



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

May 6, 1992

Docket Nos. 50-275
and 50-323

Mr. Gregory M. Rueger
Senior Vice President and General Manager
Nuclear Power Generation Business Unit
Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

Dear Mr. Rueger:

SUBJECT: FINAL SAFETY ANALYSIS REPORT UPDATE: FACT-FINDING VISIT

In November 1991, the Commission directed the staff to determine how licensees are responding to the requirement in 10 CFR 50.71 for annual updates to the Final Safety Analysis Report (FSAR), to ensure that the information included in the FSAR contains the latest material developed, and to determine whether and how the annual updates to the FSAR fall short of describing the licensees' current licensing basis (CLB). The staff is utilizing the definition of CLB from 10 CFR 54.3. Although set out in Part 54, that definition represents the staff's understanding of the scope of the CLB and should be applicable to all reactor licensees.

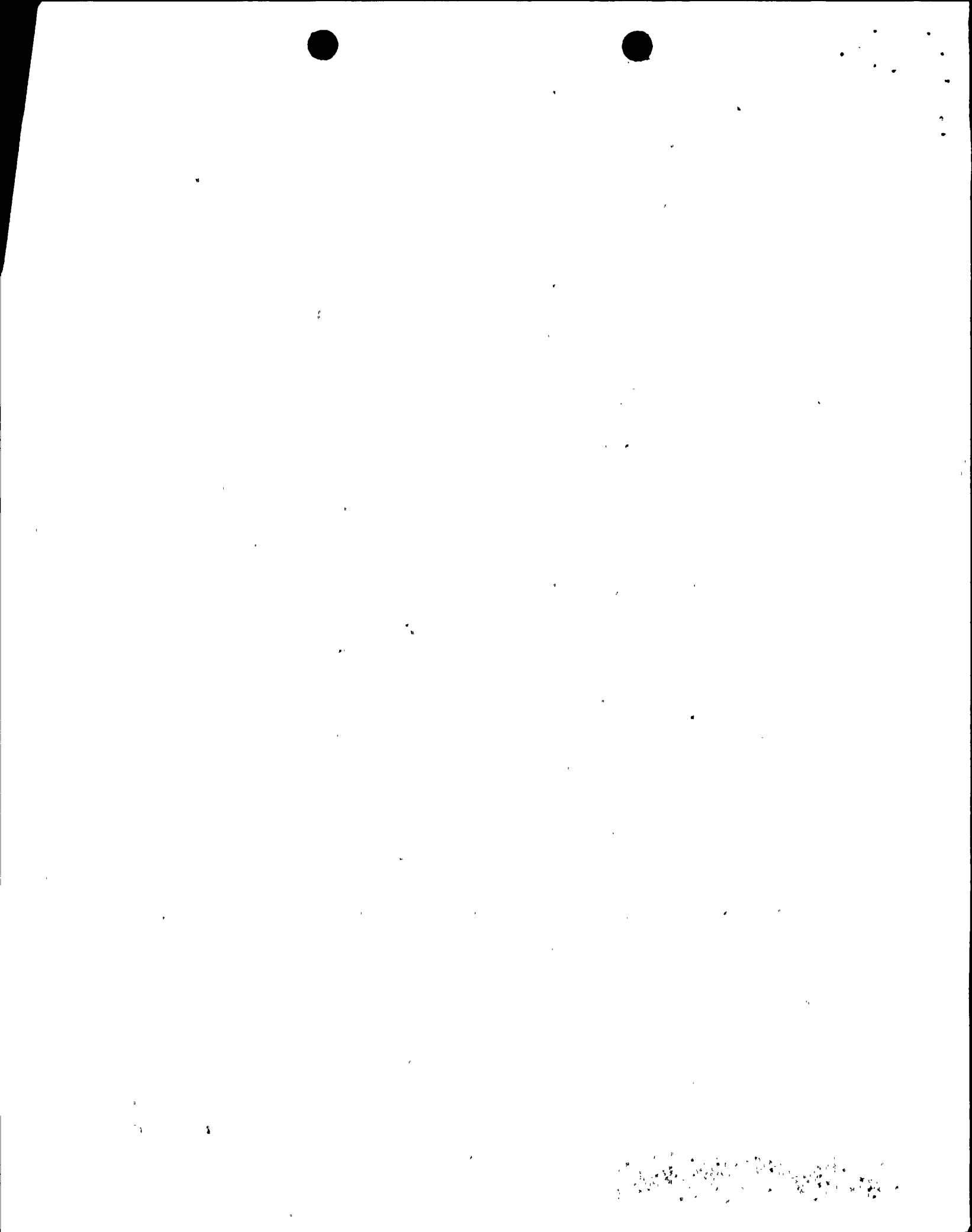
The staff will accomplish the Commission's directive by conducting fact-finding visits to a number of licensees that represent a good cross section of the industry. Our selection of plants includes those licensed from 1970 through 1987, all reactor vendor types, plants from all regions, and plants with known computerized systems for tracking commitments and those without such systems. We will visit each site and discuss your plant-specific programs for updating the FSAR by following the resolution of selected issues through the update process. We would also like to take advantage of our visit to your facility to observe whatever systems you employ to track commitments, search data for CLB type information, or record your FSAR for easy update, search, and/or retrieval.

We have chosen a number of issues which came about as the result of new regulations or staff interpretations of regulations so that the licensing basis for plants was expanded or further defined. Some or all of the issues also required facility modifications or new systems which may be described in the FSAR. For our fact-finding visit, we are not interested in the technical adequacy of the issue. Our objective is to understand your methodology and processes for updating the FSAR so that we will be able to advise the Commission on industry practices.

DFD1 / 0
NRC FILE CENTER COPY

9205200065 920506
PDR ADDCK 05000275
P PDR

RA-3
asp



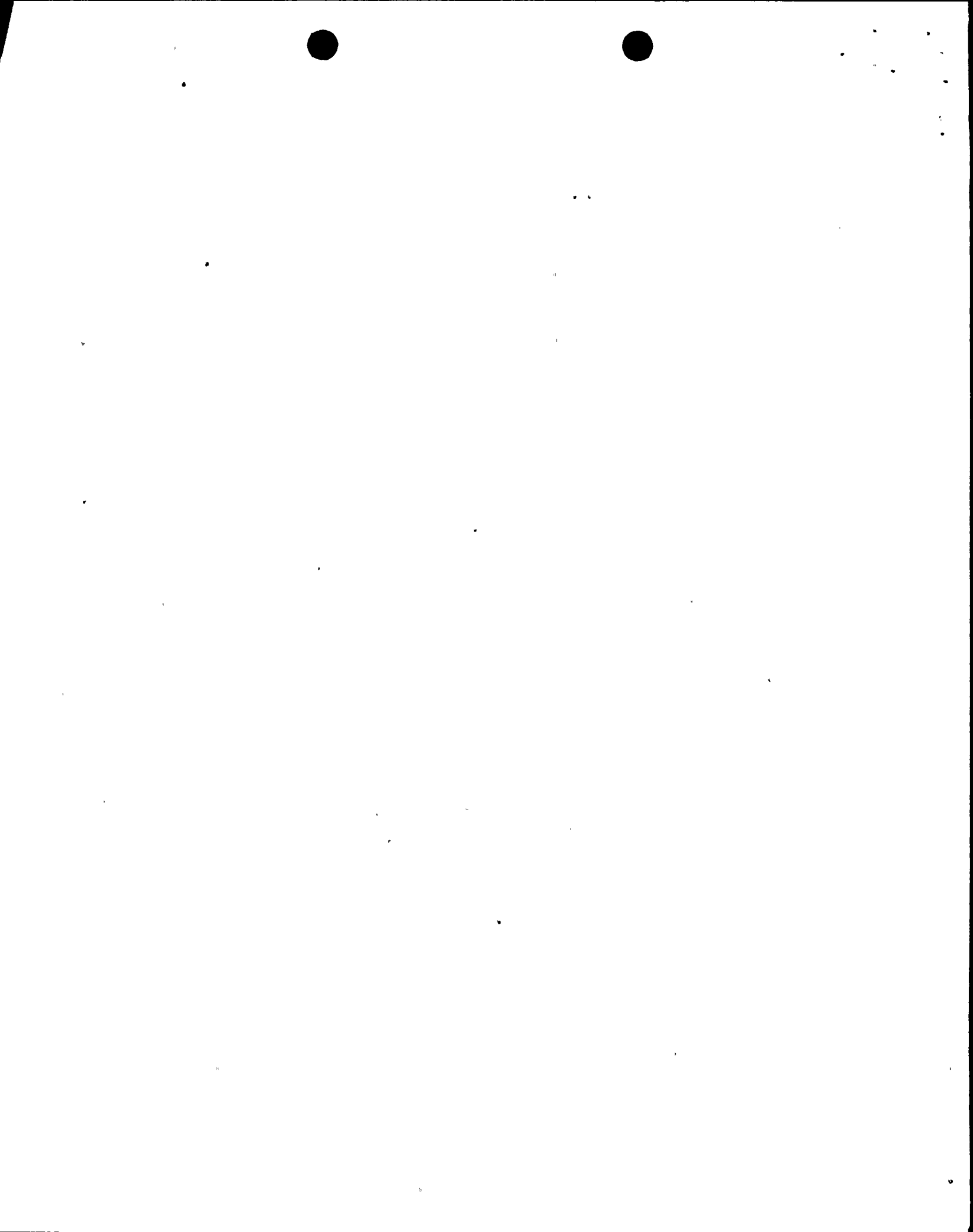
For Diablo Canyon, we have chosen the following issues for discussion:

- 1) Salem ATWS Item 4.3, "Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment),
- 2) Safety Parameter Display System,
- 3) TMI Item II.F.2.4, instrumentation to follow the course of an accident, and
- 4) ATWS, Anticipated Transients Without Scram.

We will bring the initiating documents such as Generic Letters with us, and it is requested that you have available for discussion your updated responses to the identified concerns, our acceptance letters and inspection reports that formed the CLB for the issues, and any other docketed correspondence such as your response to an enforcement action or licensee event report that, through new commitments, modified the CLB for that issue. We can then follow the process from initiation through implementation and finally the latest FSAR update. In addition, it is requested that you identify one issue from your last FSAR update that included new licensing basis and/or plant modifications and be able to show how your latest update was accomplished. This should reveal how or if your update process has evolved over time.

The staff has committed to respond to the Commission with a report in the June 1992 time period. With your help, we believe we can meet this schedule with an accurate representation of the industry practice on FSAR updates and their relation to the CLB. We would like to meet with your staff that is responsible for your FSAR updates on May 12, 1992. Please let me know if this schedule is acceptable. We believe a half day should be appropriate to obtain the information we need on FSAR update; the remaining time can be spent on discussions and demonstration of your systems to track or retrieve the CLB-type information.

The Commission in its November 1991 direction to the staff also established a pilot program for voluntary participation by licensees to compile their CLB. On March 19, 1992, NRC issued Generic Letter 92-03 on this subject, and we will be glad to answer questions on the Generic Letter. Our visit should not be construed as soliciting participation in the pilot program.



Mr. Gregory M. Rueger

- 3 -

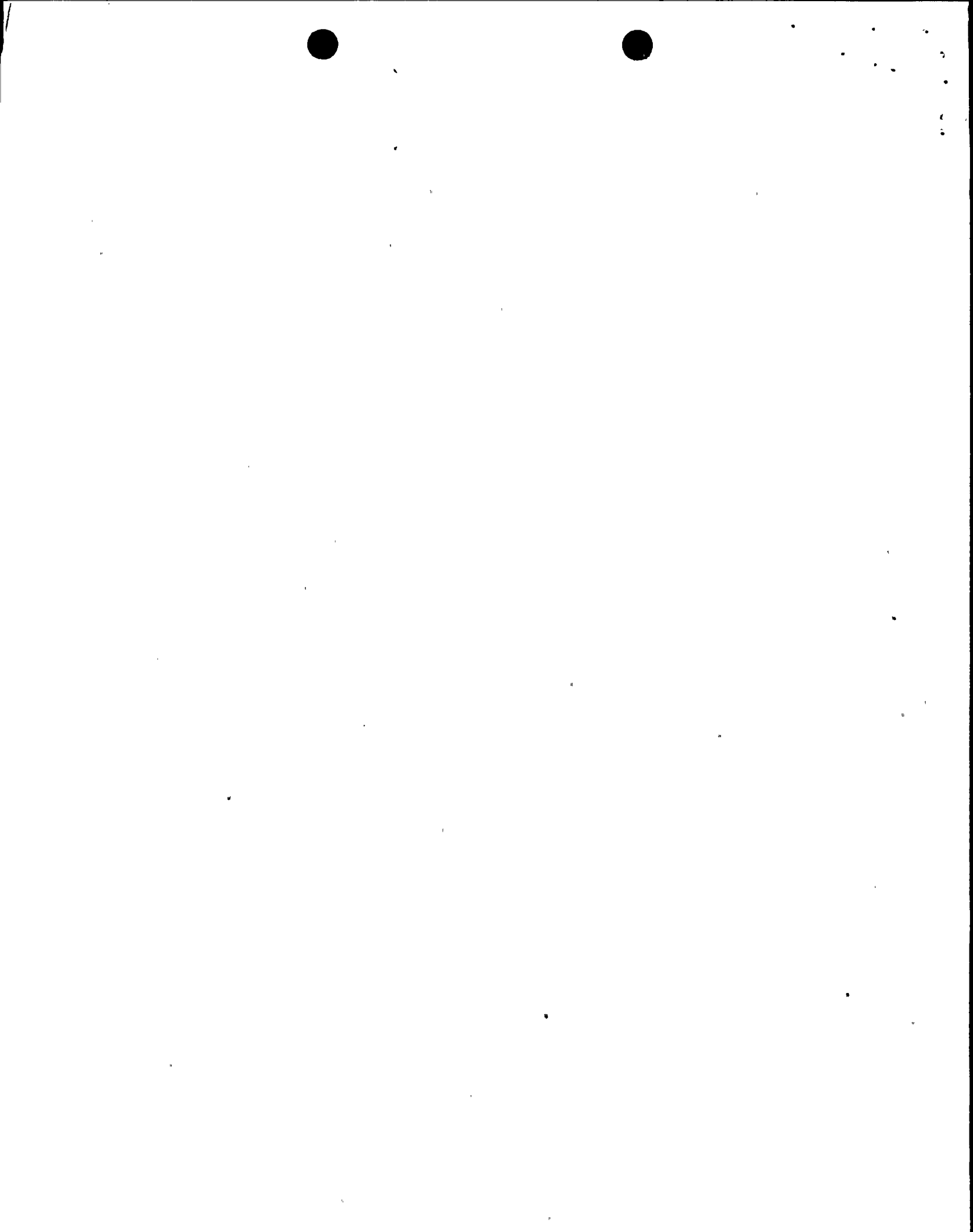
The objective of our request is to determine the facts about FSAR updates and to obtain information concerning your current licensing basis tracking and documentation systems. There is no request for information and no new information is to be developed for our discussions. The information that we have requested should be made available for the discussion and readily accessible from your files. Therefore, no OMB clearance is deemed warranted. If you have questions about this or any other matter regarding our request, please let us know. I am available to answer questions or you may address generic questions to Dave Wigginton at (301) 504-1301.

Sincerely,



Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page



May 6, 1992

Mr. Gregory M. Rueger

- 3 -

The objective of our request is to determine the facts about FSAR updates and to obtain information concerning your current licensing basis tracking and documentation systems. There is no request for information and no new information is to be developed for our discussions. The information that we have requested should be made available for the discussion and readily accessible from your files. Therefore, no OMB clearance is deemed warranted. If you have questions about this or any other matter regarding our request, please let us know. I am available to answer questions or you may address generic questions to Dave Wigginton at (301) 504-1301.

Sincerely,

Ted Quay for

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

DISTRIBUTION

Docket File

- NRC & Local PDRs
- PDV Reading File
- J. Partlow, 12G18
- B. Boger
- M. Virgilio
- T. Quay
- H. Rood
- C. Regan
- D. Foster
- D. Wigginton
- R. Twigg
- OGC
- ACRS (10) P315
- PDV Plant File
- R. Zimmerman, RV

OFC
NAME
DATE

PDV/LA *date*
DFoster
5/6/92

PDV/PM *me*
HRood *for*
5/6/92

PDV/D *me*
TQuay *me*
5/6/92

OFFICIAL RECORD COPY

Document Name: DCCOMJC.LTR



11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200

201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300

301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400

Mr. Gregory M. Rueger
Pacific Gas and Electric Company

Diablo Canyon

cc:
NRC Resident Inspector
Diablo Canyon Nuclear Power Plant
c/o U.S. Nuclear Regulatory Commission
P. O. Box 369
Avila Beach, California 93424

Mr. John Hickman
Senior Health Physicist
Environmental Radioactive Mgmt. Unit
Environmental Management Branch
State Department of Health Services
714 P Street, Room 616
Sacramento, California 95814

Dr. Richard Ferguson, Energy Chair
Sierra Club California
6715 Rocky Canyon
Creston, California 93432

Regional Administrator, Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Ms. Sandra A. Silver
Mothers for Peace
660 Granite Creek Road
Santa Cruz, California 95065

Mr. Peter H. Kaufman
Deputy Attorney General
State of California
110 West A Street, Suite 700
San Diego, California 92101

Ms. Jacquelyn C. Wheeler
3303 Barranca Court
San Luis Obispo, California 93401

Ms. Nancy Culver
192 Luneta Street
San Luis Obispo, California 93401

Managing Editor
The County Telegram Tribune
1321 Johnson Avenue
P. O. Box 112
San Luis Obispo, California 93406

Michael M. Strumwasser, Esq.
Special Assistant Attorney General
State of California
Department of Justice
3580 Wilshire Boulevard, Room 800
Los Angeles, California 90010

Chairman
San Luis Obispo County Board of
Supervisors
Room 370
County Government Center
San Luis Obispo, California 93408

Richard F. Locke, Esq.
Pacific Gas & Electric Company
Post Office Box 7442
San Francisco, California 94120



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100