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SUBJECT: Forwards response to NRC 920805 request for addl info to resolve concerns noted in License Amend Request 91-03 to Licenses DPR-80 & DPR-82, revising TS to implement GL 90-06 re resolution of GI 70 & GI 94.

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Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

October 5, 1992

PG&E Letter No. DCL-92-212



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 NRC Questions on License Amendment Request 91-03,
Revise Technical Specifications 3/4.4.4 and 3/4.4.9.3 for
Pressurizer PORVs and Block Valves per Generic Letter 90-06

Gentlemen:

On March 27, 1991, PG&E submitted License Amendment Request (LAR) 91-03 in PG&E Letter DCL-91-064. LAR 91-03 proposed to revise the Diablo Canyon Technical Specifications (TS) to implement the recommendations of NRC Generic Letter (GL) 90-06, "Resolution of Generic Issue 70 'Power-Operated Relief Valve and Block Valve Reliability' and Generic Issue 94 'Additional Low-Temperature Overpressure Protection (LTOP) for Light-Water Reactors' Pursuant to 10 CFR 50.54(f)."

NRC letter dated August 5, 1992, identified three concerns regarding the NRC review of LAR 91-03 and requested that PG&E address the concerns. These concerns involved surveillance testing of the power-operated relief valves (PORVs), the modes during which the testing is performed, and related allowed outage times. Responses to the three NRC concerns are enclosed, along with revised replacement pages for TS 4.4.4.1, 4.4.4.3, and 3.4.9.3

Additional clarification on applicability has been added to TS 3.4.9.3. The reference to Mode 6 has been clarified to read "Mode 6 with the reactor vessel head on and the vessel head closure bolts not fully de-tensioned." This modification is based on the absence of a mechanism to pressurize the reactor coolant system if the vessel head is on the vessel with the head closure bolts de-tensioned.

In our original responses to GL 90-06 (DCL-90-293, dated December 21, 1990, and DCL-91-064, dated March 27, 1992), PG&E stated that a 24-hour allowed outage time (AOT), proposed by the generic letter and applicable for one inoperable PORV in Modes 5 and 6 during LTOP operation, would not permit sufficient time to do a planned evolution for RCS depressurization. While PG&E originally proposed a 72-hour AOT, which is consistent with the standard AOT of 72 hours permitted for other redundant-train safety systems, we will comply with the NRC position of 24 hours on this issue.

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October 5, 1992

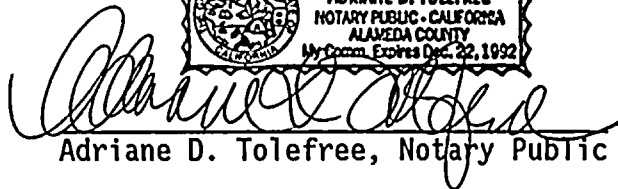
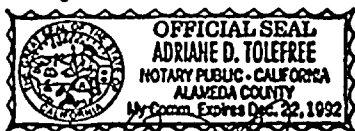
The enclosed additional information does not affect the results of the safety evaluation performed for LAR 91-03.

Sincerely,

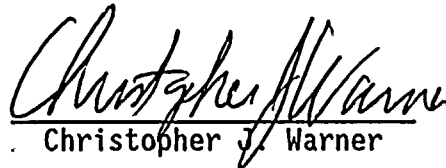


Gregory M. Rueger

Subscribed and sworn to before me
this 5th day of October 1992.


Adriane D. Tolefree, Notary Public

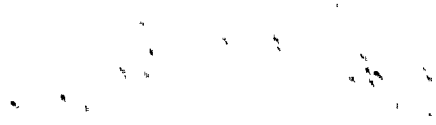
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Enclosure

1047S/85K/JCB/2232



ENCLOSURE**RESPONSE TO NRC QUESTIONS ON LAR 91-03
REVISED TECHNICAL SPECIFICATIONS FOR
PRESSURIZER PORVS AND BLOCK VALVES PER GENERIC LETTER 90-06****NRC Concern**

The staff position requires that valves in PORV control air systems be included within the scope of a program covered by Subsection IWV of Section XI of the ASME Boiler and Pressure Vessel Code. The PG&E submittal did not adequately meet this Staff position. Specifically, the PG&E safety evaluation states that proper operation of the solenoid valve is verified by stroke testing of the PORV. However, the Staff does not accept the position that successful completion of the PORV stroke test indirectly verifies operability of the control air valves. Discuss how PG&E intends to verify the capability of the valves in the safety backup supply.

PG&E Response

Technical Specification (TS) 4.4.4.3 has been added to satisfy the NRC concern.

NRC Concern

The Staff position requires the 18-month PORV stroke test to be performed during Mode 3 (Hot Standby) or Mode 4 (Hot Shutdown) and, in all cases, prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. PG&E's proposed TS Surveillance Requirement 4.4.4.1 does not specify mode. Discuss how PORV stroke testing provides assurance that the PORVs will perform all necessary safety functions adequately at the required system operating conditions.

PG&E Response

TS 4.4.4.1.a has been revised to satisfy the NRC concern.

NRC Concern

The staff review determined that PG&E has significantly modified the Staff's model TS given in GL 90-06. Specifically, PG&E proposed a 72-hour allowed outage time for restoring a PORV to operability in Modes 5 or 6, whereas the generic letter recommends 24 hours. Either revise the proposed TS or provide significant technical justification to support this modification.

PG&E Response

TS 3.4.9.3 has been revised to satisfy the NRC concern.

1047S/85K

