

# CATEGORY 1

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50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323  
AUTH. NAME      AUTHOR AFFILIATION      *See Proposed*  
RUEGER, G.M.      Pacific Gas & Electric Co.      *Change to*  
RECIP. NAME      RECIPIENT AFFILIATION      *Total Specs*  
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SUBJECT: Forwards response to NRC RAI re licensee proposed conversion to ITS Sections 1.0, 3.2, 3.3, 3.4, 3.6, 3.9 & 5.0. Encl provides addl info or supporting documentation, answers to follow-up questions or addl changes to TS identified by licensee.

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Electric Company**

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February 24, 1999

PG&E Letter DCL-99-028

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2

Follow-up Items Related to Proposed Conversion to the Improved Technical Specifications  
Sections 1.0, 3.2, 3.3, 3.4, 3.6, 3.9, and 5.0

Dear Commissioners and Staff:

PG&E submitted a license amendment request (Reference 1) for Diablo Canyon Power Plant (DCPP), Units 1 and 2, to convert the current DCPP Technical Specifications (TS) to a set of TS based upon the improved standard TS. PG&E submitted an errata to Reference 1 as noted in Reference 2. References are identified in Attachment A.

The NRC staff has requested additional information regarding the improved TS (ITS) submittal in References 1 and 2. PG&E provided responses to the subject ITS sections 1.0, "Use and Application"; 2.0, "Safety Limits (SLs)"; 3.0, "Limiting Condition for Operation (LCO) Applicability and Surveillance Requirement (SR) Applicability," 3.1, "Reactivity Control Systems"; 3.2, "Power Distribution Limits"; 3.3, "Instrumentation"; 3.4, "Reactor Coolant System"; 3.5, "Emergency Core Cooling Systems"; 3.6, "Containment Systems"; 3.7, "Plant Systems"; 3.8, "Electrical Power Systems"; 3.9, "Refueling"; 4.0, "Design Features"; and 5.0, "Administrative Controls" in References 3 through 12.

The attachments to this letter provide: (1) additional information or supporting documentation not provided in the original request for additional information response, (2) answers to follow-up questions, or (3) additional changes identified by the licensee for ITS Sections 1.0, 3.2, 3.3, 3.4, 3.6, 3.9, and 5.0.

This letter and the attachments are not a supplement to Reference 1, and thus have not been reviewed and approved by DCPP's Plant Staff Review Committee. A supplement to Reference 1 will be provided at a later date. Any deviations from the responses provided in this letter will be discussed in the supplement.

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ADD 1/1

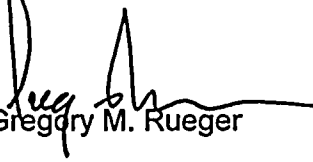
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Document Control Des.  
February 24, 1999  
Page 2

G&E Letter-DCL-99-028

Sincerely,



Gregory M. Rueger

cc: Edgar Bailey, DHS  
Steven D. Bloom  
Ellis W. Merschoff  
David L. Proulx  
Linda J. Smith  
Diablo Distribution

Attachments  
MEL/



References

1. DCL-97-106, "License Amendment Request 97-09, Technical Specification Conversion License Amendment Request," dated June 2, 1997
2. DCL-98-003, "License Amendment Request 97-09 Errata," dated January 9, 1998
3. DCL-98-087, "License Amendment Request 97-09, "Technical Specification Conversion," Response to Request for Additional Information for Section 3.6," dated June 25, 1998
4. DCL-98-107, "License Amendment Request 97-09, Technical Specification Conversion, Response to Request for Additional Information for Sections 3.1, 3.2, 3.5, 3.9, and 4.0," dated August 5, 1998
5. DCL-98-116, "License Amendment Request 97-09, Technical Specification Conversion, Response to Request for Additional Information for Sections 1.0, 2.0 and 3.0," dated August 28, 1998
6. DCL-98-134, "License Amendment Request 97-09, Technical Specification Conversion, Response to Request for Additional Information for Sections 3.4 and 5.0," dated September 25, 1998
7. DCL-98-144, "License Amendment Request 97-09, Technical Specification Conversion, Response to Request for Additional Information for Section 3.7," dated October 16, 1998
8. DCL-98-154, "Follow-up Items Related to Proposed Conversion to the Improved Technical Specifications Sections 3.1, 3.2, 3.4, and 5.0," dated October 23, 1998
9. DCL-98-167, "License Amendment Request 97-09, Technical Specification Conversion, Response to Request for Additional Information for Section 3.3," dated December 4, 1998
10. DCL-98-168, "Follow-up Items Related to Proposed Conversion to the Improved Technical Specifications Sections 1.0, 3.6, 3.9, and 5.0," dated November 25, 1998
11. DCL-98-180, "License Amendment Request 97-09, Technical Specification Conversion, Response to Request for Additional Information for Section 3.8," dated December 17, 1998
12. DCL-98-185, "Follow-up Items Related to Proposed Conversion to the Improved Technical Specifications Sections 1.0, 3.1, 3.2, 3.3, 3.4, 3.6, 3.9, and 5.0," dated December 30, 1998






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NUCLEAR REGULATORY COMMISSION

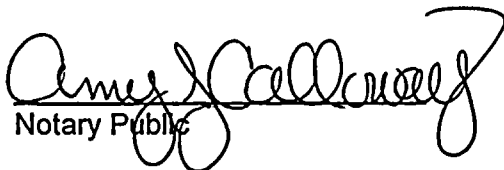
_____ )	Docket No. 50-275
In the Matter of )	Facility Operating License
PACIFIC GAS AND ELECTRIC COMPANY )	No. DPR-80
)	
Diablo Canyon Power Plant )	Docket No. 50-323
Units 1 and 2 )	Facility Operating License
_____ )	No. DPR-82

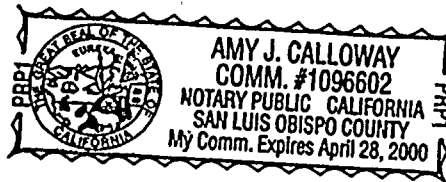
AFFIDAVIT

Gregory M. Rueger, of lawful age, first being duly sworn upon oath says that he is Senior Vice President - Nuclear Power Generation of Pacific Gas and Electric Company; that he has executed the document entitled "Follow-up Items Related to Proposed Conversion to the Improved Technical Specifications Sections 1.0, 3.2, 3.3, 3.4, 3.6, 3.9, and 5.0," on behalf of said company with full power and authority to do so; that he is familiar with the content thereof; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.

  
Gregory M. Rueger  
Senior Vice President  
Nuclear Power Generation

Subscribed and sworn to before me this 24<sup>th</sup> day of February 1999.  
County of San Luis Obispo  
State of California

  
Notary Public





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Additional Information Index

The item numbers are formatted as follows: [Source] [ITS Section]-[nnn]

Source = Q - NRC Question  
 NR - NRC Follow-up Question  
 CA - AmerenUE  
 DC - PG&E  
 WC - WCNOG  
 CP - TU Electric  
 TR - Traveler

ITS	Item Number	Applicability	Enclosed
1.0	Q 1.1-1, Q 1.1-2 (TSTF-205)	CA, CP, DC, WC	YES
3.1	CP 3.1-004 (new)	CP	NA
3.1	CP 3.1-005 (new)	CP	NA
3.1	CP 3.1-ED1 (new)	CP	NA
3.2	Q 3.2-6 (TSTF-241)	CA, CP, DC, WC	YES
3.3	Q 3-LS-GEN (TSTF-135)	CP	NA
3.3	Q 2-13	CP	NA
3.3	Q 2-32	CP	NA
3.3	Q 8-04	CA, CP, DC, WC	YES
3.3	Q 3.3.d GEN	CP	NA
3.3	Q 3.3.j	CA, CP, DC, WC	YES
3.3	Q 3.3-24	CP, DC	YES
3.3	Q 3.3-55	CA, CP, DC, WC	YES
3.3	Q 3.3-63	CA, CP, DC, WC	YES
3.3	Q 3.3-73	CP	NA
3.3	Q 3.3-78	CP	NA
3.3	Q 3.3-96	CA, CP, DC, WC	YES
3.3	Q 3.3-97	CA, CP, DC, WC	YES
3.3	CP 3.3-ED1 (new)	CP	NA
3.3	CP 3.3-ED2 (new)	CP	NA
3.3	CP 3.3-ED3 (new)	CP	NA
3.3	CP 3.3-ED4 (new)	CP	NA
3.3	CP 3.3-ED5 (new)	CP	NA
3.3	CP 3.3-ED6 (new)	CP	NA
3.3	CP 3.3-ED7 (new)	CP	NA
3.3	CP 3.3-002	CP	NA
3.3	CP 3.3-009	CP	NA
3.3	CP 3.3-010	CP	NA
3.3	CP 3.3-011	CP	NA

9903030039



ITS	Item Number	Applicability	Enclosed
3.3	CP 3.3-012 (new), (TSTF-169)	CA, CP, DC, WC	YES
3.3	CP 3.3-013 (new)	CP	NA
3.3	CP 3.3-014 (new)	CP	NA
3.3	CP 3.3-015 (new)	CP	NA
3.3	CP 3.3-016 (new)	CP	NA
3.3	CP 3.3-017 (new)	CP	NA
3.3	DC 3.3-ED1 (new)	DC	YES
3.4	3.4.11-4 (TSTF-309)	CA, CP, DC, WC	YES
3.4	3.4.12-2 (TSTF-285)	CA, DC, WC	YES
3.4	CP-3.4-005 (new)	CP	NA
3.5	CP-3.5-005 (new)	CP	NA
3.6	Q 3.6.3-23	CP, DC	YES
3.6	Q 3.6.3-54	CA, WC	NA
3.6	CA 3.6-ED1 (new)	CA	NA
3.6	CP 3.6-ED (new)	CP	NA
3.7	Q 3.7.3-2	CP	NA
3.7	Q 3.7.5-4	WC	NA
3.7	Q 3.7.16-3	CA, WC	NA
3.7	Q 3.7-ED	CP	NA
3.8	Q 3.8.1-20 CP	CP	NA
3.8	Q 3.8.2-02 CP	CP	NA
3.8	Q 3.8.4-19 CP	CP	NA
3.8	Q 3.8.10-01 CA	CA	NA
3.8	Q 3.8.10-01 CP	CP	NA
3.8	Q 3.8.10-01 WC	WC	NA
3.8	Q 3.8B-02.p	CP	NA
3.8	CP 3.8-005 (new)	CP	NA
3.8	CP 3.8-006 (new)	CP	NA
3.8	CP 3.8-007 (new)	CP	NA
3.8	CP 3.8-ED	CP	NA
3.9	Q 3.9-1a (TSTF-272)	CA, CP, DC, WC	YES
5.0	Q 5.2-1 (TSTF-258)	CA, CP, DC, WC	YES
5.0	Q 5.5-2 (TSTF-237)	CA, CP, DC	YES
5.0	CP 5.0-ED (new)	CP	NA



ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 1.1-1

APPLICABILITY: CA, CP, DC, WC

REQUEST:

CTS 1.3, Analog Channel Operations Test  
CTS 1.3, Channel Operational Test [Diablo Canyon]  
CTS 1.7, Channel Functional Test [Diablo Canyon]  
CTS 1.35, Trip Actuating Device Operational Test [Wolf Creek]  
CTS 1.36, Trip Actuating Device Operational Test [Callaway]  
CTS 1.37, Trip Actuating Device Operational Test [Comanche Peak]  
CTS 1.38, Trip Actuating Device Operational Test [Diablo Canyon]  
DOC 1-30-A  
ITS 1.1, Channel Operational Test (COT)  
ITS 1.1, Channel Functional Test (CFT) [Diablo Canyon]  
ITS 1.1, Trip Actuating Device Operational Test (TADOT)  
JFD 1.1-9

These are changes to both the CTS and the STS and are considered generic. Therefore, they are beyond the scope of the conversion review. The DOC states that these changes are consistent with TSTF-39, Rev.1. Also, Diablo Canyon's ITS markup appears to be in error as shown by "Channel Operational" versus "Channel Operational Test (COT)."

**Comment:** If NRC has not approved TSTF-39 by the time the draft safety evaluation is prepared, then these changes should be withdrawn from the conversion submittal at that time. These changes will not be reviewed on a plant-specific basis. In addition, correct the Diablo Canyon ITS markup for COT.

**FLOG RESPONSE (original):** TSTF-39, Rev. 1, has been withdrawn by the TSTF. However, changes addressed in TSTF-39, Rev. 1, have been subsumed by TSTF-205. Revision 1 of TSTF-205 is currently undergoing final review by the TSTF members. After final wording changes for the COT definition as well as Section 3.3 Bases changes to establish the requirements for relay contact surveillance testing (issue originally raised at Peach Bottom) are agreed upon, Revision 1 will be submitted for NRC review. The attached pages represent the definition changes to be included in Revision 1. The Section 3.3 Bases changes will be addressed under that Section's review.

**FLOG RESPONSE (supplement):** The FLOG proposes to incorporate Revision 3 of TSTF-205 which has been approved by NRC. The only changes required involve the definitions of MASTER RELAY TEST and SLAVE RELAY TEST. ITS Section 3.3 Bases changes to relax the requirements for relay contact surveillance testing, which per the traveler may be performed during COTs and TADOTs by the verification of the change of state of a single contact of the relay, have not been incorporated.





**ATTACHED PAGES:**

**CTS 1.0 - ITS 1.0**

Encl. 2      1-4, 1-6  
Encl. 5A     Traveler Status Sheet, 1.1-4 1.1-6

