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**Pacific Gas and
Electric Company**

Lawrence F. Womack
Vice President
Nuclear Technical Services

Diablo Canyon Power Plant
P.O. Box 56
Avila Beach, CA 93424
805.545.6000

October 16, 1998

PG&E Letter DCL-98-144

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
License Amendment Request 97-09, "Technical Specification Conversion,"
Response to Request for Additional Information for Section 3.7

- Reference 1) NRC letter from Steven D. Bloom to Gregory M. Rueger,
dated August 14, 1998
- 2) DCL-97-106, "License Amendment Request 97-09, Technical
Specification Conversion License Amendment Request,"
dated June 2, 1997
- 3) DCL-98-003, "License Amendment Request 97-09, Errata," dated
January 9, 1998

Dear Commissioners and Staff:

PG&E submitted a license amendment request (Reference 2) 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 2 as noted in Reference 3. The NRC staff requested additional information regarding Section 3.7, "Plant Systems," of the proposed TS changes in Reference 1. The requested information is provided in the Enclosures to this letter as are any additional changes needed for Section 3.7 as identified by PG&E.

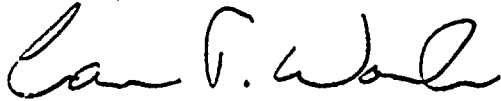
This letter and the Enclosures are not a supplement to Reference 2, and thus have not been reviewed and approved by DCPP's Plant Staff Review Committee. A supplement to Reference 2 will be provided at a later date. Any deviations from the responses provided in this letter will be discussed in the supplement.

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PDR ADCK 05000275
PDR

Document Control Desk
October 16, 1998
Page 2

PG&E Letter-DCL-98-144

Sincerely,

A handwritten signature in black ink, appearing to read "Law F. Womack". The signature is fluid and cursive, with the first name "Law" and last name "Womack" clearly distinguishable.

Lawrence F. Womack

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

Enclosures
MRZ/



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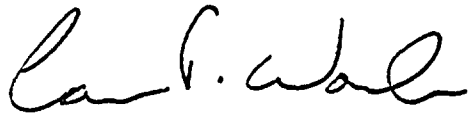
19

UNITED STATES OF AMERICA
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

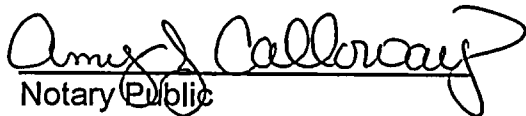
AFFIDAVIT

Lawrence F. Womack, of lawful age, first being duly sworn upon oath says that he is Vice President - Nuclear Technical Services of Pacific Gas and Electric Company; that he has executed the "Response to NRC Request For Additional Information," regarding License Amendment Request 97-09, "Technical Specification Conversion," 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.

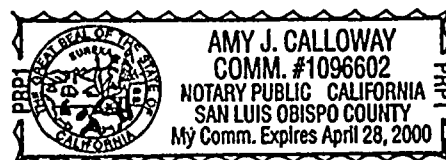


Lawrence F. Womack
Vice President
Nuclear Technical Services

Subscribed and sworn to before me this 16th day of October 1998.
County of San Luis Obispo
State of California



Notary Public





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ACRONYM LIST

ADV	Atmospheric Dump Valve	RCS	Reactor Coolant System
CFCU	Containment Fan Cooling Unit	RG	Regulatory Guide
CIV	Containment isolation Valve	RHR	Residual Heat Removal
CPSES	Comanche Peak Steam Electric Station	SER	Safety Evaluation Report
CTS	Current Tech Spec	SR	Surveillance Requirement
DBA	Design Basis Accident	STS	Standard Tech Spec
DLAP	Department Level Administrative Procedure	TRM	Technical Requirements Manual
DOC	Description of Change	TSTF	Tech Spec Task Force
ECCS	Emergency Core Cooling System	USAR	Updated Safety Analysis Report
ECG	Equipment Control Guideline	WCGS	Wolf Creek Generating Station
EQ	Environment Qualification	WOG	Westinghouse Owners Group
FLOG	Four Loop Owner's Group		
FSAR	Final Safety Analysis Report		
GDC	Generic Design Criteria		
IEEE	Institute of Electrical and Electronic Engineers		
IST	In-service Test		
ITS	Improved Tech Spec		
JFD	Justification For Differences		
LA	License Amendment		
LAR	License Amendment Request		
LCO	Limiting Condition of Operation		
LER	Licensee Event Report		
LG	Less Restrictive		
LOCA	Loss of Coolant Access		
MFIV	Main Feedwater Isolation Valve		
MFRV	Main Feedwater Regulating Valves		
MSSV	Main Steam Safety Valve		
PAMS	Post Accident Monitoring System		
RA	Required Actions		
RAI	Request for additional information		

JLS CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS

**CTS 3/4.7 - PLANT SYSTEMS
ITS 3.7 - PLANT SYSTEMS**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND LICENSEE INITIATED
ADDITIONAL CHANGES**

...9810230152



INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.G-1	DC, CP, WC, CA	YES
3.7.1.-1	DC, CP, WC, CA	YES
3.7.1.-2	CP	NA
3.7.1.-3	DC	YES
3.7.1.-4	DC, CP, WC, CA	YES
3.7.1.-5	DC, CP, WC, CA	YES
3.7.1.-6	WC	NA
3.7.1.-7	DC, CP, WC, CA	YES
3.7.1.-8	WC, CA	NA
3.7.1.-9	DC	YES
3.7.1.-10	DC	YES
3.7.2.-1	CP, WC, CA	NA
3.7.2.-2	WC, CA	NA
3.7.2.-3	DC, CP, WC, CA	YES
3.7.2.-4	CP	NA
3.7.3.-1	DC	YES
3.7.3.-2	CP	NA
3.7.3.-3	DC, CP, WC, CA	YES
3.7.3.-4	WC, CA	NA
3.7.3.-5	DC	YES
3.7.3.-6	CP	NA
3.7.4.-1	DC, CP	YES
3.7.4.-2	DC	YES
3.7.4.-3	DC	YES
3.7.4.-4	WC, CA	NA
3.7.4.-5	CP, WC, CA	NA
3.7.4.-6	CP, CA	NA
3.7.4.-7	CP, WC, CA	NA
3.7.4.-8	CP	NA
3.7.4.-9	CP	NA
3.7.5.-1	CP	NA
3.7.5.-2	WC, CA	NA
3.7.5.-3	CA	NA
3.7.5.-4	WC, CA	NA
3.7.5.-5	CP	NA
3.7.5.-6	CP, WC, CA	NA
3.7.5.-7	CP, WC, CA	NA
3.7.5.-8	DC, CP	YES
3.7.5.-9	DC, CP, WC, CA	YES
3.7.5.-10	DC, CP	YES
3.7.5.-11	DC	YES
3.7.5.-12	DC	YES
3.7.6.-1	WC	NA
3.7.6.-2	CP, WC, CA	NA



INDEX OF ADDITIONAL INFORMATION
(cont)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.6.-3	CP	NA
3.7.6.-4	WC, CA	NA
3.7.6.-5	CP	NA
3.7.6.-6	CA	NA
3.7.6.-7	DC	YES
3.7.7.-1	WC, CA	NA
3.7.7.-2	DC, CP, WC, CA	YES
3.7.7.-3	WC, CA	NA
3.7.7.-4	DC, CP	YES
3.7.7.-5	DC	YES
3.7.7.-6	DC	YES
3.7.8.-1	CP	NA
3.7.8.-2	CP	NA
3.7.8.-3	CP	NA
3.7.8.-4	CP	NA
3.7.8.-5	CP	NA
3.7.8.-6	DC	YES
3.7.8.-7	DC	YES
3.7.8.-8	DC	YES
3.7.8.-9	DC	YES
3.7.8.-10	DC	YES
3.7.8.-11	WC, CA	NA
3.7.8.-12	WC, CA	NA
3.7.8.-13	WC	NA
3.7.8.-14	WC, CA	NA
3.7.8.-15	WC, CA	NA
3.7.8.-16	CA	NA
3.7.8.-17	CA	NA
3.7.9.-1	DC	YES
3.7.9.-2	DC	YES
3.7.9.-3	CP	NA
3.7.9.-4	CP	NA
3.7.9.-5	WC	NA
3.7.9.-6	CA	NA
3.7.9.-7	CA	NA
3.7.9.-8	CA	NA
3.7.10.-1	DC	YES
3.7.10.-2	DC	YES
3.7.10.-3	DC	YES
3.7.10.-4	DC, WC, CA	YES
3.7.10.-5	DC	YES
3.7.10.-6	DC	YES
3.7.10.-7	DC, WC, CA	YES


INDEX OF ADDITIONAL INFORMATION
(cont)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.10.-8	DC, WC, CA	YES
3.7.10.-9	DC, CP, WC, CA	YES
3.7.10.-10	DC	YES
3.7.10.-11	CP	NA
3.7.10.-12	DC	YES
3.7.10.-13	CA	NA
3.7.10.-14	CP, WC, CA	NA
3.7.10.-15	WC, CA	NA
3.7.10.-16	WC, CA	NA
3.7.10.-17	WC, CA	NA
3.7.10.-18	DC, WC, CA	YES
3.7.10.-19	CP, WC, CA	NA
3.7.11.-1	CP	NA
3.7.12.2.-1	DC	YES
3.7.12.2.-2	DC	YES
3.7.12.2.-3	DC	YES
3.7.12.2.-4	DC	YES
3.7.12.2.-5	DC	YES
3.7.12.2.-6	DC	YES
3.7.13.1.-1	DC	YES
3.7.13.1.-2	DC	YES
3.7.13.1.-3	DC	YES
3.7.13.1.-4	DC	YES
3.7.13.1.-5	DC	YES
3.7.13.1.-6	DC	YES
3.7.13.1.-7	DC	YES
3.7.13.1.-8	DC	YES
3.7.13.2.-1	WC, CA	NA
3.7.13.2.-2	WC, CA	NA
3.7.13.2.-3	WC, CA	NA
3.7.13.2.-4	WC, CA	NA
3.7.13.2.-5	CA	NA
3.7.13.2.-7	WC, CA	NA
3.7.13.2.-8	WC, CA	NA
3.7.13.2.-9	WC, CA	NA
3.7.13.2.-10	WC, CA	NA
3.7.15.-1	DC, CP, WC, CA	YES
3.7.15.-2	WC, CA	NA
3.7.15.-3	CP	NA
3.7.16.-1	DC	YES
3.7.16.-2	DC	YES
3.7.16.-3	CP, WC, CA	NA
3.7.17.1.-1	WC, CA	NA
3.7.17.1.-2	CP, WC, CA	NA



INDEX OF ADDITIONAL INFORMATION
(cont)


<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.17.1.-3	WC, CA	NA
3.7.17.1.-4	WC, CA	NA
3.7.17.1.-5	WC, CA	NA
3.7.17.1.-6	WC, CA	NA
3.7.17.1.-7	CP	NA
3.7.17.2.-1	DC	YES
3.7.17.2.-2	DC	YES
3.7.17.2.-3	DC	YES
3.7.17.2.-4	DC	YES
3.7.17.2.-5	DC	YES
3.7.17.3.-1	DC	YES
3.7.17.3.-2	DC	YES
3.7.17.3.-3	DC	YES
3.7.17.3.-4	DC	YES
3.7.17.3.-5	DC	YES
3.7.17.3.-6	DC	YES
3.7.18.-1	CP	NA
3.7.19.-1	CP	NA
3.7.19.-2	CP	NA
3.7.19.-3	CP	NA
3.7.19.-4	CP	NA
3.7.19.-5	CP	NA
3.7.20.-1	CP	NA
3.7.20.-2	CP	NA
3.7.20.-3	CP	NA
3.7.20.-4	CP	NA
3.7.20.-5	CP	NA
3.7.20.-6	CP	NA
3.7 R DOCs	CP, DC, WC, CA	YES
TR 3.7-001	DC, CP, WC, CA	YES
TR 3.7-002	DC, CP, WC, CA	YES
TR 3.7-005	DC, CP, WC, CA	YES
CA 3.7-ED	CA	NA
CA 3.7-003	CA	NA
CA 3.7-004	CA	NA
CA 3.7-005	CA	NA
CA 3.7-008	CA	NA
CA 3.7-009	CA	NA









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INDEX OF ADDITIONAL INFORMATION
(cont)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
WC 3.7-001	WC	NA
WC 3.7-002	WC	NA
WC 3.7-003	WC	NA
WC 3.7-004	WC	NA
WC 3.7-005	WC	NA
WC 3.7-006	WC	NA
WC 3.7-007	WC	NA
CP 3.7-ED	CP	NA
CP 3.7-004	CP	NA
CP 3.7-005	CP	NA
CP 3.7-008	CP, WC	NA
CP 3.7-009	CP, WC	NA
CP 3.7-012	CP	NA
CP 3.7-013	CP	NA
CP 3.7-014	CP	NA
CP 3.7-015	CP	NA
DC 3.7-ED	DC	YES
DC-ALL-001 (3.7 changes only)	DC	see DCL-98-003
DC-ALL-002 (3.7 changes only)	DC	see DCL-98-003
DC-ALL-003 (3.7 changes only)	DC	YES
DC 3.7-008	DC	YES
DC 3.7-009	DC	YES
DC 3.7-010	DC	YES

JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR PROVIDING ADDITIONAL INFORMATION

The following methodology is followed for submitting additional information:

1. Each licensee is submitting a separate response for each section.
2. If an RAI does not apply to a licensee (i.e., does not actually impact the information that defines the technical specification change for that licensee), "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
3. If a licensee initiated change does not apply, "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
4. The common portions of the "Additional Information Cover Sheets" are identical, except for brackets, where applicable (using the same methodology used in enclosures 3A, 3B, 4, 6A and 6B of the conversion submittals). The list of attached pages will vary to match the licensee specific conversion submittals. A licensee's FLOG response may not address all applicable plants if there is insufficient similarity in the plant specific responses to justify their inclusion in each submittal. In those cases, the response will be prefaced with a heading such as "PLANT SPECIFIC DISCUSSION."
5. Changes are indicated using the redline/strikeout tool of WordPerfect or by using a hand markup that indicates insertions and deletions. If the area being revised is not clear, the affected portion of the page is circled. The markup techniques vary as necessary, based on the specifics of the area being changed and the complexity of the changes, to provide the clearest possible indication of the changes.
6. A marginal note (the Additional Information Number from the index) is added in the right margin of each page being changed, adjacent to the area being changed, to identify the source of each change.
7. Some changes are not applicable to one licensee but still require changes to the Tables provided in Enclosures 3A, 3B, 4, 6A, and 6B of the original license amendment request to reflect the changes being made by one or more of the other licensees. These changes are not included in the additional information for the licensee to which the change does not apply, as the changes are only for consistency, do not technically affect the request for that licensee, and are being provided in the additional information being provided by the licensees for which the change is applicable. The complete set of changes for the license amendment request will be provided in a licensing amendment request supplement to be provided later.



**JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR
PROVIDING ADDITIONAL INFORMATION**
(continued)

8. The item numbers are formatted as follows:

[Source] [ITS Section]-[nnn]

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

ITS Section = The ITS section associated with the item (e.g., 3.3). If all sections are potentially impacted by a broad change or set of changes, "ALL" is used for the section number.

nnn = a three digit sequential number



ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 3.7.G-1

APPLICABILITY: DC, CP, WC, CA

REQUEST:

ITS 3.7.X Bases

General

There have been a number of instances that the specific changes to the STS Bases are not properly identified with redline or strikeout marks.

Comment: Perform an audit of all STS Bases markups and identify instances where additions and/or deletions of Bases were not properly identified in the original submittal.

FLOG RESPONSE: The submitted ITS Bases markups for Section 3.7 have been compared to the STS Bases. Some differences that were identified were in accordance with the markup methodologies (e.g., deletion of brackets and reviewer's notes). Most of the differences were editorial in nature and would not have affected the review. Examples of editorial changes are:

- 1) Capitalizing a letter with only a "redline" but not striking out the lower case letter that it replaced.
- 2) Changing a verb from singular to plural by adding an "s" without "redlining" the "s".
- 3) Deleting instead of striking-out the A, B, C,.. etc. following a specification title (e.g., SR3.6.6A.7).
- 4) Changing a bracketed reference (in the reference section) with only a "redline" for the new reference but failing to include the strike-out of the old reference.
- 5) In some instances the brackets were retained (and struck-out) but the unchanged text within the brackets was not redlined.
- 6) Not redlining a title of a bracketed section. The methodology calls for the section title to be redlined when an entire section was bracketed.
- 7) Additional text not contained in the STS Bases was added to the ITS Bases by the lead FLOG member during the development of the submittal. Once it was determined to not be applicable, the text was then struck-out and remains in the ITS Bases mark-up.

Differences of the above editorial nature will not be provided as attachments to this response. The pages requiring changes that are more than editorial and are not consistent with the markup methodology are attached.

ATTACHED PAGES:

Encl. 5B B3.7-2, B3.7-9, B3.7-14, B3.7-20, B3.7-26, B3.7-35, B3.7-39, B3.7-40, B3.7-44,
B3.7-49, B3.7-50, B3.7-54, B3.7-64, B3.7-65, B3.7-70, B3.7-77, B3.7-82,
B3.7-85, B3.7-89, B3.7-93

