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SUBJECT: Forwards responses to Generic Ltr 91-11, "Resolution of
 Generic Issues 48 'LCOs for Class 1E Vital Instrument Buses'
 & 49 'Interlocks & LCOs for Class 1E Tie Breakers.'"

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Gregory M. Rueger
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January 30, 1992

PG&E Letter No. DCL-92-023



U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Response to Generic Letter 91-11 -
Resolution of Generic Issues 48 and 49

Gentlemen:

Enclosed is PG&E's response to NRC Generic Letter 91-11, "Resolution of Generic Issues 48, 'LCOs for Class 1E Vital Instrument Buses,' and 49, 'Interlocks and LCOs for Class 1E Tie Breakers,' Pursuant to 10 CFR 50.54(f)."

Sincerely,

Gregory M. Rueger

Subscribed and sworn to before me
this 30th day of January 1992.

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ENCLOSURE

RESPONSE TO NRC GENERIC LETTER 91-11

Background Information

Generic Issue (GI) 48, "LCOs for Class 1E Vital Instrument Buses," was initiated by the NRC because some plants were discovered not to have any administrative controls governing operational restrictions for their Class 1E 120 VAC vital instrument buses (VIBs) and associated inverters. Without such restrictions, the normal or alternate power sources for one or more VIB could be out of service indefinitely. This condition could prevent certain safety systems from meeting the plant design basis. GI 49, "Interlocks and LCOs for Class 1E Tie Breakers," was initiated by the NRC following discovery at a plant of a tie breaker that had been improperly left closed after a plant shutdown, and is limited to manually actuated tie breakers that can connect either normally independent, redundant Class 1E AC or DC buses at one unit or Class 1E buses in different units at the same site.

In Generic Letter 91-11, the NRC concluded that licensees should have procedures to fulfill the following requirements unless adequate justification was provided to show that such provisions were not necessary:

1. Limit the time that a plant is in possible violation of the single-failure criterion with regard to the Class 1E vital instrument buses and tie breakers,
2. Require surveillances of these components, and
3. Ensure that, except for the times covered in Item (1), the plant is operating in an electrical configuration consistent with the regulations and its design bases.

PG&E Response

Diablo Canyon Power Plant (DCPP) is operated in a manner that requires routine weekly checks by performing surveillance test procedures of the electrical systems described in GL 91-11. The DCPP Technical Specifications (TS) include surveillance requirements for specified electrical buses to verify correct breaker alignment and indicated bus voltages. This TS requirement is satisfied by performing Surveillance Test Procedure (STP) I-1C, "Routine Weekly Checks," for both units on a weekly basis. The TS Action Statements apply when appropriate.

With respect to GI 48, a review of the DCPP electrical design and applicable procedures was performed. This review determined that STP I-1C precludes conditions that would allow, without restrictions, the removal from service of one or more of the normal or alternate power sources for the VIBs for repair or maintenance. Routine weekly checks are performed to verify that the vital and supplemental buses supplied by the 120 VAC inverter are in their proper alignment per TS 4.8.2.1 and 4.8.2.2 requirements. PG&E therefore concludes that the concern noted in GI 48 is not applicable to DCPP.

With respect to GI 49, the DCPD Class 1E electrical system design does not include maintenance tie breakers. The proper alignments of the 4 kV, 480 VAC, and vital 120 VAC and 125 VDC systems are included in Limiting Condition for Operation TS sections 3.8.1.1, 3.8.1.2, 3.8.2.1, 3.8.2.2, and 3.8.3.1. Correct breaker alignments are verified at least once in 7 days per TS 4.8.1.1.1.a, 4.8.1.2, 4.8.2.1, 4.8.2.2 and 4.8.3.1.a. STP I-1C implements the above surveillance requirements. PG&E therefore concludes that the concern noted in GI 49 is not applicable to DCPD.

Summary

PG&E therefore concludes that, pursuant to the resolution of GIs 48 and 49 as discussed above, appropriate procedures are in place to fulfill the three requirements of GL 91-11 and that no further actions by PG&E are required.



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