

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8802220371      DOC. DATE: 88/02/19      NOTARIZED: NO      DOCKET #  
 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga      05000275  
       50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga      05000323  
 AUTH. NAME      AUTHOR AFFILIATION  
 SHIFFER, J. D.      Pacific Gas & Electric Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to Generic Ltr 88-02, ISAP II. Addl time re potential implementation of ISAP II & ack of receipt of matl requested.

DISTRIBUTION CODE: A062D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4  
 TITLE: OR Licensing Submittal: Integrated Safety Assessment Program (ISAPII)

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1 0	NRR MILLER, M	1 1
	PD5 PD	5 5	ROOD, H	1 1
INTERNAL:	ACRS	6 6	ARM/DAF/LFMB	1 0
	NRR/DEST/ADS 7E	1 1	NRR/DEST/CEB 8H	1 1
	NRR/DEST/MTB 9H	1 1	NRR/DEST/RSB 8E	1 1
	NRR/DOEA/TSB11F	1 1	NRR/PMAS/ILRB12	1 1
	OGC 15-B-18	1 0	<u>REG FILE</u> 01	1 1
	RES/DE/EIB	1 1		
EXTERNAL:	LPDR	2 2	NRC PDR	1 1
	NSIC	1 1		



# PACIFIC GAS AND ELECTRIC COMPANY

PG&E + 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 972-7000 • TWX 910-372-6587

JAMES D. SHIFFER  
VICE PRESIDENT  
NUCLEAR POWER GENERATION

February 19, 1988

PG&E Letter No.: DCL-88-038

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  
Response to Generic Letter 88-02, Proposed ISAP II Program

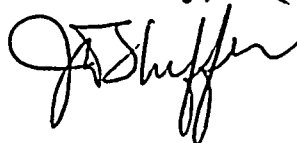
Gentlemen:

Enclosed is PG&E's response to Generic Letter 88-02, Integrated Safety Assessment Program (ISAP II).

At this time PG&E is interested in the ISAP II program and wishes to obtain more information regarding ISAP II and its implementation with licensees. While the description of the program identified many features which could be of potential benefit to PG&E, we will need additional time to determine its interest in participating in ISAP II and to evaluate our program that is in progress.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,



Enclosure

cc: J. B. Martin  
M. M. Mendonca  
P. P. Narbut  
B. Norton  
H. Rood  
B. H. Vogler  
CPUC  
Diablo Distribution

1930S/0054K/JWB/1964

8802220371 880219  
PDR ADDCK 05000275  
P PDR

A062  
11



ENCLOSURE

Integrated Safety Assessment Program (ISAP) II

Response Format to Generic Letter 88-02

Facility Name: Diablo Canyon Units 1 and 2

Utility: Pacific Gas and Electric

Individual Contact Name: Barclay S. Lew Phone Number (415) 973-1784

An expression of interest will not be considered a commitment to participate on the part of the utility.

1. Would you be interested in participating in ISAP II? If so, in what time frame?

Based upon the information presented in Generic Letter 88-02, PG&E is interested in learning more about ISAP II. When additional information, such as indicated in PG&E's response to survey question no. 4 is provided, PG&E can be more definitive in its expression of interest.

A PRA of the Diablo Canyon Power Plant is currently underway as part of PG&E's Long Term Seismic Program. Upon completion of its PRA and its review and approval by the NRC staff, PG&E will assess its interest in participating in ISAP II. The completion of the PRA is currently scheduled for the mid-1988 to mid-1989 time frame.

2. Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial prior to making a decision?

Yes, an industry/NRC seminar would be beneficial to clarify issues and would allow a more informed decision by PG&E on whether to participate.

3. Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility or facilities?

Yes, an NRC/PG&E meeting to address licensee specific benefits, issues, and implementation of ISAP II could be beneficial, after industry/NRC seminars have been conducted.

4. If you remain undecided regarding participation, what additional information do you need in order to make a decision?



PG&E wishes additional information of the type listed below to make a decision whether to participate in the ISAP II.

- Provide examples of representative license conditions.
- How will quantitative and qualitative decision criteria on prioritization and scheduling be set?
- How will issues within the uncertainty ranges or below the lower level of detail of the PRA be handled?
- Provide a description of the PRA review process.
- In the case of the Diablo Canyon PRA, would there be an additional review required for ISAP II?
- What level of document control and maintenance would be required of the PRA?
- Provide a description of actual experience with the use of PRA in technical specification changes, license amendments, exemption requests, and lower priority items which could be dropped.
- Provide a description of the recommended operating experience/data review.
- Provide a description of the interrelationship of ISAP II with pending requirements for Individual Plant Examination (IPE).
- Provide criteria for changes in NRC requirements associated with low significance events, and provide a description of the implementation of the ISAP II process for Technical Specification changes related to plant betterment or reliability enhancement.
- How will plant "aging" and plant life extension issues be addressed by ISAP II?

5. Do you have any potential concerns about participating in ISAP II?

Yes, potential concerns identified by PG&E are listed below.

- Effort may be diverted unnecessarily from the primary issues of safety, reliability and schedule to secondary details of the PRA modeling methods and data.
- Inappropriate regulatory decisions may result from inconsistent treatment of conservatism, uncertainty and assumptions (e.g. system success criteria) within models and data.





6. Do you have any suggestions for program improvements or changes?

- If a number of utilities were pursuing such a program, the feedback from both the utilities and the NRC should be beneficial. Thus, it would appear that a conscious effort to allow such feedback, including model details and component failure data, should be a part of the program.
- The process for dropping ISAP II low priority items should be reflected in streamlining the current license amendment request and exemption request process.



5 4 3 2 1