ENCLOSURE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

License Amendment Request No. 93-07

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) 3/4.7.11, 3/4.8.1, and associated Bases. 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 December 1993.

Adriane D. Tolefree, Notary Public

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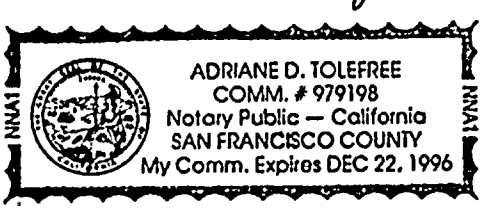

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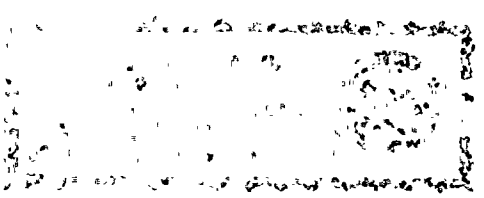

ATTACHMENT A

REVISION OF TECHNICAL SPECIFICATIONS 3/4.7.11 AND 3/4.8.1 - INCREASE EMERGENCY DIESEL GENERATOR DAY TANK CAPACITY REQUIREMENTS AND ADMINISTRATIVE CHANGES

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specifications (TS) 3/4.7.11, "Area Temperature Monitoring," and 3/4.8.1, "A.C. Sources," as follows:

1. TS 3/4.7.11 would be revised to remove references to a common (swing) diesel generator in Table 3.7-5.

2. TS 3.8.1.1 and TS 3.8.1.2 would be revised to increase the required minimum contained volume in the emergency diesel generator (EDG) engine-mounted fuel tank (day tank) from 200 gallons to 250 gallons.

3. TS 3.8.1.1 and TS 4.8.1.1.2 would be revised to remove references to a five diesel generator configuration.

4. TS 3.8.1.2 would be revised to correct a footnote.

TS Bases 3/4.8.1, 3/4.8.2, and 3/4.8.3 would be revised to clarify commitments to Regulatory Guide 1.137 and expand the scope of information contained within the TS Bases.

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

B. BACKGROUND

Diablo Canyon Power Plant (DCPP) Units 1 and 2 have six EDGs to provide emergency A.C. power in the event of a loss of offsite power event. Three EDGs are dedicated to each unit. The function of the EDGs is to provide sufficient A.C. power for the operation of emergency systems and engineered safety features during and following the shutdown of the reactor in the event that offsite power sources are not available.

TS 3.8.1.1.b.1 and TS 3.8.1.2.b.1 require that a volume of fuel oil be maintained in the individual EDG fuel oil day tank to support operation of the EDGs. The fuel oil maintained in each day tank is used for the start and the initial operation of its associated EDG. Additional fuel oil is transferred from the storage tanks via the diesel fuel oil storage and transfer system to replenish the day tanks as required. The diesel fuel oil storage system at DCPP consists of two common tanks with a nominal capacity of 40,000 gallons each and six EDG fuel oil day tanks with a nominal capacity of 550 gallons each.

TS LCOs 3.8.1.1.b.1. and 3.8.1.2.b.1. currently require a minimum inventory of 200 gallons of fuel oil to be maintained in each EDG day tank. Consistent with most other applications in the DCPP TS and Westinghouse

Standard TS (NUREG-1431), this minimum inventory is interpreted to be a contained volume.

Each EDG day tank contains a low level alarm. The low level alarm is set (including instrument inaccuracy and measurement uncertainty) above the current TS required minimum contained volume. The absence of a low level alarm annunciation is used to verify the fuel level in the day tank in accordance with Surveillance Requirement 4.8.1.1.2a.1).

Licensing Documentation

TS 3.8.1.1.b.1. and 3.8.1.2.b.1 currently require 200 gallons of fuel oil be maintained in the EDG day tank. The Bases section of the TS does not describe the basis for this value.

PG&E has conducted a review of the EDG day tank fuel oil basis and licensing documentation. A summary of the review follows.

Although no documentation for the basis of the 200 gallon requirement was identified, discussions with personnel involved with the development of the original day tank TS requirements indicated that the TS was based on a contained volume and relates to the original transfer pump start setpoints.

ANSI N195-1976 Section 6.1 indicates the following regarding day tank minimum required volume. Each diesel shall be equipped with day or integral tank or tanks whose capacity is sufficient to maintain at least 60 minutes of operation at the level where oil is automatically added to the day or integral tank or tanks. This capacity shall be based on the fuel consumption at a load of 100 percent of the continuous rating of the diesel plus a minimum margin of 10 percent (the 10 percent margin is applied to the EDG's load; i.e., the capacity of the day tank is based on 110 percent of the continuous rating).

A PG&E letter to the NRC, dated November 25, 1980, states that compliance with ANSI Standard N195 is not mandatory for DCPP. However, PG&E's response also states that DCPP meets the intent of each element of ANSI Standard N195 and the additional requirements of Reg Guide 1.137. This PG&E response was accepted by the NRC in Safety Evaluation Report Supplement 13 for DCPP.

In addition to PG&E's commitment in the TS to maintain 200 gallons of fuel oil in the day tank, PG&E has a separate commitment to provide a low level alarm. There was no documentation identified which demonstrates that the low level alarm was intended to implement the TS surveillance requirement. The basis for the low level alarm is given in the FSAR Update, Section 9.5.4.3, as follows. In the unlikely event of malfunctions in both redundant fuel oil headers, such as a pump failure in one and piping blockage in the other, low level will be alarmed when sufficient fuel oil remains in the base-mounted day tank for 1 hour of operation at full load. One hour is adequate for an operator: (a) to correct a malfunction of one of the two redundant transfer headers, or (b) to line up manually the valves of the two headers into one path that will transfer oil.

Contained Fuel Oil Volume Requirements

The current day tank TS minimum required volume is 200 gallons. With unusable volume accounted for, this amount provides sufficient fuel oil for approximately 50 minutes of EDG operation at full load without makeup fuel. As an improvement to the TS, PG&E has developed an enhanced basis for the EDG day tank minimum contained volume. The new basis will be similar to the basis of the low level alarm discussed above. Specifically, the TS Basis for the minimum EDG fuel oil contained in the day tank is to provide an amount sufficient for EDG operation at full load (2600 kW) for a nominal one-hour period.

The proposed TS minimum contained volume of 250 gallons includes an allowance for unusable fuel oil and additional conservative margin. A design change is scheduled for the Unit 1 sixth refueling outage (scheduled for March 1994) and for the Unit 2 sixth refueling outage (scheduled for September 1994) that raises the day tank low level alarm. The day tank low level alarm will be set (including instrument inaccuracy and measurement uncertainty) above the TS minimum contained volume.

Fuel Oil Quality Requirements

TS 3/4.8.1, 3/4.8.2, and 3/4.8.3 Bases indicate the following. The Surveillance Requirements for demonstrating the operability of the diesel generators are in accordance with the recommendations of Regulatory Guide 1.137 "Fuel Oil Systems for Standby Diesel Generators," Revision 1, October 1979, where applicable.

Regulatory Guide 1.137 Regulatory Position C.2. provides guidance for ensuring diesel fuel oil quality and identifies ASTM Standards on which testing should be based. Regulatory Guide 1.137 also provides guidance for checking and removing water from the day tanks and fuel oil storage tanks, and for the draining and cleaning of the fuel oil storage tanks. TS 4.8.1.1.3 contains the diesel fuel oil quality surveillance requirements.

Original Unit 1 TS (NUREG-1102) Surveillance Requirement 4.8.1.1.3 stated that fuel oil quality testing and sampling is in accordance with ASTM-D270-1975, ASTM-D975-77, and ASTM-D2274-70 Standards, which are referenced in ANSI N195-1976 and Regulatory Guide 1.137, Revision 1. TS 4.8.1.1.3 diesel fuel oil surveillance requirements were changed with the issuance of the Combined DCPP Units 1 and 2 TS (NUREG-1151) to replace ASTM-D2274-70 and ASTM-D270-1975 with ASTM-D2276-78 and ASTM-D4057-81 to reflect ASTM Standards updates. Although this created an inconsistency between the ASTM Standards referenced in TS 4.8.1.1.3 and the TS Bases reference to Regulatory Guide 1.137, the ASTM Standards referenced in TS 4.8.1.1.3 meet the intent of the Regulatory Guide 1.137 and ANSI N195-1976 recommendations for diesel fuel oil quality testing.

C. JUSTIFICATION

The proposed TS and associated Bases changes for the day tank fuel oil storage requirement and fuel oil quality requirements are TS enhancements. The proposed EDG day tank TS minimum of 250 contained gallons ensures adequate fuel oil for a nominal 1 hour of operation at rated load and provides additional conservatism. One hour is adequate time for an operator to take corrective action to restore the fuel oil supply to the affected day tank. Verification of meeting the proposed EDG day tank TS minimum of 250 contained gallons will be provided by the EDG day tank low level alarm.

Westinghouse Standard TS Bases states that the day tank TS minimum contained volume is based on providing adequate fuel oil for a minimum of 1 hour of EDG operation at full load plus 10 percent. Due to plant configuration, the proposed EDG day tank TS minimum contained volume of 250 gallons does not provide a 10 percent margin. However, the proposed TS does meet the intent of the Westinghouse Standard TS of providing an hour of EDG operation at full load, plus some additional margin.

The additional information in the TS Bases clarifies PG&E's commitments with regard to fuel oil quality requirements, and expands the scope of the information contained within the TS Bases, consistent with the intent of NUREG-1431.

Since installation of the sixth EDG was performed during the Unit 2 fifth refueling outage, TS references to a five diesel generator configuration and a common (swing) diesel are outdated and should be removed. The administrative removal of TS references to a five diesel generator configuration reflects the current plant configuration at DCPP.

Due to an administrative oversight, PG&E incorrectly cited TS 3.8.1.1.a in a footnote added to TS 3.8.1.2 as part of License Amendment 74 and 73. The footnote was intended to reference TS 3.8.1.2.a. The correction of this footnote is administrative in nature.

D. SAFETY EVALUATION

The proposed TS change to 250 gallons contained in each day tank has no effect on the function of the EDGs to start, load, and power essential equipment in the event of a loss of offsite power. The function of the EDGs to provide emergency power to essential equipment is not impaired by these proposed changes.

The transfer pumps automatically start above the TS required volume. Therefore, normal EDG operation will not result in day tank levels below the TS minimum. Additional assurance of a sufficient day tank contained volume is provided by the low level alarm.

Increasing the EDG day tank TS minimum contained volume provides additional conservatism to assure the EDG fuel oil contained in the day tank is sufficient to provide adequate time for an operator to take corrective action to restore the fuel oil supply to the affected day tank in the unlikely event of a failure of the fuel oil transfer system.

Deleting TS references to a five diesel generator configuration and correcting the TS 3.8.1.2 footnote are administrative changes. The TS 3.8.1.2 footnote was intended to reference TS 3.8.1.2; the text of the footnote discusses requirements and unit mode applicability consistent with LCO 3.8.1.2. Since the proposed changes have no effect on any plant systems or the safe operation of DCPP, the changes are not considered to have any safety significance. The administrative changes do, however, clarify the TS by removing extraneous information.

The additional information in the TS Bases clarifies PG&E's commitments and expands the scope of the information contained within the TS Bases. This administrative change has no effect on any plant system or the safe operation of DCPP and are not considered to have any safety significance.

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 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 increase in day tank TS minimum contained volume requirements provides additional conservatism to assure the EDG fuel oil contained in the day tank is sufficient to provide adequate time for an operator to take corrective action to restore the fuel oil supply to the affected day tank in the unlikely event that the fuel oil supply from the main tanks were cut off.

Deletion of TS references to a five diesel generator configuration and correction of the TS 3.8.1.2 footnote are administrative changes that do not change the operating methodology of DCPP. These proposed administrative changes remove outdated information and correct an administrative oversight.

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 increase in day tank TS minimum contained volume requirements would not involve any physical change to the plant systems or, in particular, to the EDG day tanks. The change does not affect the ability of the EDGs to start and to fulfill their safety-related function. Hence, no new failure mechanisms will be introduced.

The proposed removal of references to a five diesel generator configuration and correction of the TS 3.8.1.2 footnote are administrative in nature. Further, the proposed changes would not result in any physical alteration to any plant system.

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?

Increasing the day tank TS minimum contained volume requirements is a conservative change that provides additional margin to assure the EDG fuel oil contained in the day tank is sufficient to provide adequate time for an operator to take corrective action to restore the fuel oil supply to the affected day tank in the unlikely event that the fuel oil supply from the main tanks were cut off. The proposed change will not alter any accident analysis assumptions, initial conditions, or results. Consequently, the proposed change to increase the EDG day tank TS contained fuel oil requirement does not have any effect on a margin of safety.

The proposed administrative changes clarify the TS by removing references to a five diesel generator configuration and correcting the TS 3.8.1.2 footnote.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

F. 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.

G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined 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 effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet 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 changes is not required.