

# CATEGORY 1

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        50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga     05000323  
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 OATLEY, D.H.                    Pacific Gas & Electric Co.  
 RECIPIENT NAME                RECIPIENT AFFILIATION  
                                       Records Management Branch (Document Control Desk) *See Proposed Change to 1.5.*

SUBJECT: Submits follow-up items related to proposed conversion to ITSS Sections 3.3, 3.4, 3.6, 3.8 & 3.9.

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**Pacific Gas and  
Electric Company**

**David H. Oatley**  
Vice President—Diablo Canyon  
Operations and Plant Manager

Diablo Canyon Power Plant  
P.O. Box 56  
Avila Beach, CA 93424

805.545.6000

March 10, 1999

PG&E Letter DCL-99-034

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 3.3, 3.4, 3.6, 3.8, and 3.9

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.

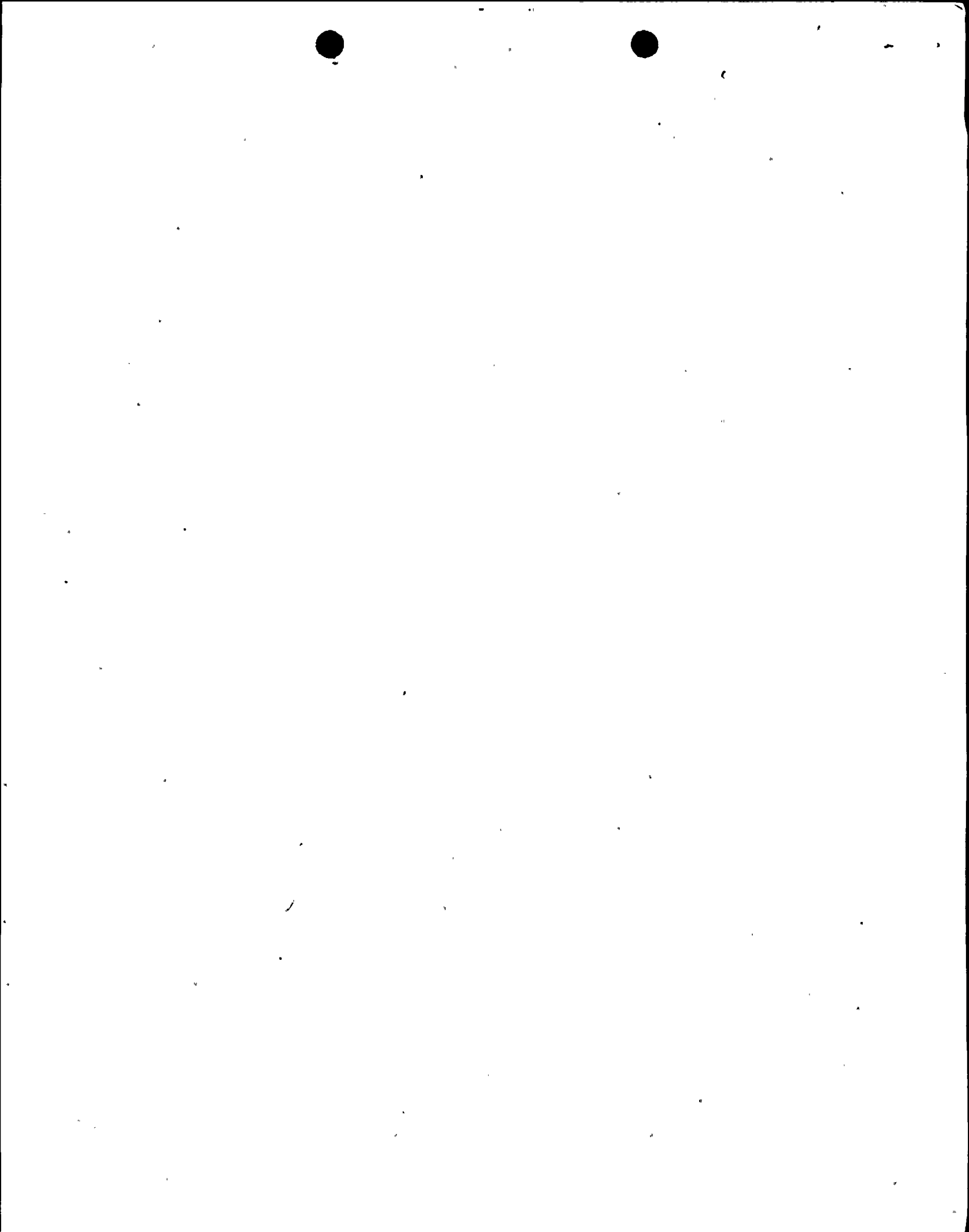
The attachments to this letter provide: (1) additional information or supporting documentation not provided in the original request for additional information response, (2) answers to follow-up questions, or (3) additional changes identified by the licensee for ITS Sections 3.3, 3.4, 3.6, 3.8, and 3.9.

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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PDR ADDCK 05000275  
P PDR

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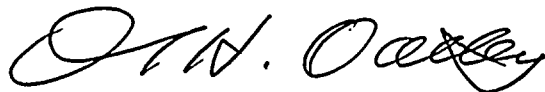
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March 10, 1999  
Page 2

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Sincerely,

A handwritten signature in cursive script, appearing to read "D.H. Oatley".

David H. Oatley

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

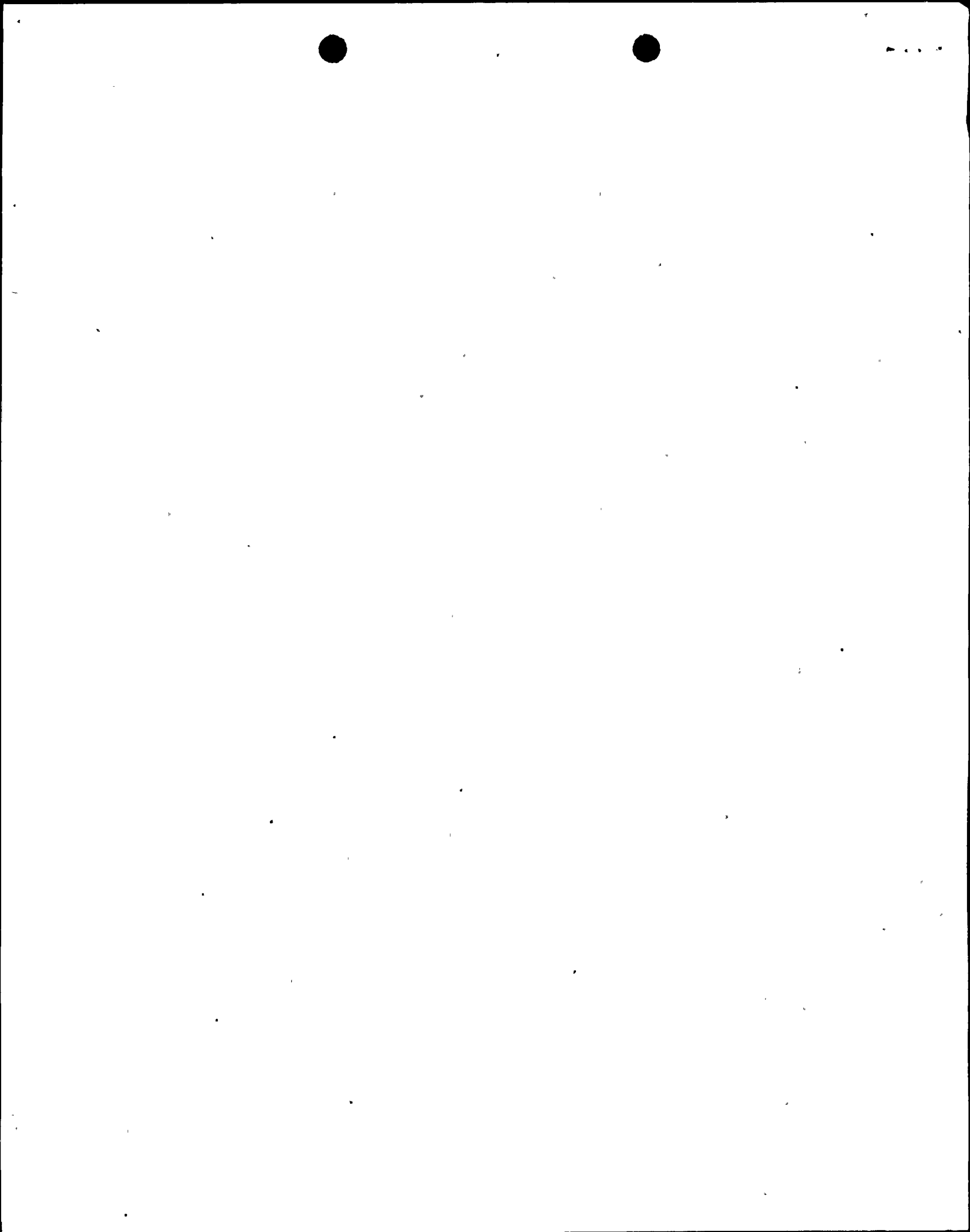
Attachments  
MEL/



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### 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.





13. DCL-99-028, "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, dated February 24, 1999.



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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

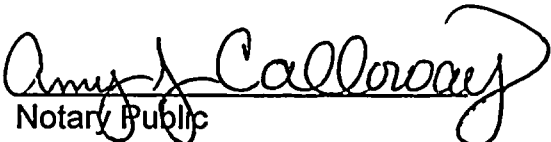
AFFIDAVIT

David H. Oatley, of lawful age, first being duly sworn upon oath says that he is Vice President - Diablo Canyon Operations and Plant Manager 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 3.3, 3.4, 3.6, 3.8, and 3.9," 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.



David H. Oatley  
Vice President  
Diablo Canyon Operations  
and Plant Manager

Subscribed and sworn to before me this <sup>11</sup>10th day of March 1999.  
County of San Luis Obispo  
State of California

  
Notary Public



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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, TSTF-205	WC	NA
3.1	WC 3.1-001 (NEW)	WC	NA
3.2	WC 3.2-002 (NEW)	WC	NA
3.3	Q 3 LS-GEN	WC	NA
3.3	Q 2-02 (3.3)	CA, WC	NA
3.3	Q 2-18	CA, WC	NA
3.3	Q 2-37	WC	NA
3.3	Q 3-01	WC	NA
3.3	Q 7-13	CA, WC	NA
3.3	Q 3.3-04	CA	NA
3.3	Q 3.3-21	CA, WC	NA
3.3	Q 3.3-30	WC	NA
3.3	Q 3.3-32	CA, WC	NA
3.3	Q 3.3-34	CA, DC, WC	YES
3.3	Q 3.3-55	CA, WC	NA
3.3	Q 3.3-80	CA, WC	NA
3.3	Q 3.3-99	CA, WC	NA
3.3	Q 3.3-135	CA, WC	NA
3.3	CA-3.3-024 (NEW)	CA	NA
3.3	CA-3.3-025 (NEW)	CA	NA
3.3	TR 3.3-007	DC	YES
3.3	WC 3.3-020 (NEW)	WC	NA
3.3	WC 3.3-021 (NEW)	WC	NA
3.3	WC 3.3-022 (NEW)	CA, DC, WC	YES
3.3	WC 3.3-023 (NEW)	WC	NA
3.3	WC 3.3-024 (NEW)	WC	NA

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ITS	Item Number	Applicability	Enclosed
3.4	Q 3.4.11-2, TSTF-288	CA, DC, WC	YES
3.4	Q 3.4.11-3, TSTF-113	CA, WC	NA
3.4	WC 3.4-011	WC	NA
3.6	Q 3.6.1-6	CA, DC	YES
3.6	Q 3.6.3-1	WC	NA
3.6	Q 3.6.3-4	CA	NA
3.6	Q 3.6.3-10	CA	NA
3.6	Q 3.6.3-11	WC	NA
3.6	Q 3.6.3-17	CA	NA
3.6	Q 3.6.3-23	CA, WC	NA
3.6	Q 3.6.3-33	CA	NA
3.6	Q 3.6.6-8	DC	YES
3.7	Q 3.7.16-3	CA, WC	NA
3.7	Q 3.7.17.1-6	CA, WC	NA
3.7	CA 3.7-005	CA	NA
3.7	CA-3.7-010 (NEW)	CA	NA
3.7	CA 3.7-011 (NEW)	CA	NA
3.7	WC-3.7-009 (NEW)	WC	NA
3.7	WC 3.7-010 (NEW)	WC	NA
3.7	WC 3.7-011	WC	NA
3.8	Q 3.8.1-09 CW	CA	NA
3.8	Q 3.8.1-12 DC	DC	YES
3.8	Q 3.8.1-12 WC	WC	NA
3.8	Q 3.8.1-15 WC	WC	NA
3.8	Q 3.8.1-18 DC	DC	YES
3.8	Q 3.8.1-27 DC	DC	YES
3.8	Q 3.8.1-29 DC	DC	YES
3.8	Q 3.8.1-33 DC	DC	YES
3.8	Q 3.8.2-04 CW	CA	NA
3.8	Q 3.8.3-06 DC	DC	YES
3.8	Q 3.8.4-08	WC	NA
3.8	Q 3.8.4-10	CA	NA
3.8	Q 3.8.4-17	WC	NA
3.8	Q 3.8.4-18	CA	NA
3.8	Q 3.8.4-29	WC	NA
3.8	Q 3.8.B-01.a	CA	NA
3.8	Q 3.8.B-01.g	CA	NA
3.8	Q 3.8.B-01.j	CA	NA





ITS	Item Number	Applicability	Enclosed
3.8	Q 3.8.B-01.p	CA	NA
3.8	Q 3.8.B-04.r	WC	NA
3.8	CA 3.8-003 (NEW)	CA	NA
3.8	DC 3.8-ED	DC	YES
3.8	WC 3.8-007 (NEW)	DC, WC	YES
3.9	WC 3.9-007(NEW)	DC, WC, CA	YES
4.0	WC 4.0-ED (NEW)	WC	NA
5.0	Q 5.2-1	CA	NA
5.0	WC 5.0-007 (NEW)	WC	NA



**ADDITIONAL INFORMATION COVER SHEET**

**ADDITIONAL INFORMATION NO: Q 3.3-34 APPLICABILITY: CA, DC, WC**

**REQUEST:**

Revisions to add an LCO 3.0.3 exception Note 1 to ITS 3.3.8 reflect industry traveler TSTF-36.

**Comment:** Reject - - The ITS proposes generic STS changes are not included in industry traveler submitted in TSTF-36 Rev 3.

**FLOG RESPONSE (original):** JFD 3.3-34 has been revised to delete the reference to TSTF-36 and replace it with a reference to the current TS. CTS 3.3.3.1 has an LCO 3.0.3 exception. ITS 3.3.8 contains the appropriate default for Required Actions and Completion Times not met, i.e., suspend irradiated fuel movement. LCO 3.0.3 would require only a plant shutdown to MODE 5, therefore, LCO 3.0.3 should not apply to ITS 3.3.8.

**FLOG RESPONSE (supplement):** Based on discussions with the NRC reviewer on February 17, 1999, Callaway, Wolf Creek, and Diablo Canyon personnel it was determined that the LCO 3.0.3 exception Note is not necessary for ITS 3.3.8. This Note is not required since the Required Actions provide appropriate remedial measures for all combinations of channel failures, reference is made to the associated plant system ITS for the system affected by the inoperability of the actuation instrumentation, and an appropriate default Condition is provided to exit this LCO's Applicability if required actions and associated Completion Times are not met.

**ATTACHED PAGES:**

CTS 3/4.3 - ITS 3.3

Encl. 2	3/4 3-36
Encl. 3A	19
Encl. 3B	24
Encl. 5A	3.3-74
Encl. 5B	B 3.3-185
Encl. 6A	3
Encl. 6B	6

