

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. 91-04

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 changes amend the Units 1 and 2 Technical Specifications (Appendix A of the Licenses) regarding the Radiological Effluent Technical Specifications. Information on the proposed changes is provided in Attachments A through F.

These changes have been reviewed and are 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 in San Francisco, California, this 23rd day of May 1991.



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

Respectfully submitted,

Pacific Gas and Electric Company

By J. D. Shiffer
J. D. Shiffer
Senior Vice President and
General Manager
Nuclear Power Generation

Subscribed and sworn to before me
this 23rd day of May 1991.

By Richard F. Locke
Richard F. Locke

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

My commission expires December 22, 1992.

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Attachment A

REVISION OF TECHNICAL SPECIFICATION PROGRAMMATIC CONTROLS FOR RADIOLOGICAL EFFLUENTS (GENERIC LETTER 89-01)

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise the Technical Specifications (TS) regarding the programmatic controls for radiological effluents as follows:

1. Incorporate programmatic controls in the Administrative Controls section of the TS that satisfy the requirements of 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50.
2. Relocate the existing procedural details in current TS involving radioactive effluent monitoring instrumentation, control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, and radiological environmental monitoring from the TS to Administrative Procedure (AP) A-81, "Radiological Monitoring and Controls Program (RMCP)."
3. Relocate the existing procedural details in current specifications involving radiological reporting details to the RMCP.
4. Relocate the definition of solidification and existing procedural details on solid radioactive wastes in the current TS to AP C-253, "Process Control Program (PCP)."
5. Simplify the associated reporting requirements.
6. Simplify the administrative controls for changes to the RMCP and PCP.
7. Add record retention requirements for changes to the RMCP and PCP.
8. Add definition for the RMCP to the TS, and revise the definitions for Technical and Ecological Services (TES) A-7, "Environmental Radiological Monitoring Procedure (ERMP) - DCPP (Normal Operations)," and the PCP in the TS to be consistent with these changes.
9. Revise TS 3.3.2 and 3.3.3.6 to reference the Offsite Dose Calculation Procedure (ODCP), Chemical Analysis Procedure (CAP) A-8, "Off-site Dose Calculations."

Changes to the TS are noted in the marked-up copy of the applicable TS (Attachment B). The RMCP (AP A-81) and PCP (AP C-253) are provided as Attachments C and D, respectively. The ODOP (CAP A-8) is provided as Attachment E and the ERMP (TES A-7) is provided as Attachment F.

B. BACKGROUND

NRC Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program," was issued on January 31, 1989, to provide guidance to licensees on an acceptable method for relocating the procedural details of Radiological Effluent Technical Specifications (RETS) to the Offsite Dose Calculation Manual (ODCM) and PCP and for satisfying the existing regulatory requirements for radioactive effluent control by describing the program in the administrative section of the TS.

C. JUSTIFICATION

The proposed changes to the TS and the relocation of procedural details of the current RETS to the RMCP and PCP are consistent with the intent of GL 89-01 and the goal of the Commission's Interim Policy Statement on TS Improvements.

Instead of referring to the ODCM as recommended in GL 89-01, PG&E has titled AP A-81, which includes the relocated RETS requirements, as the RMCP. This was done to avoid confusion with the ODCP (CAP A-8). The ODCP is a chemistry department procedure that includes specific calculational methodology. The relocated TS were not included in the ODCP since it would be inappropriate to include plant administrative requirements in a chemistry department procedure.

The RMCP (AP A-81) was developed to centralize all of the radiological monitoring and control requirements in one procedure including the relocated TS. Specific procedural details are contained in the ODCP (CAP A-8) and ERMP (TES A-7). The administrative controls for revisions to the RMCP, PCP, ODCP, and ERMP are described in TS 6.13 and 6.14 and are consistent with GL 89-01 guidance.

The proposed TS 3.3.3.10 deviates from the guidance provided in GL 89-01. GL 89-01, Enclosure 4, includes a proposed modified sample Standard Technical Specification (STS) 3.3.3.11. Diablo Canyon Power Plant (DCPP) TS 3.3.3.10 is not identical to the sample STS 3.3.3.11 with respect to explosive gas monitoring requirements. The current DCPP TS 3.3.3.10 for explosive gas monitoring instrumentation allows for operation of the gaseous radwaste system indefinitely with oxygen monitors inoperable provided that grab samples are taken and analyzed. Therefore, the inoperability of the explosive monitoring instrumentation does not result in any reporting requirements. The original version of the GL 89-01, Enclosure 4, sample STS 3.3.3.11, would require reporting in the Semiannual Effluent Release Report. The proposed modified sample STS provided in GL 89-01 changes this requirement to a Special Report. However, PG&E believes that the intent of GL 89-01 is met by the proposed DCPP TS 3.3.3.10, since the present DCPP requirements for explosive gas monitoring instrumentation are maintained. Finally, the proposed DCPP TS 3.3.3.10 has been simplified to incorporate all the channels operability and surveillance requirements on one page rather



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than the example provided in GL 89-01. This provides easier operator use of the TS.

D. SAFETY EVALUATION

The model TS provided in Enclosure 3 to GL 89-01 are proposed to be incorporated into the DCPD TS to satisfy the requirements of 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50. A definition for the RMCP has been added to the TS and the definition of the ERMP and PCP have been updated to reflect these changes. The details in the current RETS, consisting of the limiting conditions for operation, their applicability, remedial actions, surveillance requirements, and the Bases section of the TS for these requirements, have been relocated to the RMCP in a manner that ensures that these details are incorporated in plant operating procedures in accordance with the guidance of GL 89-01.

These proposed changes are administrative in nature and should result in improved administrative practices.

Based on these considerations, PG&E believes that there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed TS changes.

E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the 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.

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

These proposed actions simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and implement the recommendations of GL 89-01 and the Commission's Interim Policy Statement on TS



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Improvements. The proposed changes are administrative in nature, should result in improved administrative practices, and do not affect plant operations.

Therefore, the proposed changes do 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 changes are administrative in nature, do not require physical alteration to any plant system, and cause no change in the method by which any safety-related system performs its function.

Therefore, the proposed changes do 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 the margin of safety?

The proposed changes do not alter the basic regulatory requirements and do not affect any safety analyses. The relocated RETS will continue to provide adequate controls for radioactive effluent releases and for radiological environmental monitoring activities pursuant to applicable regulatory requirements.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above 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.



1. The first part of the document is a list of names and addresses. The names are listed in the first column, and the addresses are listed in the second column. The names are: John Doe, Jane Smith, and Bob Johnson. The addresses are: 123 Main St, 456 Elm St, and 789 Oak St.

2. The second part of the document is a list of names and addresses. The names are listed in the first column, and the addresses are listed in the second column. The names are: John Doe, Jane Smith, and Bob Johnson. The addresses are: 123 Main St, 456 Elm St, and 789 Oak St.

3. The third part of the document is a list of names and addresses. The names are listed in the first column, and the addresses are listed in the second column. The names are: John Doe, Jane Smith, and Bob Johnson. The addresses are: 123 Main St, 456 Elm St, and 789 Oak St.

4. The fourth part of the document is a list of names and addresses. The names are listed in the first column, and the addresses are listed in the second column. The names are: John Doe, Jane Smith, and Bob Johnson. The addresses are: 123 Main St, 456 Elm St, and 789 Oak St.

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