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SUBJECT: Clarifies commitment for emergency core cooling & safe shutdown electrical loading from suppl vital inverter buses, per 821229 License Amend Request 82-09 to Licenses DPR-80 & DPR-82.

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Senior Vice President and  
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Nuclear Power Generation

December 24, 1992

PG&E Letter No. DCL-92-287



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  
Clarification of Commitment for Emergency Core Cooling and Safe  
Shutdown Electrical Loading from the Supplemental Vital Inverter  
Busses

Gentlemen:

In PG&E letter dated December 29, 1982 (License Amendment Request 82-09, "Modifications to Vital 120 VAC Inverters and Associated Busses"), PG&E proposed a unique 4-hour Allowed Outage Time (AOT) for the supplemental vital inverters and busses. LAR 82-09 stated that "the supplemental inverter and associated bus loading configuration is such that equipment assigned to these busses is not required for ECCS actuation or safe shutdown." PG&E provided additional information regarding LAR 82-09 in a letter dated September 12, 1983, to affirm conformance with General Design Criterion 17 (GDC 17), single failure criteria, vital battery loads, and environmental qualification of the additional inverters.

The NRC approved the addition of the supplemental vital inverters and busses by issuance of License Amendment No. 7 (LA-7) to Facility Operating License No. DPR-76 (Diablo Canyon Nuclear Power Plant, Unit 1). The Safety Evaluation Report (SER) for LA-7 restated that "the supplemental inverter and associated bus loading configuration is such that equipment assigned to these busses is not required for ECCS actuation or safe shutdown." However, LA-7 issued a 2-hour AOT (instead of the proposed 4-hour AOT), making the supplemental inverter AOT identical to that of the vital inverters and busses.

PG&E installed the supplemental inverters and busses in accordance with the plant design requirements applicable to the vital inverters and busses. Qualification, electrical isolation, operation, maintenance and surveillance of the vital and supplemental vital inverters and busses are identical. The supplemental inverters are currently supplying Class 1E and non-Class 1E electrical loads.

PG&E originally proposed not allowing ECCS loads on the supplemental inverters as the basis to justify the unique 4-hour AOT. Since LA-7 resulted in identical AOTs for both the supplemental and vital

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inverters, the basis for not assigning ECCS or safe shutdown loads to the supplemental inverters was no longer applicable. PG&E believes that the LA-7 SER reference to ECCS and safe shutdown loading was descriptive of the design and does not restrict future ECCS and safe shutdown loads from being added to the supplemental inverters.

PG&E intends to install electrical loads to the supplemental vital bus for the sixth diesel generator (D/G) during the Unit 2 fifth refueling (2R5). This electrical load will be provided to control and alarm functions for the new sixth D/G which will be credited, following installation, for safe shutdown functions following a loss of offsite power.

PG&E has performed a 10 CFR 50.59 evaluation of this change and has concluded that the proposed change does not constitute an unreviewed safety question or require a change to the DCCP Technical Specifications.

Should you have any questions regarding the commitment revision, please notify us at your earliest convenience.

Sincerely,



Gregory M. Rueger

cc: Ann P. Hodgdon  
John B. Martin  
Mary H. Miller  
Sheri R. Peterson  
CPUC  
Diablo Distribution

5950S/85K/DDM/1073



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