

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. 94-03

Pursuant to 10 CFR 50.90 and 10 CFR 50.12, Pacific Gas and Electric Company hereby applies to amend its Diablo Canyon Power Plant Facility Operating License Nos. DPR-80 and DPR-82 (Licenses) and requests a partial exemption from the requirements of 10 CFR 50, Appendix J. The proposed changes to the Licenses would revise Technical Specification (Appendix A of the Licenses) 4.6.1.2.

Information on the proposed changes and exemption request is provided in Attachments A, B, and C.

The requested changes have been reviewed and do not 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 to the Licenses or the requested partial exemption.

Sincerely,

Gregory M. Rueger

Subscribed and sworn to before me
this 16th day of February 1994.

Attorneys for Pacific Gas
and Electric Company
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Amy Emiko Dong, Notary Public
AMY EMIKO DONG
NOTARY PUBLIC - CALIFORNIA
CITY & COUNTY OF SAN FRANCISCO
My Commission Expires Dec. 23, 1994

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ATTACHMENT A

REVISION OF TECHNICAL SPECIFICATION 4.6.1.2 - REVISE CONTAINMENT LEAKAGE TYPE A TEST SCHEDULE

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specification (TS) 4.6.1.2, "Containment Integrity," as follows:

- a. The requirement to conduct three Type A tests specifically at 40 ± 10 month intervals during each 10-year service period would be replaced with a requirement to conduct three Type A tests at approximately equal intervals during each 10-year service period.
- b. The requirement to conduct the third Type A test of each set during the shutdown for the 10-year plant inservice inspection would be deleted.

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

B. BACKGROUND

The current TS 4.6.1.2 Type A testing interval requires that three tests be performed on a frequency of 40 ± 10 months during each 10-year service period, with the third test in each set to be conducted during the shutdown for the 10-year plant inservice inspection (ISI).

Appendix J to 10 CFR 50 states in part, "...a set of three Type A tests shall be performed, at approximately equal intervals during each 10-year service period. The third test of each set shall be conducted when the plant is shutdown for the 10-year plant inservice inspections."

For plants such as Diablo Canyon Power Plant (DCPP), which operate on an 18-month fuel cycle, each 10-year ISI period consists of between six and seven 18-month cycles, or approximately 9 and 10.5 calendar years, respectively. Therefore, within the 1-year schedule allowance of the ASME Boiler and Pressure Vessel Code, Section XI, IWA-2400(c), the "10-year" ISI interval could end between 9 and 11 calendar years, and is most likely to occur near calendar year 9 or 10.5, depending on the ISI schedule. Additionally, there is no "shutdown for the 10-year plant inservice inspection" since the ASME Code requires testing to be performed throughout the 10-year period.



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C. JUSTIFICATION

The TS 4.6.1.2a. Type A testing schedule of 40 ± 10 month intervals provides only a 20-month window for scheduling Type A tests. For units operating on 18-month fuel cycles, the first and second Type A tests of each period must be conducted every other refueling outage to be within the 30-month to 50-month range allowed by the TS. But then, the third Type A test cannot be conducted during a scheduled refueling outage, which meets the TS requirements of being conducted coincident with the shutdown for the 10-year ISI, and be within a 40 ± 10 month interval of the second Type A test.

In accordance with the current TS.4.6.1.2 schedule requirement of 40 ± 10 month intervals, a Type A test is currently scheduled for the Unit 1 sixth refueling outage in March 1994. However, the first 10-year ISI interval for Unit 1 will end after the seventh refueling outage (10.5 calendar years), and the first 10-year ISI period for Unit 2 will end after the seventh refueling outage (10.17 calendar years). Since the TS also requires a Type A test to be performed coincident with the shutdown for the 10-year plant ISI, a Type A test also would be required for the Unit 1 seventh refueling outage, which would total four Type A tests in the 10-year period. Over the 40-year life of the plant, this would result in four additional Type A tests for Unit 1 and three additional Type A tests for Unit 2 (due to a short Unit 2 first operating cycle, the third test for Unit 2 is scheduled to coincide with the 10-year ISI). A license amendment and exemption from the 10 CFR 50, Appendix J requirement for a Type A test during the 10-year plant ISI would eliminate unnecessary testing, allow more flexible scheduling of Type A testing, and would result in a reduction of radiation exposure to plant personnel. Personnel radiation exposure results from equipment and valve alignments necessary to perform the test.

Replacing the 40 ± 10 month scheduling requirement with a requirement for three Type A tests to be conducted at approximately equal intervals would allow for more flexible scheduling of Type A testing to accommodate 18-month or 24-month fuel cycles and is consistent with the specifications of 10 CFR 50, Appendix J, Section III.D.1.(a).

The 10-year plant ISI is the series of inspections performed every 10 years in accordance with Section XI of the ASME Code and Addenda, as required by 10 CFR 50.55a. However, PG&E performs the ISI volumetric, surface, and visual examinations of components and system pressure tests in accordance with 10 CFR 50.55a(g)(4) throughout the 10-year inspection interval. As a result, there is no specific outage in which all 10-year ISI examinations are performed.

The proposed change to delete the Type A test schedule interval of 40 ± 10 months is similar to a license amendment issued for North Anna Units 1 and 2 and an LAR submitted for St. Lucie Units 1 and 2. The proposed change to uncouple the Type A testing and the 10-year ISI schedule requirements is similar



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to a license amendment issued for Clinton Unit 1 and LARs submitted for Grand Gulf Unit 1 and Kewaunee.

In support of this LAR, a request for partial exemption from the Type A test schedule requirements of Appendix J to 10 CFR 50 is provided in Attachment C.

D. SAFETY EVALUATION

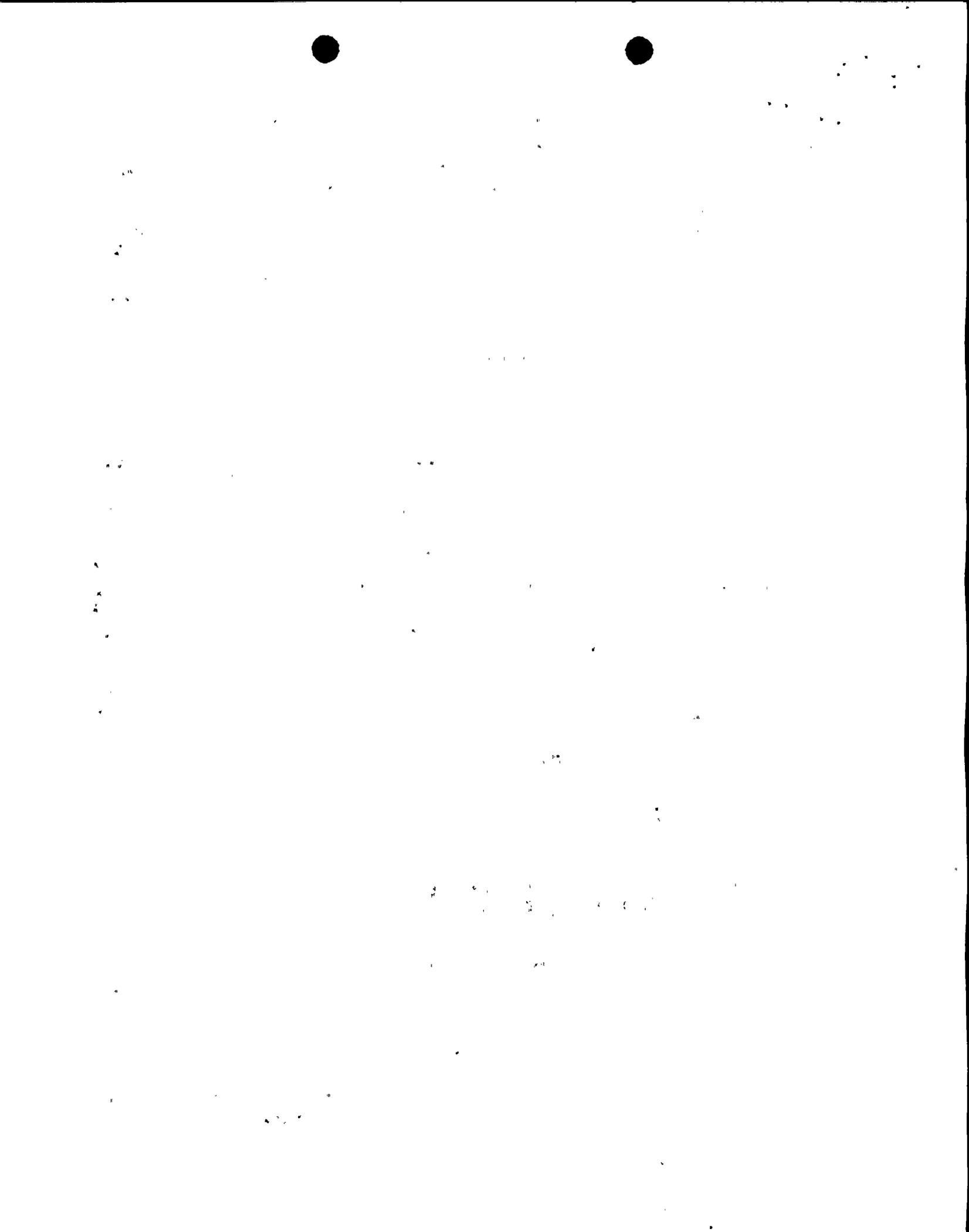
Containment leakage is limited to ensure that design basis accident offsite doses remain acceptable. Periodic containment leak rate tests are performed to ensure that containment leakage remains within acceptable limits.

Type A testing and 10-year ISI programs are independent of each other and provide surveillances for different plant characteristics. The Type A testing assures the required leak-tightness to demonstrate compliance with the guidelines of 10 CFR 100. The 10-year ISI program provides assurance of the integrity of the structures, systems, and components and verifies the operational readiness of pumps and valves in compliance with 10 CFR 50.55a. Since Type A testing and ISI requirements are not intended to test the same function, coupling these requirements offers no safety benefit for DCPD.

The number of Type A tests is not affected by the proposed changes, since the requirement to conduct three Type A tests over each 10-year service period would not be changed. Only the detailed scheduling requirements for Type A testing would be changed to provide more flexibility in scheduling these tests. The maximum interval between Type A tests will be no greater than three 18-month fuel cycles, or 4.5 years. This is consistent with the 10 CFR 50 Appendix J statement that the three Type A tests should be conducted at approximately equal intervals.

Furthermore, the maximum allowable leakage rate at the calculated peak containment pressure has not changed. The proposed changes do not impact the design basis of the containment and would not change the response of containment during a design basis accident.

The first two Type A tests of the first 10-year service period for DCPD Units 1 and 2 have been conducted. The leakage rates were calculated with a 95 percent upper confidence level (measured leakage rates were lower). For Unit 1, the leakage rates were calculated as 0.073 weight percent per day during the second refueling outage and 0.068 weight percent per day during the fourth refueling outage. For Unit 2, the leakage rates were calculated as 0.053 weight percent per day during the third refueling outage and 0.051 weight percent per day during the fifth refueling outage. These leakage rates are within the surveillance acceptance criteria of 0.075 weight percent per day and demonstrate that DCPD has maintained good control of containment integrity.



In addition, the most likely locations for the development of leakage paths through containment are through containment penetrations and isolation valves, which are tested by the local leakage rate tests (Type B and Type C tests). Type B and Type C tests, as required by TS 4.6.1.2d., are conducted at intervals of no greater than 24 months. Type B and Type C tests also provide assurance that containment integrity is maintained. Type B and Type C testing leakage rates have averaged (over 10 refueling cycles) between 0.1 and 0.25 times the allowable combined leakage rate of 0.060 weight percent per day. No changes to the Type B and Type C testing are proposed by this LAR.

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.

E. NO SIGNIFICANT HAZARDS

PG&E has evaluated the no significant hazards 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 a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or 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 no significant hazards considerations.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes do not affect the initiation of any accident, nor do the proposed changes involve modifications to any plant equipment.

The proposed change to the schedule provides flexibility in meeting the current requirement for 3 tests in 10 years and is consistent with the intent of the 10 CFR 50, Appendix J requirement to perform Type A tests at approximately equal intervals. The test type and test method used for Type



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A testing would not be changed. The Type A test acceptance criteria would not be changed, and containment leakage will continue to be maintained within the required limits.

Elimination of the requirement to perform the third Type A test during the shutdown for the 10-year plant ISI does not involve any modification to plant equipment or affect the operation or design basis of the containment. These surveillances are independent of each other and provide assurance of different plant characteristics. The Type A tests assure the required leak-tightness of the containment to demonstrate compliance with the guidelines of 10 CFR 100. The 10-year ISI program provides assurance of the integrity of plant structures, systems, and components and verifies the operational readiness of pumps and valves in accordance with 10 CFR 50.55a.

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 do not involve modifications to any existing equipment or affect the operation or design basis of the containment. The proposed changes do not affect the response of the containment during a design basis accident.

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 changes to the schedule provide flexibility in meeting the Type A testing schedule requirements. These proposed changes do not affect or change any limiting conditions for operation (LCO) or any other surveillance requirements in the TS and the Bases for the surveillance requirement remains unchanged. The testing method, acceptance criteria, and bases are not changed and still provide assurance that the containment will perform its intended function.

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 safety 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.



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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 change meets the eligibility criteria 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 change is not required.

