFCU dampers in position has no adverse effect on the containment fan cooler Collection Monitoring System required by TS 3.4.6.1.c. The CFCUs are credited in the high energy line break analyses to limit the mass and energy release per their heat removal capabilities. By maintaining design flow rates for accident conditions, the results of the high energy line break accidents would not be affected. This ensures that the radiological consequences would not increase for postulated accidents.

Calculations were performed by PG&E assuming air flow through the normal inlet dampers, simulating accident operation with the HEPA filters and the moisture separators removed. The calculations verified that the flow rate for accident conditions could be achieved with the dampers secured in position through adjustment of the variable inlet vanes of the fan. In addition, post modification testing and balancing will ensure that the air flow rates for both normal and accident modes of operation are within design limits.

The changes to the CFCUs would not adversely affect the remaining plant protection systems with respect to their intended safety function and would not compromise the performance of any safety-related system.

From the above evaluation, PG&E believes there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed TS change.

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 a testing facility involves no significant hazards considerations, 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



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- (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?

The proposed modifications to the accident inlet and outlet dampers of the CFCUs simplify the system design and operation by reducing the number of components required to function during testing and standard operation. By simplifying the dampers configuration, the probability of having a damper failure is reduced. In addition, the proposed change will not adversely affect the CFCU's function of heat removal and therefore not affect analyzed accidents.

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?

Securing the dampers will have no affect on the ability of the CFCUs to perform their intended function during normal or accident conditions. In addition, the CFCUs will function the same following the proposed changes. Hence, no new failure mechanisms will be introduced.

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?

Securing the CFCU dampers would not degrade the ability of the CFCUs to perform their heat removal function, as the normal and accident operation flow rates would be met.

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 finding is justified.



G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined 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 criteria 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.



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Attachment B

MARKED-UP TECHNICAL SPECIFICATIONS

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for ensuring the integrity of the financial statements and for providing a clear audit trail.

2. The second part of the document outlines the various methods used to collect and analyze data. It describes how different types of information are gathered and how they are processed to identify trends and anomalies.

3. The third part of the document focuses on the results of the analysis. It presents the findings in a clear and concise manner, highlighting the key areas of concern and the recommended actions to address them.

4. The final part of the document provides a summary of the overall findings and conclusions. It reiterates the importance of the data and the need for continued monitoring and reporting.