ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of PACIFIC GAS AND ELECTRIC COMPANY	Docket No. 50-275 Facility Operating License No. DPR-80
Diablo Canyon Power Plant Units 1 and 2	Docket No. 50-323 Facility Operating License No. DPR-82

License Amendment Request No. 92-03

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 Technical Specifications (Appendix A of the Licenses) regarding Technical Specifications 3/4.8.1 and 3/4.8.2 and associated Bases.

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,

Gregory M. Rueger

Subscribed and sworn to before me
this 14th day of February 1992.

OFFICIAL SEAL
ADRIANE D. TOLEFREE
NOTARY PUBLIC - CALIFORNIA
ALAMEDA COUNTY
My Comm. Expires Dec. 22, 1992

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ATTACHMENT A

REVISION OF TECHNICAL SPECIFICATION 3/4.8.1 AND 3/4.8.2
INCREASE EMERGENCY DIESEL GENERATOR FUEL OIL STORAGE REQUIREMENTS

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to change Technical Specification (TS) 3/4.8.1, "A.C. Sources, Operating," and TS 3/4.8.2, "A.C. Sources, Shutdown."

The proposed changes to TS 3.8.1.1.b.2 are as follows:

> The combined storage of emergency diesel generator (EDG) fuel oil for one unit operation in Modes 1 through 4 is increased from 31,023 gallons to 33,000 gallons. The combined storage of EDG fuel oil for two unit operation in Modes 1 through 4 is increased from 52,046 gallons to 65,000 gallons. A footnote is added to define the oil storage requirements for one tank taken out of service for performance of TS surveillance requirement 4.8.1.1.3.e for draining and cleaning the tank at least once per ten years.

The proposed changes to TS 3.8.1.2.b.2 are as follows:

> The storage of EDG fuel oil for one unit operation in Modes 5 through 6 is increased from 8,000 gallons to 26,000 gallons. A footnote is added to define the fuel oil storage requirements for one tank taken out of service for performance of TS surveillance requirement 4.8.1.1.3.e for draining and cleaning the tank at least once per ten years.

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

Diablo Canyon Power Plant (DCPP) Units 1 and 2 have five EDGs to provide emergency A.C. power in the event of a loss of offsite power. Two EDGs are dedicated to each unit and one "swing" EDG can be configured to either unit as needed. The function of the A.C. power sources is to provide power for the operation of emergency systems and engineered safety features (ESF) during and following the shutdown of the reactor in the event that offsite power sources are not available. The A.C. power sources are sufficient to operate the ESF systems required to mitigate a design basis loss of coolant accident (LOCA) in one unit as well as those systems required for a concurrent safe shutdown of the other unit.

TS 3.8.1.1 and TS 3.8.1.2 require that a volume of fuel oil be maintained to support operation of the EDGs. The diesel fuel oil storage system at

DCPP consists of two common tanks with a nominal capacity of 40,000 gallons each and five diesel fuel oil day tanks with a nominal capacity of 550 gallons each. The fuel oil maintained in each day tank is used for the start and the initial operation of its associated EDG. Additional fuel oil is transferred from the storage tanks to replenish the day tanks as required.

TS 3.8.1.1 currently requires the following minimum inventory of fuel oil to be maintained for Modes 1 through 4 unit operation:

- 200 gallons of fuel oil in each EDG day tank,
- a combined storage tank inventory of 31,023 gallons for one unit in Modes 1 through 4 operation, and
- a combined storage tank inventory of 52,046 gallons for two units in Modes 1 through 4 operation.

For Modes 5 and 6, TS 3.8.1.2 currently requires a minimum inventory of 200 gallons of fuel oil in one EDG day tank and 8,000 gallons of fuel oil storage for one unit operation in Modes 5 and 6.

PG&E has conducted a review of the fuel oil inventory design basis and licensing documentation. This review located calculations for the storage tank capacity but did not locate specific calculations for the original TS-required diesel fuel oil inventory to be maintained in the tanks. Discussions with personnel involved with the development of the original requirements for diesel generator fuel oil storage inventory indicated that the Modes 1 through 4 amounts were established as 10,000 gallons per diesel generator based on the EDG capacity and expected engine fuel oil consumption. Fuel oil consumption was not calculated using specific component loadings at that time.

The current TS Mode 5 and 6 fuel oil inventory requirement was reached by agreement during the licensing process to allow for the operation of one unit in Modes 1 through 4 and one unit in Modes 5 or 6 with a single fuel oil storage tank in service. The agreed Mode 5 and 6 inventory plus the inventory for Modes 1 through 4 is within the tank capacity for one tank (31,023 gallons for Mode 1-4 plus 8,000 gallons for Modes 5 and 6). The total required volume provides the operational/maintenance flexibility to remove one fuel oil storage tank from service with one unit in Modes 1 through 4 operation and one unit in Modes 5 or 6.

In addition to the inventory requirements in the TS, the FSAR makes a separate statement regarding the capacity of the fuel oil storage system. FSAR Update Section 9.5.4.1 states in part:

> The fuel oil storage capacity provides 7 days of on-site power generation in order to operate: (a) the minimum required ESF equipment following a loss-of-coolant accident (LOCA) for one unit, and the equipment for the second unit in either the hot or cold shutdown condition, or (b) the equipment for both units in either the hot or cold shutdown condition.

Review of the design files indicate that the intent of the FSAR statement was to establish the basis for the physical storage capacity of the tanks. The TS and the FSAR statements existed as independent commitments. The FSAR statement established the capacity of the storage system, while the TS delineated the required inventory to be maintained in the tanks. Because the basis for the TS inventory requirements was not associated with a specific EDG loading condition, it was not possible to properly assess the impact of DCPP EDG load changes on the adequacy of the diesel generator fuel oil inventory. To remedy this situation, PG&E initiated a task to develop an enhanced basis for the TS fuel oil inventory. The augmented basis establishes a specific EDG loading which makes it possible to evaluate the effects of design changes on the EDG fuel oil consumption. PG&E elected to define the basis for the TS fuel oil inventory in accordance with the FSAR commitment of providing sufficient fuel oil to provide for 7 days of onsite power generation to operate the minimum required ESF equipment following a LOCA for one unit and the equipment for the second unit in either the hot or cold shutdown condition. Fuel consumption calculations were performed to establish the revised TS fuel oil inventory requirements, including Modes 5 and 6.

The proposed TS fuel oil inventory quantities for unit operation in Modes 1 through 4 are based on the minimum ESF loads required to achieve a unit safe shutdown following a LOCA and to reach and maintain the second unit in a safe shutdown mode. The fuel oil inventory quantity for unit operation in Modes 5 or 6 is based on the minimum loads required to maintain safe operation in those Modes. For the purpose of the calculation, minimum ESF loads is defined as the minimum set of equipment necessary to mitigate the designated condition. Redundant components were not considered to be operating when establishing the EDG loading. Each of the loads was evaluated to determine the manner in which it would operate. Each ESF component was assumed to operate only as long as required to mitigate the postulated condition. The operating durations for minimum ESF equipment are not tied directly to plant emergency procedures. Such a tie is not required for the purpose of the calculation. Also, establishing a fixed emergency procedure to address specific components needed for response to a given postulated condition would unnecessarily restrict the operator's flexibility to respond properly for other possible conditions.

Based on the above approach, the minimum ESF loads were totaled for each of the following cases:

Case 1 Unit is operating in Modes 1-4 (Power operation through Hot Shutdown) and experiences a LOCA

Case 2 Unit is operating in Modes 1-4 and is taken to either Modes 4 or 5 (Hot or Cold Shutdown)

Case 3 Unit is in Modes 5 or 6 (Cold Shutdown or Refueling) and remains in that mode

The loads were totaled as appropriate with the configurations in TS 3.8.1.1 and TS 3.8.1.2. The specific fuel consumption data of the performance tests of the DCPP EDGs was used to determine the total amount

of fuel consumption needed to support the minimum ESF loads for each configuration. An allowance for unusable tank volume and an allowance for possible future load growth were added to the calculated consumption to establish the proposed inventory to be maintained.

The fuel oil inventory proposed by this LAR would increase the current TS 3.8.1.1 storage requirements for operation in Modes 1 through 4. Exclusive of the allowance to provide "margin" to accommodate future design changes and electrical load increases, the calculated inventory requirements can be shown to be within the existing TS 3.8.1.1 requirements.

However, the Modes 5 and 6 fuel oil requirement (exclusive of "margin") proposed by the LAR is greater than the current amount specified in TS 3.8.1.2. This result was not unexpected because the basis used to determine the proposed inventory is different from the basis of the current requirement. As discussed above, the current TS Modes 5 and 6 requirement is a result of TS 4.8.1.1.3.e that requires removal of a fuel oil storage tank from service for cleaning within a 10-year period. The inventory in the remaining tank must provide sufficient fuel oil for one unit in Modes 1 through 4 operation and one unit in Mode 5 or 6 operation. The combination of the fuel oil amount currently specified in TS 3.8.1.2 and the amount currently specified in TS 3.8.1.1 for one unit operation was established to be within the capacity of one tank. The fuel oil amount specified in TS 3.8.1.2 was not based on a consumption calculation for Mode 5 and 6 operation, but was established to provide the operational/maintenance flexibility to remove one storage tank from service with one unit in Modes 1 through 4 operation and one unit in Mode 5 or 6.

The first 10-year tank inspection must be completed by November 2, 1994. PG&E plans to accomplish the tank inspection with one unit in Mode 6 because the emergency power requirements are lower for the unit in that mode and consequently the calculated fuel consumption is lower, or with the reactor vessel defueled. The fifth Unit 1 refueling outage (September 1992) is planned to be a longer outage because the reactor vessel 10-year inservice inspection (ISI) will be done at that time. The performance of the vessel ISI will result in the reactor being in a defueled status for a longer time than for a normal refueling. Although reactor vessel defueled is not a prerequisite for taking a fuel oil storage tank out of service, PG&E considers core offload to be an optimal time. PG&E currently plans to conduct the tank cleaning during the September 1992 Unit 1 fifth refueling.

PG&E plans to install a sixth EDG at Diablo Canyon (License Amendment 44/43, dated October 4, 1989). This change will provide three dedicated EDGs for each unit and will eliminate the swing EDG feature of the current design. The minimum electrical loads in accordance with the above FSAR basis requirement are not increased as a consequence of adding the sixth EDG, therefore the addition of the sixth diesel does not increase the calculated fuel oil consumption.

Currently, the EDG fuel oil inventory requirements are being administratively controlled at an amount higher than the current TS

Surveillance Test Procedure (STP) M-10A, "Diesel Fuel Oil Storage Tank Inventory." STP M-10A was revised to require a minimum acceptance criteria of 63,000 gallons for either two unit operation in Modes 1 through 4 or for one unit operation in Modes 1 through 4 and one unit in Mode 5 or 6. The administrative action to increase the amount of stored fuel oil over that required by the current TS was done as a conservative interim action while the inventory calculations were being finalized.

C. JUSTIFICATION

The proposed TS changes increase the amount of EDG fuel oil storage to provide additional margin in both TS numbers for future plant modifications and/or load changes. In addition, for TS 3.8.1.2, the proposed change provides a basis for determining Modes 5 and 6 fuel oil inventory which is consistent with the methodology used to determine the proposed fuel inventory requirements for Modes 1 through 4. The proposed increase in the amount of stored fuel oil for Modes 5 and 6 consumption, accompanied by a footnote, provides a conservative approach considering the infrequent occasion when there is a need to remove a tank from service. However, the flexibility provided in the current TS to enable removal of a storage tank from service while continuing to operate with one unit in Modes 1 through 4 and one unit in Mode 5 or 6 would no longer be possible with the proposed inventory increase without the footnote.

The TS footnote has been added in order to identify the requirements necessary to allow continued unit operation when a storage tank is taken out of service for the performance of TS 4.8.1.1.3.e. A reduced amount of fuel oil storage, limited by the remaining tank capacity, is specified during the period while a tank is out of service and one unit is in Mode 6 with at least 23 feet of water over the reactor vessel flange or with the reactor vessel defueled. Sufficient diesel generator fuel oil storage is maintained for the A.C. power sources to operate the minimum required ESF systems to mitigate a LOCA in the operating unit or to power the minimum systems required for a non-LOCA safe shutdown of that unit. The A.C. power sources will also supply power to the minimum systems required to maintain safe conditions for the unit in Mode 6 with at least 23 feet of water over the reactor vessel flange or with the reactor vessel defueled. The proposed change to add the footnote is necessary to support the performance of the TS tank cleaning surveillance.

D. SAFETY EVALUATION

Technical Specification Changes

The safety function of the EDGs is to provide power for the operation of emergency systems and ESF systems during and following the shutdown of the reactor in the event that offsite power sources are not available. The EDGs provide sufficient A.C. power to operate the ESF systems required to mitigate a design basis loss of coolant accident (LOCA) in one unit as well as those systems required for a concurrent safe shutdown in the remaining unit.

The fuel oil storage is required to support the operation of the EDGs to fulfill their safety function. The changes proposed by this LAR increase the current TS-required fuel oil storage for the EDGs and thus provide additional conservatism in supporting the EDG safety function. The proposed changes in required fuel oil storage have no effect on the function of the EDGs to start, load, and to power essential equipment in the event of a loss of offsite power (LOOP). The function of the diesel generators to provide emergency power to essential equipment is not impaired by these proposed changes. Consequently, the proposed changes do not have an adverse effect on safety of the plant and the public.

Fuel Oil Tank Cleaning

The fuel oil storage requirements in the current TS provide for the removal of one tank from service for cleaning every 10 years in compliance with TS 4.8.1.1.3.e. The increased fuel oil storage in Modes 5 and 6 as proposed in the LAR would not allow for removal of one tank from service and still meet the fuel storage requirements to satisfy the FSAR Update statement.

The need for removal of a tank from service for the 10-year inspection is accommodated in the proposed TS footnote. The proposed TS footnote allows for a reduced amount of fuel storage when a tank is out of service for cleaning in order for the amount to be accommodated within the capacity limit of the tank remaining in service. The fuel oil inventory maintained in the remaining tank is calculated to provide a 4-day supply to operate the EDGs to power either the minimum required ESF systems to mitigate a LOCA in the Mode 1-4 operating unit or the minimum systems required for a safe non-LOCA shutdown of that unit and to power the minimum required systems in the other unit to maintain safe conditions during Mode 6 operation.

The 4-day fuel inventory condition would exist for a limited time during the 10-year frequency tank cleaning. During tank cleaning, the plant operating modes are restricted, and temporary onsite fuel oil storage is planned.

PG&E estimates that the steps involved with fuel oil storage tank draining, cleaning, inspection, and refill can be completed within 10 days. The estimated time is from the tank being removed from service to when it is returned to service, based on a 24 hour/day effort.

Temporary onsite fuel oil storage is currently planned to be available to replenish the tank inventory, if needed. The fuel oil removed from the tank to be cleaned is planned to be stored in tank trailers parked in the DCPP site exclusion zone outside of the access control zone. The temporary storage will be accomplished in such a way that it does not present a fire or safety risk to vital plant systems. Following the storage tank cleaning, the fuel from the tank trailers will be used to refill the storage tank. If a condition requires extended operation of the diesel generators during the time while a storage tank is being cleaned, in addition to obtaining delivery of additional fuel to the site, the inventory in the remaining fuel oil storage tank could also be replenished from these tank trailers.

The 4-day fuel oil supply provides a sufficient operating period within which offsite power can be restored and/or additional fuel can be provided to replenish the fuel oil storage tank inventory. The proposed TS quantity specified to be maintained in one fuel oil storage tank while the other is cleared to be cleaned is 35,000 gallons.

PG&E considers a 4-day operating fuel oil inventory in one fuel oil storage tank, once every 10 years when the tanks are being cleaned, to be acceptable for several reasons. First, the probability of a LOOP event is relatively low making the need for fuel oil relatively unlikely to occur during the 10-day inspection period. Second, following a postulated LOOP event, data collected for the Diablo Canyon PRA dated July 1988 shows the offsite power will be recovered within 24 hours more than 90% of the time with a 95% confidence factor. Thus, it is unlikely the plant will have to rely on EDG power beyond 24 hours. However, if restoration of offsite power is delayed following a postulated LOOP event, diesel fuel oil could be transported to the site from the fuel oil supplier located at Avila Beach, within 10 miles of the plant or additional diesel fuel is planned to be available from temporary onsite diesel fuel oil supplies.

Although the fuel oil transfer pumps, filters, and strainers that constitute the two parallel fuel oil transfer trains will not be taken out of service due to one tank being drained, the temporary configuration results in a one tank, foot valve in the tank, and supply line from the tank up to the cross connection line being common to both fuel oil transfer trains. Downstream of the cross connection supply line, the two parallel fuel oil transfer trains will be operable with either being able to supply fuel oil transfer from the single storage tank.

The common line between the tank and the cross connection is not sized for the flow rate resulting from simultaneous operation of two fuel oil transfer pumps. Consequently, to avoid a condition where both fuel oil transfer trains may operate, the fuel oil transfer pump normally associated with the tank will be ready to start in the normal fashion upon actuation from the EDG day tanks control signals. The second fuel oil transfer pump, which is temporarily connected to the fuel oil storage source through the cross connecting line, will be maintained in standby mode as described below.

The fuel oil transfer pump control switches are normally in the "AUTO" position. In the event of a loss of offsite power, the switches are positioned to "On" and the transfer pumps operate continuously. There is a recirculation system on each pump discharge which enables continuous operation of the transfer pump when the day tanks are filled and the pump is still operating. Each pump discharge also has a relief valve. The recirculation system and the relief valve discharge to the oil storage tank to which the fuel oil transfer pump is normally aligned. It is undesirable to have the potential for recirculation or relief valve discharge into the tank being cleaned. Consequently, when a tank is cleared for cleaning, the associated fuel oil transfer pump will have the recirculation system valved out and the relief valve discharge routed to the other tank. The fuel oil transfer pump associated with the tank to be cleaned remains operable in the above configuration and is available for manual start (referred to hereafter as standby). In the event the "On"

transfer pump fails upon demand, the standby transfer train will be manually placed in the "AUTO" control mode. In "AUTO" mode, the pump will be actuated by level switches in the EDG day tanks and will stop when the day tank level is restored. The pump will subsequently start if actuated again by the day tank level switch. The pump discharge configuration and control of the fuel transfer train normally associated with the in-service storage tank will not be altered. Thus, both fuel oil transfer trains are available to deliver fuel oil to the day tanks with the one train associated with the tank cleared for cleaning in a standby mode.

One fuel oil transfer train can deliver sufficient fuel for the five diesel generators. If needed in the event of the failure of the operating fuel oil transfer train, the standby train will be started by operator action in response to alarms indicating a trip of the operating fuel oil transfer system. The TS-specified EDG day tank minimum volume will continue to fuel the diesels while taking the manual action to start the standby fuel oil train. Revision will be made to the annunciator response procedure AR PK16-07 series as appropriate for this temporary mode of operation. An independent means of fuel oil transfer is also provided by the portable fuel oil transfer pump. This is a diesel powered pump which can bypass the tank foot valve, suction line and transfer pump and supply fuel oil from the tank to the transfer pump discharge.

Probabilistic Risk Assessment (PRA)

A PRA evaluation has been performed to quantify the increase in risk which results from one diesel fuel oil tank being unavailable for up to 10 days for cleaning every 10 years. TS 3.8.1.1.g requires restoration of an inoperable Diesel Generator Fuel Oil Storage and Transfer (DFO) System to OPERABLE status within 72 hours. The PRA evaluates the change in core damage frequency associated with the additional period between 72 hours and 10 days during which only one storage tank will be in service.

The Diablo Canyon PRA (DCPRA) was used as the basis for evaluating the effect on Core Damage Frequency (CDF). Consideration of a single storage tank alignment was not included in the DCPRA model for the fuel oil transfer system because of the infrequent requirement to perform tank cleaning and the relatively short duration allowed by the TS. The CDF was determined by utilizing the DCPRA, with the existing EDG fuel oil system fault tree model modified to agree with the temporary alignment described above. Therefore, it is necessary to quantify the change in DFO system unavailability due to the single tank alignment. The primary effects of the single tank alignment on the DCPRA models are as follows.

1. The change to the DFO transfer system due to aligning both fuel oil transfer trains to a single tank and changing the pump control and discharge configuration in one train.

    a. The failure of the fuel oil tank foot check valve to open (0-33 or 0-34, depending on the tank in service) can cause system failure. Under normal system alignment, failure of a foot valve would only fail its associated train.

b. The human action to start the standby fuel oil transfer train associated with the tank to be cleaned.

c. The number of start demands for one fuel oil supply train when in the "AUTO" control mode.

2. The probability of and effect of an initiating event occurring during the additional 7-day period that the DFO transfer system is in the single tank alignment.

3. The increase in risk (CDF) associated with increasing the period that the DFO transfer system can be aligned to a single tank.

The system unavailability can be modeled by determining the probability of failure of the fuel oil tank foot valve, the probability of failure of the human action to start the standby fuel oil transfer train, and the probability of failure of both transfer trains upon start demands. Since current TS 3.8.1.1.g allows one supply train to be unavailable for a period of 3 days, and the proposed TS would allow one tank to be unavailable for a period of 10 days (with both transfer trains available), this was considered to be an increase of 7 days.

The change in risk which results from one fuel oil storage tank being cleared for cleaning beyond 72 hours (up to a total of ten days) was determined to be 1.7E-7/year. There are two fuel oil storage tanks and it is planned to clean both of them consecutively. The resulting change in risk for two tanks to be cleaned consecutively in one year is 3.5E-7/year. These changes were determined conservatively and they constitute less than a 1% increase in annual core damage frequency. The increase in annual core damage risk associated with tank cleaning is temporary, and would be anticipated to occur only once every 10 years. Thus, it is concluded that the impact of having a diesel fuel oil storage tank out of service beyond 72 hours and not to exceed 10 days is negligible.

The following compensatory administrative measures would be taken when one tank is to be taken out of service in accordance with the proposed TS footnote:

1. One unit will be in Mode 6 (Refueling) with at least 23 feet of water above the reactor vessel flange or with the reactor vessel defueled before the tank is removed from service.

2. The offsite circuits required by TS 3.8.1.1.a for the Unit in Modes 1 through 4 operation and by TS 3.8.1.2.a for the Unit in Mode 5 or 6 operation will be verified to be operable.

3. Two supply trains of the Diesel Generator Fuel Oil Storage and Transfer System (downstream of the suction pipe cross connection) required by TS 3.8.1.1.b.2 will be verified to be OPERABLE for fuel transfer from the tank remaining in service before the other tank is removed from service.

PG&E believes that this evaluation provides reasonable assurance that the proposed changes to TS 3.8.1.1 and TS 3.8.1.2 will not adversely affect the health and safety of the public.

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 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 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 changes commit to maintaining an increased inventory of oil within the existing fixed combined capacity of the fuel oil storage tanks. The increase provides additional conservatism for the EDG fuel consumption to power safety related components. When performing TS surveillance 4.8.1.1.3.e, administrative compensatory measures will be taken to reduce the potential challenge to the EDG and to verify the operability of the fuel oil transfer system. A PRA was performed and demonstrates that the change in core damage frequency associated with taking one tank, or both tanks consecutively, out of service for 10 days for each tank, every 10 years is not significant.

   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 fuel oil storage changes would not involve any physical change to plant systems and, in particular, to the fuel oil storage tanks. The changes do not affect the ability of the diesel generators

to start and to fulfill their safety-related function. Whereas temporary storage of fuel oil is planned to be onsite during tank cleaning, the location will be sufficiently remote from the plant buildings to accommodate the storage without risk to plant safety systems.

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 a margin of safety?

Increasing the required quantity of fuel oil storage is conservative from the viewpoint of mitigating a loss of offsite power event. Adding a footnote to allow taking a tank out of service in accordance with TS-required surveillance for 10 days every 10 years has been evaluated and shown to not impair safe operation of the plant. Having a single fuel oil storage tank in service does not reduce the margin of safety as delivery of fuel oil to the site is available within 4 days. Also a temporary source of fuel oil is planned to be available onsite and other administrative compensatory measures will be taken to minimize the potential impact of having one fuel oil storage tank out of service.

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 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.