

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. 95-09

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) to incorporate the requirements of 10 CFR 50, Appendix J, Option B for Units 1 and 2, respectively. The proposed changes revise Technical Specification (TS) (Appendix A of the Licenses) 3/4.6.1.1, "Containment Integrity"; 3/4.6.1.2, "Containment Leakage"; 3/4.6.1.3, "Containment Air Locks"; 3/4.6.1.6, "Containment Structural Integrity"; 3/4.6.3, "Containment Isolation Valves"; their associated Bases; and adds 6.8.4 j, "Containment Leakage Rate Testing Program."

Information on the proposed TS changes is provided in Attachments A, B, and C.

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 proposed changes will not affect the health and safety of the public.

Sincerely,



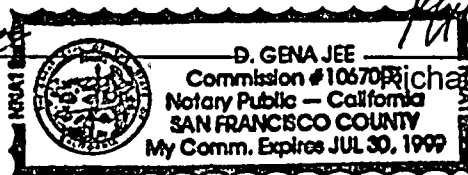
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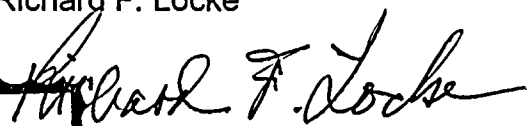
Subscribed and sworn to before me  
this 27th day of December 1995

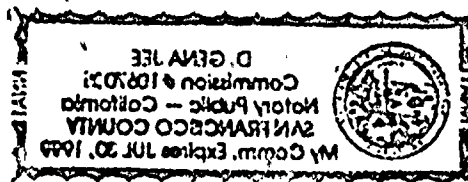
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**REVISION OF TECHNICAL SPECIFICATIONS 3/4.6.1.1, 3/4.6.1.2, 3/4.6.1.3, 3/4.6.1.6,  
3/4.6.3, and ADDITION OF 6.8.4 j.  
TO IMPLEMENT AN NRC-APPROVED REVISION TO 10 CFR 50, APPENDIX J**

**A. DESCRIPTION OF AMENDMENT REQUEST**

This License Amendment Request (LAR) would revise Technical Specifications (TS) 3/4.6.1.1, "Containment Integrity"; 3/4.6.1.2, "Containment Leakage"; 3/4.6.1.3, "Containment Air Locks"; 3/4.6.1.6, "Containment Structural Integrity"; 3/4.6.3, "Containment Isolation Valves"; their associated Bases; and adds Specification 6.8.4 j., "Containment Leakage Rate Testing Program," to implement the performance-based leakage rate testing program as permitted by 10 CFR 50, Appendix J, rather than paraphrasing the requirements of the regulation. These changes will support the implementation of the performance-based testing of Option B to Appendix J, for Type A, B, and C containment leakage rate testing and the appropriate rescheduling of testing. The table below describes the TS revision and the change numbers from the table are shown in the marked-up TS.

**Table of Technical Specification Revisions**

Change Number	Technical Specification	Description of Technical Specification Change
6.1-1	3.6.1.3 4.6.1.1 c, 4.6.1.2, & 4.6.1.3	Revised to delete test criteria and relocated to Containment Leakage Rate Testing Program. Retained air lock interlock testing of 4.6.1.3.
6.1-2	4.6.1.3	Deleted exemption to Appendix J that is no longer applicable.
6.1-3	3.6.1.2	Revised to delete containment tests at L <sub>1</sub> , which are no longer permitted by Option B. Deleted test criteria and relocated to the Containment Leakage Rate Testing Program. Revised ACTION to be consistent with standard TS.
6.1-4	4.6.1.6.1	Revised to delete inspection frequency specifics and reference the Containment Leakage Rate Testing Program.
6.3-1	4.6.3.4	Revised to delete the surveillance requirement and to reference the Containment Leakage Rate Testing Program.
6.0-1	6.8.4 j.	Added new TS on Containment Leakage Rate Testing Program to incorporate test criteria deleted from above TSs and note that program is based on 10 CFR 50, Appendix J, Option B.
B 6.1-1	B 3/4.6.1.2	Revised to delete reference to L <sub>1</sub> testing, which is no longer permitted by Option B.
B 6.1-2	B 3/4.6.1.2	Added reference to testing per Containment Leakage Rate Testing Program.
B 6.1-3	B 3/4.6.1.2	Deleted reference to exemption to Appendix J, Section III.D.1.(a)., which is no longer applicable with Option B.



Georgia Power Company for Vogtle Electric Generating Plant has submitted a request to partially implement Option B for Type B and C testing.

Changes to the TS and associated Bases are noted in the marked-up copies of the applicable TS pages provided in Attachment B. The proposed TS pages are provided in Attachment C.

#### B. JUSTIFICATION

The proposed changes to TS 3/4.6.1.1, 3/4.6.1.2, 3/4.6.1.3, 3/4.6.1.6, 3/4.6.3, and the addition of 6.8.4 j. would revise or support the revision of the TS to implement the performance-based leakage rate testing, versus paraphrasing Appendix J as is done in the present TS. There are no changes to the test type, test methodologies, or test acceptance criteria. Only the required frequency of tests would be affected. These changes are being submitted to allow PG&E to implement the approved revisions to 10 CFR 50, Appendix J, via the Containment Leakage Rate Testing Program.

Implementation of the Containment Leakage Rate Testing Program would allow the integrated leak rate test (ILRT) presently scheduled for the Unit 2 seventh refueling outage (2R7) to be evaluated for the extended surveillance interval, since the criteria established by Option B and the program requiring only one ILRT in 10 years are presently satisfied by ILRT results. Additionally, several local leak rate tests (LLRT), Type C tests, presently scheduled for 2R7 could likewise be postponed since they also meet the criteria for test frequency extension. Adoption of the performance-based leakage rate testing program will result in significant radiation exposure savings since unnecessary testing can be eliminated.

#### C. BACKGROUND

The purpose of Appendix J leak test requirements is stated in the introduction to 10 CFR 50, Appendix J, as quoted below:

*The purposes of the tests are to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases and (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of*



*the containment, and systems and components penetrating primary containment.*

License Amendments (LAs) 99 (Unit 1) and 98 (Unit 2), and an exemption from the 10 CFR 50, Appendix J, Section III.D.1.(a), were granted for Diablo Canyon Power Plant Units 1 and 2 on April 11, 1995. The LAs and exemption from 10 CFR 50, Appendix J, Section III.D.1.(a) deleted the  $40 \pm 10$  month TS test schedule requirement for the Type A test and removed the 10 CFR 50, Appendix J, requirement that the third Type A test for each 10-year period be conducted when the plant is shut down for the 10-year plant in-service inspection.

On September 26, 1995, following the approval of LA 99 and 98, a revision to 10 CFR 50, Appendix J, was issued by the Commission in the Federal Register, Vol. 60, No 186. The revision establishes Option B - Performance Based Requirements, for conducting ILRTs and LLRTs. The Commission also issued Regulatory Guide (RG) 1.163, dated September 1995, "Performance-Based Containment Leak-Test Program," that endorses, with exceptions, Nuclear Energy Institute (NEI) 94-01, Rev. 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J."

The NRC staff issued the revised 10 CFR 50, Appendix J, as part of the initiative to eliminate requirements that are marginal to safety. This effort is discussed in SECY-94-036, "Staff Plans for Revising 10 CFR 50, Appendix J, 'Containment Leakage Testing,' and for Handling Exemption Requests," dated February 17, 1994; and SECY-94-090, "Institutionalization of Continuing Program for Regulatory Improvement," dated March 31, 1994.

Appendix J, as revised to include Option B, establishes new performance-based requirements and criteria for periodic leakage-rate testing. With Option B the schedule requirements for Type A ILRTs and for Type B and C LLRTs will be based on results of past testing. NEI 94-01 was developed to implement the proposed Option B. The justification for extending test intervals for ILRTs and LLRTs is based on performance history and risk insights. RG 1.163, dated September 1995, that endorses NEI 94-01 with exceptions, provides specific guidance concerning criteria for and implementation of a performance-based leakage test program, including acceptable leakage-rate test methods, procedures, and analyses that may be used to implement the requirements and criteria of Option B. The Containment Leakage Rate Testing Program would



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implement the performance-based testing of Option B of 10 CFR 50, Appendix J, for Type A, B, and C testing following the guidelines of RG 1.163 dated September 1995.

#### D. SAFETY EVALUATION

As noted above, the Commission has reviewed and approved the regulation and the associated RG 1.163 dated September 1995. The Commission has determined that there are no safety consequences associated with the implementation of the 10 CFR 50, Appendix J, Option B testing program.

The proposed changes to TS 3/4.6.1.1, 3/4.6.1.2, 3/4.6.1.3, 3/4.6.1.6, 3/4.6.3, and the addition of 6.8.4 j. would reference the Containment Leakage Rate Testing Program, rather than paraphrasing Appendix J. PG&E will implement the performance-based Containment Leakage Rate Testing Program to be consistent with the guidance of RG 1.163, dated September 1995, to comply with the requirements of Appendix J. No new requirements would be added, and no existing requirements would be deleted, other than reduced pressure L<sub>t</sub> testing. Also, there are no changes to the test type or the test methodologies, only the test frequencies.

PG&E believes that the proposed TS change will not adversely affect the health and safety of the public because the proposed changes only implement an NRC approved regulation.

#### 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 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 changes to Technical Specification (TS) 3/4.6.1.1, 3/4.6.1.2, 3/4.6.1.3, 3/4.6.1.6, 3/4.6.3, and the addition of 6.8.4 j. to implement the performance-based Containment Leakage Rate Testing Program have no effect on plant operation. The proposed changes only provide mechanisms within the TS for implementing a performance-based methodology for determining the frequency of leak rate testing that has been approved by the Commission. The test type and test method used for testing would not be changed. The test acceptance criteria would not be changed, and containment leakage will continue to be maintained within the required limits.

Directly referencing the Containment Leakage Rate Testing Program for containment ILRT and LLRT requirements does not involve any modification to plant equipment or affect the operation or design basis of the containment. Leakage rate testing is not a precursor to or an initiating event for any accident.

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 only allow for the implementation of 10 CFR 50, Appendix J, Option B, testing frequencies and do not involve any modifications to any plant equipment or affect the operation or design basis of the containment. The proposed changes do not affect the response of the containment during a design basis accident.



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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 affect or change a Safety Limit or affect plant operations. The changes only implement the allowed 10 CFR 50, Appendix J, Option B testing frequencies that have been determined by the Commission not to involve a safety concern. The testing method, acceptance criteria, and basis for testing are not changed and still provide assurance that the containment will provide its intended function.

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 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 (1) a significant hazards consideration, (2) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) 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.

