PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9512270147 DOC.DATE: 95/12/19 NOTARIZED: YES 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
RUEGER,G.M. Pacific Gas & Electric Co. See Proposed Change To Tech Specs.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-80 & DPR-82, relocating TS 6.5, "Review & Audit," & TS 6.8, "Procedures & Program," Section 6.8.1c,6.8.1d.6.8.2 & 6.8.3.

DISTRIBUTION CODE: Q004D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 9+87
TITLE: QA Topical Report, Change, Amendment, or Correspondence (Docket/Utili

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	BLOOM,S	1	1			
INTERNAL:	ACRS	8	8	DRS/RGN1	1	1
	DRS/RGN2	1	1	DRS/RGN3	1	1
	DRS/RGN4	1	1	FILE CENTER 01	2	2
	NRR/DISP/IMS	1	1	NRR/DRCH/HQMB	1	1
	NUDOCS-ABSTRACT	1	1	OC/LFDCB	1	1
	RGN4 FILE	1	1			
EXTERNAL:	DMB/OSS	1	1	IHS	1	1
	NRC PDR	1	1			

F F I C I L I T Y 1 D O C U M E N T

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 23 ENCL 23

AA2

Pacific Gas and Electric Company

77 Beale Street, Room 1451-B14A
San Francisco, CA 94105
Mailing Address
Mail Code B14A
P.O. Box 770000
San Francisco, CA 94177
415/973-4684
Fax 415/973-2313

Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

December 19, 1995

PG&E Letter DCL-95-276

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 95-08
Revision of Technical Specifications 6.1, "Responsibility," 6.5, "Review and Audit," and 6.8, "Procedures and Programs" - Revise in Accordance with NRC Guidance and Proposed Revision to the Quality Assurance Program

Gentlemen:

Enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 and a proposed revision to the Quality Assurance (QA) Program described in Chapter 17 of the Final Safety Analysis Report (FSAR) Update. The enclosed License Amendment Request (LAR) proposes to relocate Technical Specification (TS) 6.5, "Review and Audit," and TS 6.8, "Procedures and Programs," Sections 6.8.1c., 6.8.1d., 6.8.2, and 6.8.3. The proposed relocation is in accordance with guidance in an NRC letter from William T. Russell to the chairpersons of the industry owners groups, dated October 25, 1993, and the Commission's Final Policy Statement for relocation of TS that do not meet any of the screening criteria for retention. As part of the relocation of TS 6.8.2, TS 6.1.1 would be revised to require that proposed tests, experiments, or modifications that affect nuclear safety be approved by the plant manager or his designee prior to implementation.

The proposed changes to the QA Program are described in Attachments D, E, F, and G. The proposed changes do not reduce the effectiveness of the QA Program.

The changes proposed in this LAR are not required to address any immediate safety concern. PG&E requests that the NRC assign a medium priority for review and approval of this LAR. Due to the large number of procedures

affected by this change, PG&E requests that the TS changes become effective 90 days from issuance of the license amendment.

Sincerely,

Gregory M. Rueger

cc: Edgar Bailey, DHS
Steven K. Bloom
L. J. Callan
Jennifer Dixon-Herrity
Kenneth E. Perkins
Michael D. Tschiltz
Diablo Distribution

Enclosure

1270S/PTN/2011

Enclosure
PG&E Letter DCL-95-276

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

License Amendment Request No. 95-08

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 (TS) (Appendix A of the Licenses) regarding TS 6.5, "Review and Audit," and TS 6.8, "Procedures and Programs," Sections 6.8.1c., 6.8.1d., 6.8.2, and 6.8.3. Information on the proposed changes is included in Attachments A, B, C, D, E, F and G.

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 assessment in accordance with 10 CFR 51.22(b). Further, there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed changes.

Sincerely,

Gregory M. Rueger

Subscribed and sworn to before me
this 19th day of December 1995

Notary Public

Attorneys for Pacific Gas
and Electric Company
Bruce R. Worthington
Christopher J. Warner

Christopher J. Warner

D. GENA JEE
Commission #1067005
Notary Public — California
SAN FRANCISCO COUNTY
My Comm. Expires JUL 30, 1999

REVISION OF TECHNICAL SPECIFICATIONS 6.1, "RESPONSIBILITY," 6.5, "REVIEW AND AUDIT," AND 6.8, "PROCEDURES AND PROGRAMS" - REVISE IN ACCORDANCE WITH NRC GUIDANCE

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to relocate Technical Specifications (TS) 6.5, "Review and Audit," 6.8, "Procedures and Programs," Sections 6.8.1c., 6.8.1d., 6.8.2, and 6.8.3, in accordance with guidance in an NRC letter dated October 25, 1993, from William T. Russell to the chairpersons of industry owners groups and the Commission's Final Policy Statement on TS Improvements for Nuclear Power Reactors on relocation of TS that do not satisfy the retention criteria.

As part of the relocation of TS 6.8.2, TS 6.1.1 would be revised to require that proposed tests, experiments, or modifications that affect nuclear safety be approved by the plant manager or his designee prior to implementation.

Changes to the TS are noted in the marked-up copy of the applicable TS in Attachment B. The proposed TS are included in Attachment C.

B. BACKGROUND

The Commission's Final Policy Statement on TS Improvements for Nuclear Power Reactors was published on July 22, 1993 (58 FR 39132). The Final Policy Statement includes four criteria to be used for identifying TS requirements that can be relocated to licensee-controlled documents. The criteria include three deterministic and one probabilistic criteria for evaluating TS proposed for relocation. Although the Final Policy Statement does not prohibit the four criteria from being applied to the administrative controls section of the TS, they were intended to address equipment required by TS limiting conditions for operation.

On October 25, 1993, the NRC issued a letter from William T. Russell to the chairpersons of the industry owners groups that identified changes to the administrative controls section of TS. The letter not only identified proposed changes to the administrative controls section of the TS, but also included two criteria the NRC used to evaluate administrative controls for relocation to licensee-controlled documents. The criteria include: (1) requirements not covered by other regulatory requirements but necessary to assure the safe

operation of a facility, and (2) specific requirements that are broadly covered by regulations or other regulatory requirements for which detail need to be specified in the TS to assure safe plant operation. Those TS that did not satisfy the criteria were identified for relocation to licensee-controlled documents. Therefore, any administrative requirement addressed by other regulations in sufficient detail to assure safe operation of the facility or requirements not necessary for safe operation of the facility can be relocated.

C. JUSTIFICATION

The Commission's Final Policy Statement states that TS that do not meet any of the screening criteria for retention may be proposed for removal from the TS and relocated to licensee-controlled documents, such as the Final Safety Analysis Report (FSAR) Update. The screening criteria are primarily concerned with system and component operation. Consequently, administrative requirements satisfy the screening criteria for relocation. However, as identified above, the NRC identified two criteria for screening administrative controls for relocation. Application of the criteria and specific justifications for the proposed relocations are discussed below:

TS 6.5

The TS review and audit requirements are not necessary to assure safe operation of the facility. Review and audit requirements are specified in the Quality Assurance (QA) Program, as required by 10 CFR 50.54 and 10 CFR Part 50, Appendix B. These regulations control the requirements for all review and audit functions, except those associated with the security and emergency plans.

1. The review functions performed by the Plant Staff Review Committee (PSRC) and the maintenance of records of reviews are required by American National Standards Institute (ANSI) N18.7-1976, as modified by Regulatory Guide (RG) 1.33, 1978. Since the PSRC requirements will be relocated to Chapter 17 of the FSAR Update, which defines QA Program requirements, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

2. The independent review function performed by the Nuclear Safety Oversight Committee (NSOC) implements independent review requirements of ANSI N18.7-1976 for a standing review committee. Since the NSOC requirements will be relocated to Chapter 17 of the FSAR Update, which defines QA Program requirements, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

3. The Independent Technical Review Program implements independent review requirements of ANSI N18.7-1976 that are not implemented by NSOC. Since requirements of this program will be relocated to Chapter 17 of the FSAR Update, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59. Chapter 17 of the FSAR Update defines QA Program requirements. The revisions to Chapter 17 will include minimum qualification requirements of review personnel.

4. Audit requirements are specified in the QA Program to satisfy 10 CFR 50, Appendix B, Criterion XVIII. Audit requirements are also addressed in ANSI N18.7, ANSI N45.2, 10 CFR 50.54(t), 10 CFR 50.54(p), and 10 CFR 73. Therefore, the audit requirements in TS 6.5 duplicate requirements contained in regulations and can be relocated. Since the audit requirements will be relocated to Chapter 17 of the FSAR Update, which defines QA Program requirements, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

5. The requirements for record retention in TS 6.5 are addressed in 10 CFR 50, Appendix B, Criterion XVII, and in Chapter 17 of the FSAR Update. Since the requirements are specified in regulations and the QA Program, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

   Facility operations are performed in accordance with approved written procedures. These and other records regarding plant operation are retained to allow for review of compliance with procedure requirements and regulations. However, post-compliance reviews of records do not affect safe plant operation since activities described in these documents have already been performed. Additionally, other regulations, including 10 CFR 20 and 10 CFR 50.71, require the retention of records related to plant operation. Existing regulatory requirements provide sufficient control of record retention requirements.

The relocation of TS 6.5 is consistent with the guidance provided in an NRC letter dated October 25, 1993.

<u>TS 6.8.1c. and 6.8.1d.</u>

The security and emergency plan review and audit functions are relocated to their respective plans in accordance with Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans." The relocation of these requirements to the Security and Emergency Plans results in an equivalent level of regulatory authority since any

change to the Security or Emergency Plan that results in a decrease in effectiveness of the plan must be reviewed by the NRC prior to implementation. The effect of the change is that the level of safety of plant operation is unaffected, and NRC and facility resources associated with processing license amendments to this administrative control are optimized. Security Plan requirements are addressed in 10 CFR 73. Emergency Plan requirements are addressed in 10 CFR 50.47 and 10 CFR 50, Appendix E.

TS 6.8.2 and 6.8.3

TS 6.8.2 and 6.8.3 address procedure review and control requirements. Procedure review requirements are also specified in 10 CFR 50.36 and 10 CFR 50, Appendix B, as well as the QA Program.

These proposed changes are consistent with the guidance provided in NRC letter dated October 25, 1993.

TS 6.1.1

The change to this TS is an administrative change that incorporates information located in TS 6.8.2 to be consistent with NUREG-1431, Revision 1. dated April 7, 1995.

D. SAFETY EVALUATION

The NRC letter dated October 25, 1993, includes two criteria for relocating administrative controls from the TS to licensee-controlled documents. Those administrative controls that are encompassed by other regulations in sufficient detail to allow implementation of the regulation may be relocated from the plant TS. Similarly, the Commission's Final Policy Statement recommends that TS that do not meet the screening criteria for retention as a TS may be relocated to a licensee-controlled document. The administrative controls TS that are proposed to be relocated are addressed by other regulations and do not constitute performance requirements necessary to ensure safe operation of the facility. Therefore, they do not warrant being in the TS.

The relocation of the specified TS is administrative in nature. Any changes to the relocated information that could potentially impact the effectiveness of the QA Program are evaluated in Attachments D, E, F, and G to this submittal.

The change to TS 6.1.1 is administrative in nature since the change adds requirements to TS 6.1.1 previously included in TS 6.8.2. The other requirements of TS 6.8.2 will be included in Chapter 17 of the FSAR Update, as indicated in Attachments F and G of this submittal.

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 hazards 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 a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or a testing facility involves no significant hazards considerations, 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 no significant hazards consideration standards.

1. *Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?*

   The proposed changes simplify the Technical Specifications (TS), meet regulatory requirements for relocated TS, and implement the recommendations of the NRC's letter dated October 25, 1993, from William T. Russell to the chairpersons of: (1) the industry owners groups; (2) the Commission's Final Policy Statement on TS Improvements; and (3) the recently revised 10 CFR 50.36. Future changes to these requirements will be controlled by 10 CFR 50.54 and 10 CFR 50.59. Any changes that reduce the effectiveness of the Quality Assurance Program will be approved by the NRC prior to implementation. The proposed changes are administrative in nature and do not involve any modifications to any plant equipment or affect plant operation.

   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 changes are administrative in nature, do not involve any physical alterations to any plant equipment, and cause no change in the method by which any safety-related system performs its function.

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?*

The proposed changes do not alter the basic regulatory requirements and do not affect any safety analyses. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PG&E concludes that the changes proposed by this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c); accordingly, a no significant hazards 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.

PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9512270147 DOC.DATE: 95/12/19 NOTARIZED: YES 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
RUEGER,G.M. Pacific Gas & Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

See Proposed Change To Tech Specs.

SUBJECT: Application for amends to licenses DPR-80 & DPR-82, relocating TS 6.5, "Review & Audit," & TS 6.8, "Procedures & Program," Section 6.8.1c,6.8.1d.6.8.2 & 6.8.3.

DISTRIBUTION CODE: Q004D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 9+87
TITLE: QA Topical Report, Change, Amendment, or Correspondence (Docket/Utili

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	BLOOM,S	1	1			
INTERNAL:	ACRS	8	8	DRS/RGN1	1	1
	DRS/RGN2	1	1	DRS/RGN3	1	1
	DRS/RGN4	1	1	FILE CENTER 01	2	2
	NRR/DISP/IMS	1	1	NRR/DRCH/HQMB	1	1
	NUDOCS-ABSTRACT	1	1	OC/LFDCB	1	1
	RGN4 FILE	1	1			
EXTERNAL:	DMB/OSS	1	1	IHS	1	1
	NRC PDR	1	1			

P R I O R I T Y 1 D O C U M E N T

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 23 ENCL 23

AA2

Pacific Gas and Electric Company

77 Beale Street, Room 1451-B14A
San Francisco, CA 94105
Mailing Address
Mail Code B14A
P.O. Box 770000
San Francisco, CA 94177
415/973-4684
Fax 415/973-2313

Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

December 19, 1995

PG&E Letter DCL-95-276

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 95-08
Revision of Technical Specifications 6.1, "Responsibility," 6.5, "Review and Audit," and 6.8, "Procedures and Programs" - Revise in Accordance with NRC Guidance and Proposed Revision to the Quality Assurance Program

Gentlemen:

Enclosed is an application for amendment to Facility Operating License Nos. DPR-80 and DPR-82 and a proposed revision to the Quality Assurance (QA) Program described in Chapter 17 of the Final Safety Analysis Report (FSAR) Update. The enclosed License Amendment Request (LAR) proposes to relocate Technical Specification (TS) 6.5, "Review and Audit," and TS 6.8, "Procedures and Programs," Sections 6.8.1c., 6.8.1d., 6.8.2, and 6.8.3. The proposed relocation is in accordance with guidance in an NRC letter from William T. Russell to the chairpersons of the industry owners groups, dated October 25, 1993, and the Commission's Final Policy Statement for relocation of TS that do not meet any of the screening criteria for retention. As part of the relocation of TS 6.8.2, TS 6.1.1 would be revised to require that proposed tests, experiments, or modifications that affect nuclear safety be approved by the plant manager or his designee prior to implementation.

The proposed changes to the QA Program are described in Attachments D, E, F, and G. The proposed changes do not reduce the effectiveness of the QA Program.

The changes proposed in this LAR are not required to address any immediate safety concern. PG&E requests that the NRC assign a medium priority for review and approval of this LAR. Due to the large number of procedures

270059

2004.

affected by this change, PG&E requests that the TS changes become effective 90 days from issuance of the license amendment.

Sincerely,

Gregory M. Rueger

cc: Edgar Bailey, DHS
Steven K. Bloom
L. J. Callan
Jennifer Dixon-Herrity
Kenneth E. Perkins
Michael D. Tschiltz
Diablo Distribution

Enclosure

1270S/PTN/2011

Enclosure
PG&E Letter DCL-95-276

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

License Amendment Request No. 95-08

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 (TS) (Appendix A of the Licenses) regarding TS 6.5, "Review and Audit," and TS 6.8, "Procedures and Programs," Sections 6.8.1c., 6.8.1d., 6.8.2, and 6.8.3. Information on the proposed changes is included in Attachments A, B, C, D, E, F and G.

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 assessment in accordance with 10 CFR 51.22(b). Further, there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed changes.

Sincerely,

Gregory M. Rueger

Subscribed and sworn to before me
this 19th day of December 1995

Notary Public

Attorneys for Pacific Gas
and Electric Company
Bruce R. Worthington
Christopher J. Warner

Christopher J. Warner

D. GENA JEE
Commission #1067005
Notary Public — California
SAN FRANCISCO COUNTY
My Comm. Expires JUL 30, 1999

REVISION OF TECHNICAL SPECIFICATIONS 6.1, "RESPONSIBILITY," 6.5, "REVIEW AND AUDIT," AND 6.8, "PROCEDURES AND PROGRAMS" - REVISE IN ACCORDANCE WITH NRC GUIDANCE

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to relocate Technical Specifications (TS) 6.5, "Review and Audit," 6.8, "Procedures and Programs," Sections 6.8.1c., 6.8.1d., 6.8.2, and 6.8.3, in accordance with guidance in an NRC letter dated October 25, 1993, from William T. Russell to the chairpersons of industry owners groups and the Commission's Final Policy Statement on TS Improvements for Nuclear Power Reactors on relocation of TS that do not satisfy the retention criteria.

As part of the relocation of TS 6.8.2, TS 6.1.1 would be revised to require that proposed tests, experiments, or modifications that affect nuclear safety be approved by the plant manager or his designee prior to implementation.

Changes to the TS are noted in the marked-up copy of the applicable TS in Attachment B. The proposed TS are included in Attachment C.

B. BACKGROUND

The Commission's Final Policy Statement on TS Improvements for Nuclear Power Reactors was published on July 22, 1993 (58 FR 39132). The Final Policy Statement includes four criteria to be used for identifying TS requirements that can be relocated to licensee-controlled documents. The criteria include three deterministic and one probabilistic criteria for evaluating TS proposed for relocation. Although the Final Policy Statement does not prohibit the four criteria from being applied to the administrative controls section of the TS, they were intended to address equipment required by TS limiting conditions for operation.

On October 25, 1993, the NRC issued a letter from William T. Russell to the chairpersons of the industry owners groups that identified changes to the administrative controls section of TS. The letter not only identified proposed changes to the administrative controls section of the TS, but also included two criteria the NRC used to evaluate administrative controls for relocation to licensee-controlled documents. The criteria include: (1) requirements not covered by other regulatory requirements but necessary to assure the safe

operation of a facility, and (2) specific requirements that are broadly covered by regulations or other regulatory requirements for which detail need to be specified in the TS to assure safe plant operation. Those TS that did not satisfy the criteria were identified for relocation to licensee-controlled documents. Therefore, any administrative requirement addressed by other regulations in sufficient detail to assure safe operation of the facility or requirements not necessary for safe operation of the facility can be relocated.

C. JUSTIFICATION

The Commission's Final Policy Statement states that TS that do not meet any of the screening criteria for retention may be proposed for removal from the TS and relocated to licensee-controlled documents, such as the Final Safety Analysis Report (FSAR) Update. The screening criteria are primarily concerned with system and component operation. Consequently, administrative requirements satisfy the screening criteria for relocation. However, as identified above, the NRC identified two criteria for screening administrative controls for relocation. Application of the criteria and specific justifications for the proposed relocations are discussed below:

TS 6.5

The TS review and audit requirements are not necessary to assure safe operation of the facility. Review and audit requirements are specified in the Quality Assurance (QA) Program, as required by 10 CFR 50.54 and 10 CFR Part 50, Appendix B. These regulations control the requirements for all review and audit functions, except those associated with the security and emergency plans.

1. The review functions performed by the Plant Staff Review Committee (PSRC) and the maintenance of records of reviews are required by American National Standards Institute (ANSI) N18.7-1976, as modified by Regulatory Guide (RG) 1.33, 1978. Since the PSRC requirements will be relocated to Chapter 17 of the FSAR Update, which defines QA Program requirements, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

2. The independent review function performed by the Nuclear Safety Oversight Committee (NSOC) implements independent review requirements of ANSI N18.7-1976 for a standing review committee. Since the NSOC requirements will be relocated to Chapter 17 of the FSAR Update, which defines QA Program requirements, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

3. The Independent Technical Review Program implements independent review requirements of ANSI N18.7-1976 that are not implemented by NSOC. Since requirements of this program will be relocated to Chapter 17 of the FSAR Update, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59. Chapter 17 of the FSAR Update defines QA Program requirements. The revisions to Chapter 17 will include minimum qualification requirements of review personnel.

4. Audit requirements are specified in the QA Program to satisfy 10 CFR 50, Appendix B, Criterion XVIII. Audit requirements are also addressed in ANSI N18.7, ANSI N45.2, 10 CFR 50.54(t), 10 CFR 50.54(p), and 10 CFR 73. Therefore, the audit requirements in TS 6.5 duplicate requirements contained in regulations and can be relocated. Since the audit requirements will be relocated to Chapter 17 of the FSAR Update, which defines QA Program requirements, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

5. The requirements for record retention in TS 6.5 are addressed in 10 CFR 50, Appendix B, Criterion XVII, and in Chapter 17 of the FSAR Update. Since the requirements are specified in regulations and the QA Program, changes to the requirements will be controlled effectively under 10 CFR 50.54 and 10 CFR 50.59.

   Facility operations are performed in accordance with approved written procedures. These and other records regarding plant operation are retained to allow for review of compliance with procedure requirements and regulations. However, post-compliance reviews of records do not affect safe plant operation since activities described in these documents have already been performed. Additionally, other regulations, including 10 CFR 20 and 10 CFR 50.71, require the retention of records related to plant operation. Existing regulatory requirements provide sufficient control of record retention requirements.

The relocation of TS 6.5 is consistent with the guidance provided in an NRC letter dated October 25, 1993.

<u>TS 6.8.1c. and 6.8.1d.</u>

The security and emergency plan review and audit functions are relocated to their respective plans in accordance with Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans." The relocation of these requirements to the Security and Emergency Plans results in an equivalent level of regulatory authority since any

change to the Security or Emergency Plan that results in a decrease in effectiveness of the plan must be reviewed by the NRC prior to implementation. The effect of the change is that the level of safety of plant operation is unaffected, and NRC and facility resources associated with processing license amendments to this administrative control are optimized. Security Plan requirements are addressed in 10 CFR 73. Emergency Plan requirements are addressed in 10 CFR 50.47 and 10 CFR 50, Appendix E.

TS 6.8.2 and 6.8.3

TS 6.8.2 and 6.8.3 address procedure review and control requirements. Procedure review requirements are also specified in 10 CFR 50.36 and 10 CFR 50, Appendix B, as well as the QA Program.

These proposed changes are consistent with the guidance provided in NRC letter dated October 25, 1993.

TS 6.1.1

The change to this TS is an administrative change that incorporates information located in TS 6.8.2 to be consistent with NUREG-1431, Revision 1. dated April 7, 1995.

D. SAFETY EVALUATION

The NRC letter dated October 25, 1993, includes two criteria for relocating administrative controls from the TS to licensee-controlled documents. Those administrative controls that are encompassed by other regulations in sufficient detail to allow implementation of the regulation may be relocated from the plant TS. Similarly, the Commission's Final Policy Statement recommends that TS that do not meet the screening criteria for retention as a TS may be relocated to a licensee-controlled document. The administrative controls TS that are proposed to be relocated are addressed by other regulations and do not constitute performance requirements necessary to ensure safe operation of the facility. Therefore, they do not warrant being in the TS.

The relocation of the specified TS is administrative in nature. Any changes to the relocated information that could potentially impact the effectiveness of the QA Program are evaluated in Attachments D, E, F, and G to this submittal.

The change to TS 6.1.1 is administrative in nature since the change adds requirements to TS 6.1.1 previously included in TS 6.8.2. The other requirements of TS 6.8.2 will be included in Chapter 17 of the FSAR Update, as indicated in Attachments F and G of this submittal.

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 hazards 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 a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or a testing facility involves no significant hazards considerations, 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 no significant hazards consideration standards.

1. *Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?*

   The proposed changes simplify the Technical Specifications (TS), meet regulatory requirements for relocated TS, and implement the recommendations of the NRC's letter dated October 25, 1993, from William T. Russell to the chairpersons of: (1) the industry owners groups; (2) the Commission's Final Policy Statement on TS Improvements; and (3) the recently revised 10 CFR 50.36. Future changes to these requirements will be controlled by 10 CFR 50.54 and 10 CFR 50.59. Any changes that reduce the effectiveness of the Quality Assurance Program will be approved by the NRC prior to implementation. The proposed changes are administrative in nature and do not involve any modifications to any plant equipment or affect plant operation.

   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 changes are administrative in nature, do not involve any physical alterations to any plant equipment, and cause no change in the method by which any safety-related system performs its function.

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?*

The proposed changes do not alter the basic regulatory requirements and do not affect any safety analyses. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PG&E concludes that the changes proposed by this LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c); accordingly, a no significant hazards 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.