

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. 91-08

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company (PG&E) hereby applies to amend its Diablo Canyon Power Plant 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 Technical Specifications 1.8, "Containment Integrity," 3/4.6.1, "Containment Integrity," 3/4.6.3, "Containment Isolation Valves," and associated Bases in accordance with Generic Letter 91-08, "Removal of Component Lists from Technical Specifications." Information on the proposed changes is provided in Attachments A and B.

These changes have been reviewed and are considered not to involve a significant hazards consideration as defined in 10 CFR 50.92 and not to 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.

Sincerely,



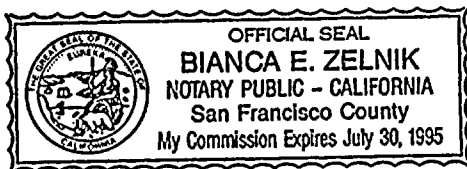
Warren H. Fujimoto

Subscribed and sworn to before me  
this 26th day of December 1991.

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

  
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## ATTACHMENT A

### REVISION OF TECHNICAL SPECIFICATIONS 1.8, 3/4.6.1, AND 3/4.6.3 REMOVAL OF CONTAINMENT ISOLATION VALVES LIST (GENERIC LETTER 91-08)

#### A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specifications (TS) to relocate TS Table 3.6-1, "Containment Isolation Valves," to Diablo Canyon Power Plant (DCPP) procedures, which are subject to the change control provisions in the Administrative Controls Section of the TS. This LAR is being made in accordance with the guidance provided in Generic Letter (GL) 91-08.

The proposed TS changes associated with the relocation of TS Table 3.6-1 are as follows:

1. TS 1.8, "Containment Integrity," and Surveillance Requirement 4.6.1.1 a. would be revised to allow for valves to be opened under administrative control as permitted by TS 3.6.3 and would delete reference to TS Table 3.6-1.
2. TS 3/4.6.3 would be revised by adding a note that locked or sealed closed valves may be opened on an intermittent basis under administrative control and removing reference to TS Table 3.6-1.

The associated Bases would also be appropriately revised.

Changes to the TS are noted in the marked-up copy of the applicable TS (Attachment B).

#### B. BACKGROUND

Maintaining containment integrity prevents excessive radioactivity from passing from the containment to the atmosphere in the event of a LOCA. Integrity is provided by the containment structure and by isolating the various penetrations which pass through the containment structure walls.

The containment isolation valves are part of the containment piping penetration isolation design. The function of these valves is to be closed or to automatically close to limit the release of radioactive fission products to the environment. TS 3/4.6.3 establishes TS requirements for containment isolation valves and TS Table 3.6-1 specifically identifies valves for which operability ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material within the containment or pressurization of the containment.



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### C. JUSTIFICATION

Relocation of TS Table 3.6-1 to DCPD plant procedures in accordance with GL 91-08 is consistent with the recommendations of NUREG-1024, "Technical Specifications - Enhancing the Safety Impact, November, 1983," as a short-term improvement item and with the industry and NRC efforts to make the TS a more clear and concise document.

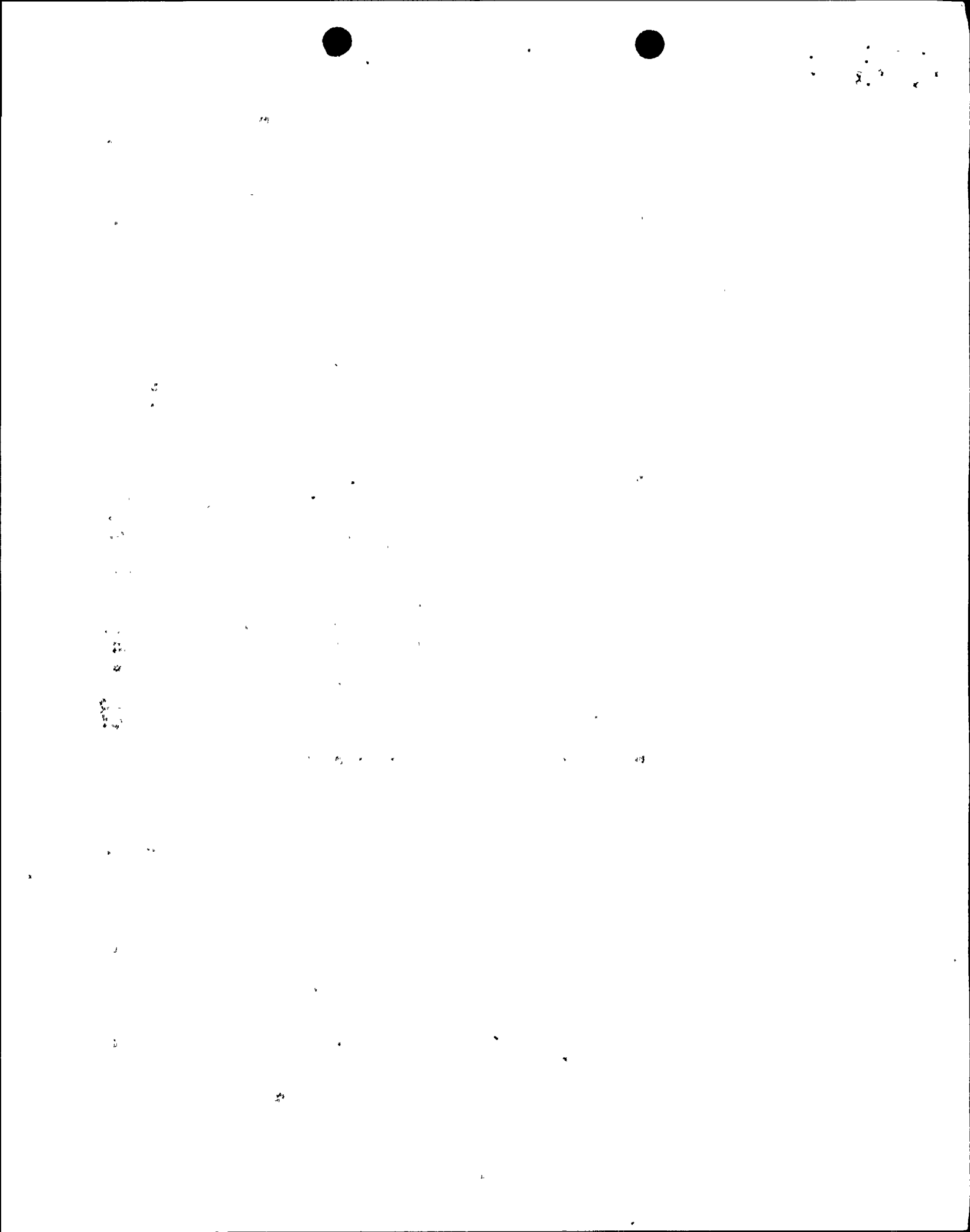
Relocation of Table 3.6-1 from the TS to DCPD plant procedures would permit administrative control of changes to the containment isolation valve list without processing a license amendment as is required to update TS component lists. Any change to the containment isolation valve list contained in plant procedures would be subject to the requirements specified in Administrative Controls, Section 6, of the TS on changes to plant procedures. Any changes to the containment isolation valve list would constitute a change to the facility and thus would be subject to the provisions of 10 CFR 50.59. Therefore, the change control provisions of the TS would provide an adequate means to control changes to these components lists, when they have been incorporated into plant procedures.

As stated in GL 91-08, Specifications may be stated in general terms that describe the types of components to which the requirements apply. This provides an acceptable alternative to identify components by their plant identification number as they are currently listed in tables of TS components. The removal of components lists is acceptable because it does not alter existing TS requirements or those components to which they apply.

Containment piping penetration isolation design features are identified in the DCPD Final Safety Analysis Report (FSAR) Table 6.2-39. The FSAR table lists each containment structure penetration and identifies the method of penetration closure used. The list describes the PG&E design implementation of the applicable provisions of the 1967 General Design Criteria, (10 CFR 50, Appendix A). The FSAR table is a list which shows the penetration isolation function and is not a component list that identifies specific components. The FSAR containment piping penetrations list also includes devices other than power operated automatic isolation valves.

Generic Letter 91-08 states that with the TS change, the LCO remedial actions and surveillance requirements will apply to all valves that are classified as containment isolation valves by the plant licensing basis. All containment isolation valves in the plant licensing basis (FSAR Table 6.2-39) will be administratively controlled by the requirements of TS 3/4.6.1 and TS 3/4.6.3. Future changes to the relocated table and to FSAR Table 6.2-39 will be controlled by the 10 CFR 50.59 review process. Relocation of the TS list does not affect the purpose or information provided in FSAR Table 6.2-39.

Relocation of TS Table 3.6-1 is similar to the DCPD relocation of TS Table 3.8-2 (Containment Penetration Conductor Overcurrent Protective Devices, LA 19 and 18), relocation of snubbers as described in Generic Letter 84-13 (requested by LAR 84-05 on DCPD Unit 1 Facility Operating Permit DPR-76, and incorporated in the NRC issuance of DCPD Units 1 and 2 combined



Technical Specifications in August 1985), relocation of fire protection as described in Generic Letters 86-10 and 88-12, and is in accordance with NRC and industry efforts to simplify Technical Specifications.

License amendments to relocate the containment isolation valve table from the TS have been issued for a number of nuclear plants, including Millstone Unit No. 3, McGuire Units 1 and 2, and Crystal River Unit 3. PG&E's request to relocate Table 3.6-1 from the DCPD TS is similar to those approved for these plants.

#### D. SAFETY EVALUATION

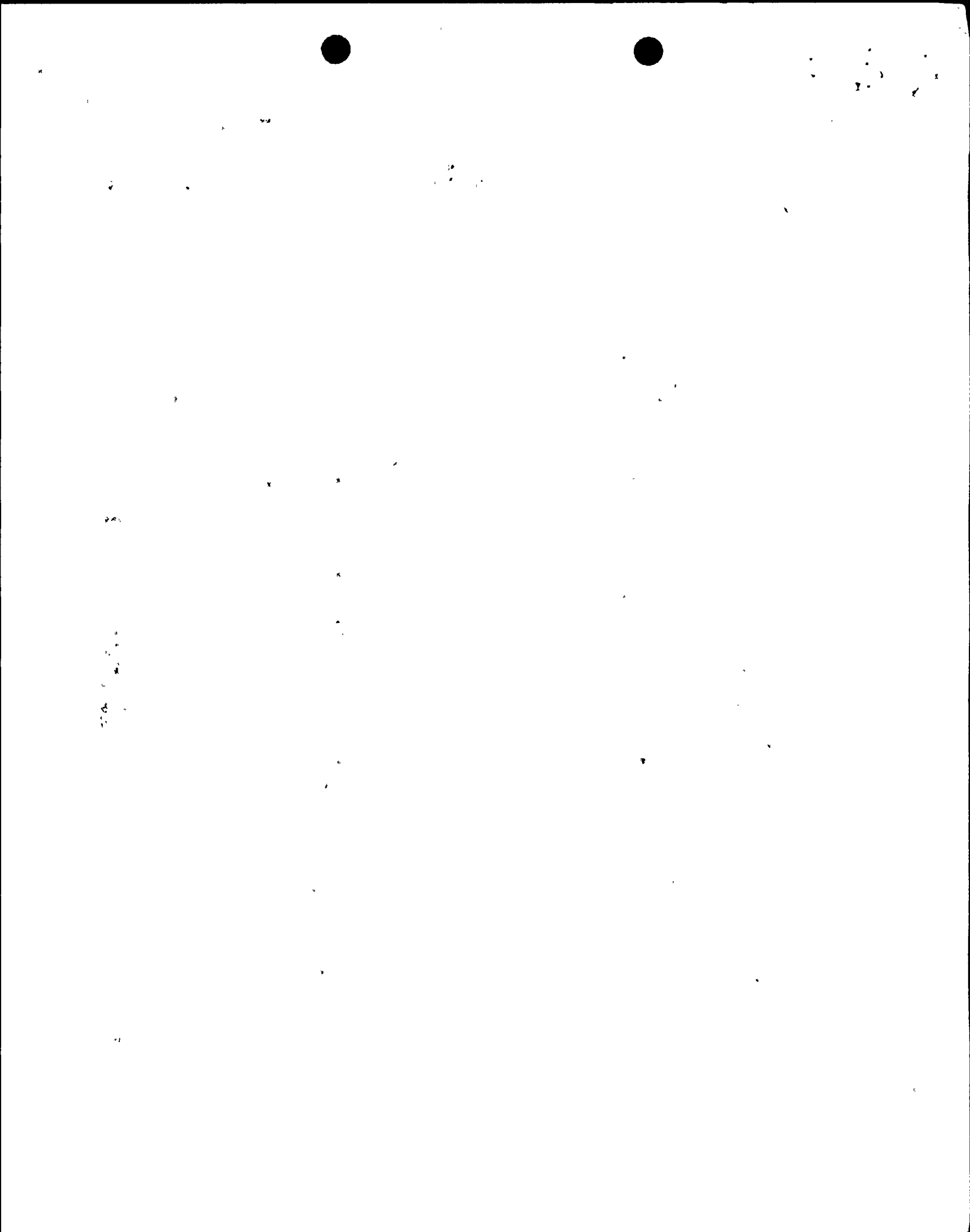
The proposed relocation of the TS Table 3.6-1 would allow PG&E to make revisions to the containment isolation valve table under appropriate administrative controls. Presently, changes to the table can only be made with prior Commission approval utilizing the license amendment process in accordance with 10 CFR 50.90. With TS Table 3.6-1 relocated from the TS to plant procedures, adequate control of the table is assured by administrative procedures that control plant procedure revisions. The administrative procedures provide proper levels of review and approval and for identification of any unreviewed safety question in accordance with 10 CFR 50.59. Records of the changes are maintained and an annual report is made that includes a brief description of changes and a summary of the safety evaluation of each in accordance with 10 CFR 50.59.

TS Table 3.6-1 identifies certain valves which may be opened during plant operation as long as the valves are administratively controlled. These valves are required to be opened for testing, maintenance, and other activities. Administrative control of these valves when opened in Modes 1 through 4 is required since rapid closure would be necessary to isolate the containment during accident conditions. A note in revised TS 3/4.6.3 Basis states the valves which may be opened under administrative control are identified in the plant procedures and identifies the administrative controls. Any changes to TS Table 3.6-1 administratively controlled valves when the list is in plant procedures would be reviewed as a revision under the same control as discussed above.

The valve closure time requirements currently listed in TS Table 3.6-1 will be maintained when the list is relocated to plant procedures and subject to the administrative control discussed above. Therefore, the proposed revision does not alter the valve stroke time requirements.

The proposed revision does not alter the requirements for containment isolation valve operability currently in the TS. The LCO and Surveillance Requirements would be retained in the revised TS. Therefore, the proposed changes would not affect the meaning, application, and function of the TS requirements.

Based on this evaluation, PG&E believes there is reasonable assurance that the relocation of TS Table 3.6-1 to plant procedures would not adversely impact the TS requirements for containment isolation valves and therefore would not adversely affect the health and safety of the public.





## 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 final determination, pursuant to the procedures in 50.91, that a proposed amendment to an operating license for a facility licensed under 50.21(b) or 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 three categories of the significant hazards consideration standards.

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

The proposed changes simplify the Technical Specifications, meet the regulatory requirements for control of containment isolation, and are consistent with the recommendations of NUREG 1024 and with GL 91-08. The procedural details of the containment isolation valve table have not been changed, but only relocated to a different controlling document. 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 result in physical alterations or changes to the operation of the plant, 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.



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

The administrative change to relocate TS Table 3.6-1 to the DCPD plant procedures does not alter the basic regulatory requirements and does not affect any safety analyses. Adequate control of the content of the table is assured by existing administrative procedures.

The proposed relocation of TS Table 3.6-1 does not alter the requirements for containment isolation valve operability currently in the TS. The LCO and Surveillance Requirements would be retained in the revised TS. Therefore, the proposed changes would not affect the meaning, application, and function of the TS requirements.

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

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

In conclusion, based on the above evaluation, PG&E concludes that the activities associated with this proposed 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 effluent 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.



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