

ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In The Matter of
PACIFIC GAS AND ELECTRIC COMPANY

Diablo Canyon Power Plant
Units 1 and 2

) Docket No. 50-275
) Facility Operating License
) No. DPR-80

) Docket No. 50-323
) Facility Operating License
) No. DPR-82

License Amendment Request No. 93-06

Pursuant to 10 CFR 50.90, Pacific Gas and Electric Company hereby applies to amend its Diablo Canyon Power Plant Facility Operating License Nos. DPR-80 and DPR-82 (Licenses). The proposed changes revise the Technical Specifications (Appendix A of the Licenses) 1.44, 3/4.11, and 6.0. 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 or an unreviewed environmental question. Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes.

Sincerely,

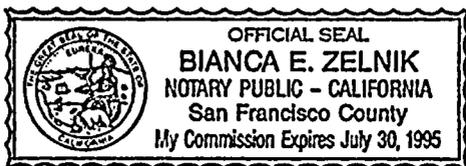
Gregory M. Rueger

Subscribed and sworn to before me
this 8th day of September 1993.

Attorneys for Pacific Gas and
Electric Company
Howard V. Golub
Christopher J. Warner
Richard F. Locke

Bianca E. Zelnic, Notary Public

Richard F. Locke



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ATTACHMENT A

REVISION OF TECHNICAL SPECIFICATION 1.44, 3/4.11, and 6.0 -
ORGANIZATIONAL AND ADMINISTRATIVE CHANGES

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specifications (TS) as follows:

1. TS 6.2.3, "Onsite Safety Review Group (OSRG)," would be deleted and replaced by TS 6.5.4, "Independent Technical Review Responsibilities." The requirements of the TS would be revised to incorporate organizational changes as follows:
 - a. The requirement to maintain a five-person OSRG organization would be deleted;
 - b. Independent Technical Reviewer responsibilities would include making recommendations to the Senior Vice President and General Manager, Nuclear Power Generation;
 - c. Qualification requirements would be identified for personnel performing the responsibilities and functions of an Independent Technical Reviewer;
 - d. A Records section would be added to maintain written records of technical reviews; and
 - e. The format of the TS would be changed to be consistent with the Westinghouse Standard TS (NUREG-1431).
2. TS 6.5.3.7, "Nuclear Safety Oversight Committee Review," would be revised to replace a reference to the OSRG with the Independent Technical Review Program.
3. TS 6.5.2, "Plant Staff Review Committee (PSRC)," would be revised to delete the requirement that members of the PSRC be plant management individuals.
4. Administrative changes would be made to TS 1.44, "Radiological Monitoring and Controls Program," 3.11.1.4, "Liquid Holdup Tanks," 3.11.2.6, "Gas Storage Tanks," and 6.14, "Radiological Monitoring and Controls Program (RMCP), Offsite Dose Calculation Procedure (ODCP) and Environmental Radiological Monitoring Procedure (ERMP)," to replace references to the Semiannual Radioactive Effluent Release Report with Annual Radioactive Effluent Release Report.

Changes to the TS are noted in the marked-up copy of the applicable TS (Attachment B).



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B: BACKGROUND

NUREG-0737 included a requirement, which applied to all applicants for an operating license, to establish an onsite independent safety engineering group (ISEG) to perform independent reviews of plant operations. A summary of the NUREG-0737 requirements is as follows. The ISEG shall consist of five dedicated, full-time engineers, located onsite, but reporting to a corporate official who holds a high-level, technically oriented position that is not in the management chain for power production. The ISEG will provide a continuing, systematic, and independent technical assessment of plant activities.

NUREG-0737 also indicates that the principle function of the ISEG is to examine sources of plant design and operating experience information that may indicate areas for improving plant safety. The ISEG is to perform independent reviews and audits of plant activities. The group will develop and present detailed recommendations to corporate management in areas such as revised procedures and equipment modifications. Another function of the ISEG is to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and human errors are reduced as far as practicable.

NUREG-0737 also stated that it is expected that the ISEG may interface with the Quality Assurance (QA) organization, but preferably should not be an integral part of the QA organization.

PG&E's on-site safety review group (OSRG) was established in response to the NUREG-0737 requirement to form an ISEG. The OSRG currently reports to the Manager, Nuclear Safety and Regulatory Affairs (Manager, Nuclear Regulatory Services in the revised NPG organization). The OSRG provides the review functions stated above. These review functions are redundant to those performed by other existing on-site and off-site review groups.

The five-member OSRG is comprised of three full-time engineers plus the supervisor of QA and a Shift Technical Advisor from the plant staff. Collectively the OSRG members have expertise in the areas of nuclear engineering, nuclear plant operations, radiation protection, plant mechanical and electrical systems, instrumentation and controls, and quality assurance. The NRC found this response acceptable in Supplement 10 to the Diablo Canyon Power Plant (DCPP) Safety Evaluation Report.

C. JUSTIFICATION

As part of recent PG&E Nuclear Power Generation (NPG) organizational changes, NPG quality services organizations have been consolidated within the new Nuclear Quality Services (NQS) department. These changes were made to promote a stronger, more efficient quality function in NPG.

Prior to the NPG organizational changes, PG&E's quality services groups reported through both DCPP and General Office management. This structure caused the quality services groups to be located within several departments in NPG. Consolidation of quality services will combine similar functions



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and enhance communication and coordination. Duplication of QA and Quality Control (QC) activities will be eliminated to increase efficiencies by integrating activities.

As a result of the proposed change, OSRG review responsibilities will be incorporated into the NQS department. The NQS department also includes the PG&E QA, QC, and other nuclear safety engineering functions. The Manager, NQS, reports to the Senior Vice President and General Manager, Nuclear Power Generation. The Manager, NQS, is located on site, but not in the management chain for power production. NQS Independent Technical Review personnel are located on site and report through the Director, Nuclear Safety Engineering, to the Manager, NQS.

The proposed changes to TS 6.2.3 delete the requirement to maintain an on-site, five-person OSRG organization that is dedicated to performing independent technical reviews. Current TS requirements do not provide flexibility in the performance of required reviews. These proposed revisions maintain the requirement to perform the reviews specified in the current TS 6.2.3 and require that the reviews be performed by personnel who are independent of the plant management chain. TS 6.2.3 requirements would be moved to TS 6.5, "Review and Audit." Moving these requirements to the Review and Audit section provides a more appropriate location for the requirements and is consistent with NUREG-1431.

The current requirements of TS 6.2.3 place constraints on PG&E by requiring the establishment of a separate organization, composed of at least five engineers, to perform independent technical reviews. This constraint places unnecessary limitation on PG&E's utilization of its technical resources because it requires some duplicate reviews.

The NRC and the nuclear industry also have recognized that the current ISEG TS does not provide flexibility and significantly constrains the ability of a licensee to utilize its resources most effectively. This Specification was reviewed during the development of the Westinghouse Standard TS (NUREG-1431). With the issuance of NUREG-1431, the ISEG Specification has been replaced by a substantially more flexible Specification that continues to require the reviews, which are currently specified in TS 6.2.3, to be performed. However, NUREG-1431 deletes the requirement for the establishment of a five-person organization assigned to perform the specified reviews.

In addition, the NRC's Regulatory Review Group issued Special Report 93-045, noticed in the Federal Register for public comment on May 28, 1993, which included an examination of Seabrook Unit 1 TS 6.2.3, "Independent Safety Engineering Group (ISEG)." The Regulatory Review Group chose this item for review because it is very prescriptive with regard to manpower requirements. The Regulatory Review Group assessment noted that in NUREG-1431, the ISEG has been replaced with an independent review function which provides a relaxation of the five-person staffing requirement and permits more flexible methods of performing the reviews. The Regulatory Review Group stated that this flexibility includes the establishment of standing or ad hoc committees



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Further, the Regulatory Review Group noted that a TS change could be submitted adopting the NUREG-1431 approach, thereby providing considerable flexibility in the implementation of what is currently the ISEG review requirement.

These changes are consistent with the Proof and Review TS for Watts Bar Unit 1 (NRC Docket No. 50-390) and Westinghouse Standard TS. These changes are similar to an LAR submitted by Seabrook Unit 1.

The NPG QC organizations will be consolidated and report to the Manager, NQS. Having all NPG QC organizations report to the Manager, NQS, will result in more independence for the QC organizations. Since the DCPD QC organization will now report to the Manager, NQS, the Director, QC, will no longer be a "plant" management individual. The requirement that the members of PSRC be "plant" management would be deleted to make it clear that a senior management member of PG&E's quality organization can be represented on the PSRC. These changes will provide continued assurance of a broad, multidiscipline review of plant activities.

Additionally, due to an administrative oversight, PG&E omitted changing references to the Semiannual Radioactive Effluent Release Report contained in TS 1.44, 3.11.1.4, 3.11.2.6 and 6.14.2 when LAR 92-10 (PG&E Letter No. DCL-92-283, dated December 22, 1992) was submitted to the NRC. License Amendments (LA) 78 and 77 changed the frequency of the Radioactive Effluent Release Report from semiannual to annual. This correction is administrative in nature.

C. SAFETY EVALUATION

The proposed revision to TS 6.2.3 deletes the requirement to maintain a five-member OSRG. However, the revised TS 6.5.4 maintains the requirement to perform the reviews specified in the current TS and requires that the reviews be performed by personnel who are independent of the plant management chain. In order to ensure the maintenance of highly-qualified technical reviewers, qualification requirements for personnel performing reviews pursuant to the Independent Technical Review Program are established by this LAR as 3 years of related experience and a baccalaureate degree in engineering or related field, or 8 years of related experience. These qualifications are consistent with the requirements in ANSI/ANS 3.1-1978 Section 4.7, to which DCPD is required to comply.

The proposed change to TS 6.5.2 to delete the requirement that members of PSRC be "plant" management individuals is administrative in nature and based on NPG organizational changes. This change provides continued assurance of effective performance of PSRC responsibilities and authorities.

The Semiannual Radioactive Effluent Release Report was changed to an Annual Radioactive Effluent Release Report in LA 79/78. This is an administrative change. Since this proposed change has no effect on any plant system or the safe operation of DCPD, the change is not considered to have any safety significance. This change does, however, clarify the TS by correcting the reference.



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In conclusion, PG&E believes there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed TS changes.

D. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant 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 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 are administrative in nature, should result in improved administrative practices, and do not affect plant operations.

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 changes are administrative in nature, do not result in physical alterations or changes to the operation of the plant, and cause no change in the method by which any safety-related system performs its function.

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?

The proposed change is administrative in nature and does not affect margin of safety.



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Therefore, the proposed change does not involve a significant reduction in a margin of safety.

E. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

In conclusion, based on the above evaluation, PG&E concludes that the activities associated with this proposed LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

F. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined that the changes relate to changes in administrative requirements. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10)(ii). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.



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